

Rosefield Solar Farm

Applicant's Response to Deadline 5 Submissions

EN010158/APP/8.42
Revision 01
Deadline 6
August 2026
Rosefield Energyfarm Limited

APFP Regulation 5(2)(q)
Planning Act 2008
Infrastructure Planning
(Applications: Prescribed Forms
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Table of Contents

Table of Contents	1
1. Introduction	2
1.1. Purpose of the Report.....	2
1.2. Structure and Approach	3
2. Scope of this Report.....	4
2.1. Applicant's Position on Providing Responses	4
3. Applicant's Responses	9
Table 3.1: Applicants Responses to submissions made by Interested Parties at Deadline 5.....	9

1. Introduction

1.1. Purpose of the Report

- 1.1.1. This document provides, as appropriate, the Applicant's responses to the submissions received at Deadline 5 in respect of the Proposed Development.
- 1.1.2. This document does not look to replicate the positions previously iterated by the Applicant, and so the Applicant instead signposts towards the following documents, where relevant:
- **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]**
 - **Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082]**
 - **Position Paper on Ground Nesting Birds and Wintering Bird [EN010158/APP/8.36] [REP5-093]**
- 1.1.3. Where topics have previously been raised at Issue Specific Hearing 1 (held on 20-21 May 2026) and Issue Specific Hearing 2 (held on 22 May 2026), summaries of oral submissions and the Applicant's responses to the Action Points can be found in:
- **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [REP3-049];**
 - **Applicant's Response to Action Point 12 from ISH1 [EN010158/APP/8.31] [REP4-089];**
 - **Applicant's Response to Action Point 39 from ISH1 [EN010158/APP/8.27] [REP4-085];**
 - **Applicants Response to Action Point 45 from ISH1 [EN010158/APP/8.26] [REP4-084];**
 - **Applicant's Outstanding Responses to Actions from ISH1 and ISH2 [EN010158/APP/8.24] [REP4-083]; and**
 - **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 2 (ISH2) [EN010158/APP/8.17] [REP3-050].**
- 1.1.4. Where topics have been raised at Issue Specific Hearing 3 (held on 7-8 July 2026), summaries of oral submissions and the Applicant's responses to the Action Points can be found in:
- **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) [EN010158/APP/8.33] [REP5-090];**

- **Applicants Response to Action Point 18 from ISH3** [EN010158/APP/8.40] [\[REP5-097\]](#); and
- **Response to Action Point 22 and 23 from ISH3** [EN010158/APP/8.41] [\[REP5-098\]](#).

1.2. Structure and Approach

1.2.1. This document is structured as follows:

- **Section 2** reviews the submissions made by Interested Parties at Deadline 5 and confirms whether the Applicant is responding to the submissions, or otherwise, and the reason(s) why in either case; and
- **Section 3** provides the Applicant's responses, if applicable, to the submissions made by Interested Parties at Deadline 5.

1.2.2. For the benefit of the Examining Authority (ExA), the Applicant has sought to summarise passages from Deadline 5 submissions where only new matters have been raised by Interested Parties. This exercise has also sought to group submissions by topic and uses the ExA's **Rule 13 Letter** [\[PD-017\]](#) (dated 16 June 2026) as a general guide.

1.2.3. Where Interested Parties have reiterated previous comments, the Applicant defers to its previous responses contained within the documents referenced in **Section 1.1** of this document.

1.2.4. The Applicant has generally not summarised passages from Deadline 5 submissions where they are being progressed separately through Statements of Common Ground. Where this is the case, the Applicant refers the ExA to the relevant Statement of Common Ground in **Section 2** of this document.

2. Scope of this Report

2.1. Applicant's Position on Providing Responses

- 2.1.1. This Section expands on the structure of this document (as detailed in **Section 1.2**) by confirming whether or not this document provides a response to the submissions made by Interested Parties and, if not, the reason(s) why the Applicant is not responding.

Party and Examination Reference	Responded to in this Document?	Reason
Buckinghamshire Council [REP5-099]	No	The Applicant does not consider that this submission of the draft local plan for Buckinghamshire requires a response.
Buckinghamshire Council [REP5-101]	No	The Applicant wishes to note that points made within this submission are captured within the Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6] . As such, no further response to this submission is considered necessary.
Buckinghamshire Council [REP5-102]	No	The Applicant wishes to note that points made within this submission are captured within the Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6] . As such, no further response to this submission is considered necessary.
Buckinghamshire Council [REP5-100]	Yes	The Applicant wishes to respond to points made in this submission.
Buckinghamshire Council [REP5-103]	Yes	The Applicant wishes to respond to points made in post hearing comments.

Natural England [REP5-106]	No	The Applicant wishes to note that points made within this submission are captured within the Statement of Common Ground with Natural England [EN010158/APP/5.14.3] . As such, no further response to this submission is considered necessary.
Environment Agency [REP5-105]	No	The Applicant wishes to note that points made within this submission are captured within the Statement of Common Ground with the Environment Agency [EN010158/APP/5.15.6] . As such, no further response to this submission is considered necessary.
Claydons Solar Action Group (CSAG) [REP5-107]	Yes	The Applicant wishes to respond to points made in this submission.
CSAG [REP5-108]	Yes	The Applicant wishes to respond to points made in this submission.
CSAG [REP5-109]	Yes	The Applicant wishes to respond to points made in this submission.
CSAG [REP5-110]	No	The Applicant does not consider that there are any points made in this submission that need to be responded to.
East Claydon Parish Council [REP5-104]	Yes	The Applicant wishes to respond to points made in this submission.
Preston Farms Ltd and TCS Biosciences Ltd [REP5-111]	No	The Applicant has provided a standalone document, Applicant's Response to Preston Farms and TCS Biosciences Ltd's Deadline 5 Submission [EN010158/APP/8.43] which responds to the points made in this submission.
Jo and Nigel Davidson [REP5-125]	No	The Applicant notes this objection to the Proposed Development. The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Greg Smith MP [REP5-121]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Adrian Carne [REP5-112]	No	The Applicant notes this objection to the Proposed Development. The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.

Andrew Mark Taylor [REP5-113]	No	The Applicant notes this objection to the Proposed Development. The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Bridget Susan Lewis [REP5-114]	No	The Applicant notes this objection to the Proposed Development. The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Carol Gould [REP5-115]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Caroline Carne [REP5-116]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Caron Milner [REP5-117]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Daniel Clemens [REP5-118]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
David Tibbetts [REP5-119]	No	The Applicant notes this objection to the Proposed Development. The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Dr Christopher Jordan [REP5-120]	Yes	The Applicant wishes to respond to points made in this submission.
Heather Paul [REP5-122]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Heather Wright [REP5-123]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Jacqueline Campbell [REP5-124]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.

John Arthur Thorogood [REP5-126]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Julia Anne Taylor [REP5-127]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Keith Harold Wallace [REP5-128]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Mark Scholes [REP5-129]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Martin Paul [REP5-130]	No	The Applicant notes this objection to the Proposed Development. The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Miles Roberts [REP5-131]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Mrs Davina Thorogood [REP5-132]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Mrs Heather Trudie Collier [REP5-133]	No	The Applicant notes this objection to the Proposed Development. The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Nicola Jeanne Harrison [REP5-134]	No	The Applicant notes this objection to the Proposed Development. The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Peter Wright [REP5-135]	No	The Applicant notes this objection to the Proposed Development. The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.

Robet James Turner [REP5-136]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Sally Tyler [REP5-137]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Stephen John Slater [REP5-138]	No	The Applicant notes this objection to the Proposed Development. The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Stephen Lewis [REP5-139]	No	The Applicant notes this objection to the Proposed Development. The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Susan Cooper-Evans [REP5-140]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Thomas A Morrison [REP5-141]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Val Bond [REP5-142]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.

3. Applicant's Responses

Table 3.1: Applicants Responses to submissions made by Interested Parties at Deadline 5

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
Need, Site Selection and Alternatives			
3.1	Buckinghamshire Council [REP5-103], epage 6, Para. 18	Post hearing comment noting that Buckinghamshire Council's position is that a lack of overplanting changes the relationship to and need for the BESS (i.e. it is not needed to manage overgeneration as against the grid connection).	Section 7.9 of the Statement of Need [EN010158/APP/5.6] [APP-036] explains that BESS may be proposed as part of solar projects as a resource to hold energy generated by the solar farm during times of low demand and release it through the scheme's grid connection at times of high demand. This is consistent with the government's support for storage assets which can provide flexibility, <i>"meaning that less of the output of plant is wasted as it can either be stored or exported when there is excess production."</i> Further, storage assets <i>"can also supply electricity when domestic demand is higher than generation, supporting security of supply"</i> [NPS EN-1, paragraph 3.3.6]. BESS support both overplanted and non-overplanted schemes to deliver these benefits (because excess production on the electricity system is largely unrelated to whether an individual scheme is overplanted or not, but instead relates to the total national capacity of renewable generation assets connected to the grid and their level of generation at any particular point in time). Therefore the 'lack of overplanting' does not change the relationship to and need for the BESS at the Proposed Development because of the need to store generation at times of national excess production so that it is not wasted and can be exported when it is needed.
3.2	Buckinghamshire Council [REP5-100], epage 35, Ref. 3.3.3	Comment that Buckinghamshire Council acknowledges the engagement that has taken place with neighbouring infrastructure projects to date but that it remains unclear the extent of opportunities for co-location, shared infrastructure, rationalisation of land take, or other measures to minimise cumulative impacts.	The Applicant notes Buckinghamshire Council's comments. The Applicant has carried out engagement with neighbouring projects during the pre-application phase, continuing into the examination stage, and has set out below how opportunities to reduce cumulative effects, through coordinated design and an application of 'consolidation principles' have been explored as part of the Development Consent Order (DCO) Application: - Section 3.4 of the Interrelationships with other Nationally Significant Infrastructure Projects and Major Development Schemes [EN010158/APP/8.15.2] notes how, through discussion with Statera (the developer of the East Claydon BESS), the Applicant has designed the proposed AIL access track to broadly align with the proposed temporary construction access track for East Claydon BESS in order to potentially coordinate construction access across both projects. Therefore, and should both projects proceed to the implementation/delivery stage, both parties have agreed to ongoing cooperation and coordination to further discuss the potential opportunity for shared use of the access track to avoid the need for multiple tracks to be constructed. Notwithstanding, the coordination of this construction access is a

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			potential opportunity for interface for collaboration and is not relied upon as a form of mitigation to the Proposed Development; - Section 3.9 of the Design Approach Document [EN010158/APP/5.8.3] [CR1-014] outlines how key issues relating to HS2 have influenced the design of the Proposed Development. This includes consideration of interaction with works areas and the diverted PRoW, connectivity with new routes created as a result of HS2 and the location of mitigation planting; and - The Design Approach Document [EN010158/APP/5.8.3] [CR1-014] explains how Field E23 was removed as a potential siting zone for the Rosefield Substation and how six additional fields were included to facilitate the Grid Connection Cable Corridor to the new National Grid East Claydon Substation. These design amendments sought to manage the technical interfaces between the projects. Otherwise, and as stated previously by the Applicant, each project ultimately has its own bespoke requirements and timelines for construction meaning that full consolidation of infrastructure is not feasible. Infrastructure projects are developed on a strong basis that there is a need for them. The Applicant recognises the importance of collaborating across projects but would suggest that such collaboration is unlikely to reduce their scale, due to their need, and that such reliance on co-location and/or shared infrastructure etc. can result in overdependencies meaning that a project's deliverability hinges on all those it relies on being consented and delivered on the same timeframes, which is both unlikely and highly jeopardising to the successful delivery of necessary infrastructure.
3.3	CSAG [REP5-107] , epages 1 - 5	Paper setting out that the party does not consider that the Applicant has shown whether the numbers of waders which use the site and are at risk of being displaced by the Proposed Development are significant in a County (Buckinghamshire) sense. Query on whether the Applicant has contacted the Bucks Bird Club for their opinion on county wintering populations. Further comment that the Applicant's assessment on impacts to Golden Plover and lapwing has been aggregate, which results in negative impacts on county important wintering bird receptors being masked or lost.	The Applicant has submitted Position Paper on Ground Nesting Birds and Wintering Bird [EN010158/APP/8.36] [REP5-093] at Deadline 5 that outlines that there are numerous locations within the county that support significant numbers of wintering lapwing and golden plover. Therefore, even in the unlikely event that wintering lapwing and golden plover were to be displaced in their entirety as a result of the Proposed Development, this would not result in a significant effect as has been reported within Environmental Statement (ES) Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.7]. The Applicant has been fully transparent with regards the numbers of wintering lapwing and golden plover recorded, and as outlined above considering them separately as individual receptors as opposed to aggregate wintering birds would not alter the assessment carried or change the conclusions reached within the within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.7]. Notwithstanding this, proportionate mitigation is proposed to address these potential impacts as outlined within the Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6.7]. The Applicant has not contacted Bucks Bird Club directly but, as outlined within the Position Paper on Ground Nesting Birds and Wintering Bird

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			[EN010158/APP/8.36] [REP5-093], reports published by Bucks Bird Club have been used to inform the assessment presented within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.7].
3.4	CSAG [REP5-109] , epages 149 and 150, Response to Q2.5.4	Comment that the removal of panels from the proposed B Fields is welcomed but do not obviate the scope for significant impacts on important foraging resources. Further comment that the party is concerned that Natural England has taken a non-precautionary approach which leaves the potential for significant impacts on Bechstein's bats and potentially other bat species.	The Applicant welcomes CSAG's acknowledgement that the removal of Solar PV modules from the B Fields is positive. Following extensive engagement with the Applicant, Natural England confirmed in its Deadline 5 submission [REP5-106] that the Proposed Development as amended should resolve its outstanding concern regarding potential effects on Bechstein's bats arising from the loss of foraging habitat. This conclusion reflects the revised package of measures, including the achievement of no net loss of grazed habitat within 1.5km of Shrubs Wood and the wider mitigation secured across the Order Limits. The Applicant therefore considers that the revised proposals would not result in a significant adverse effect on the Bechstein's bat population.
3.5	CSAG [REP5-109] , epages 154 and 155, Response to Q2.5.7	Comments that no distinction is made between grassland and 'grazed grassland'.	The Outline LEMP [EN010158/APP/7.6.7] The areas that are grassland are clearly stated, and a commitment to grazing (except where circumstances outside of the Applicant's control are in force) has been made in the Outline LEMP [EN010158/APP/7.6.7].
3.6	CSAG [REP5-109] , epages 159 and 160, Response to Q2.5.8	Comment that the Applicant's approach to potentially significant effects to Bechstein's bats do not engage with the relevant paragraphs of NPS EN-1. Further comment that the Applicant's definition of 'harm' is not policy compliant and that the removal of solar infrastructure from Fields B6, B8 and part of B7 may have lessened the likelihood of such 'significant harm' but has not eliminated it.	The Applicant wholly disagrees with CSAG's assertion that the Applicant is 'inviting the ExA to adopt an illogical, irresponsible and non-policy compliant definition of significant harm'. The Applicant points to its response to Q2.5.9 in Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082] which applies a logical and reasoned position on the Proposed Development's compliance with the relevant planning policy. This explains why a <i>potentially</i> significant effect does not equate to 'significant harm'. The Proposed Development's mitigation is designed to: • maintain the Bechstein's bat range/distribution by avoiding woodlands and hedgerows; and • maintain the Bechstein's bat population by providing additional grassland of better quality than is currently the case, all within the Bechstein's bat current home range (and better distributed across the whole landscape). These elements together support the maintenance of the conservation status of Bechstein's bat in the longer term. In the unlikely event that there is a short-term adjustment to the population during construction and planting establishment, this could similarly not equate to significant harm. The Applicant would further note that such an impact on Bechstein's bats has not been discernible as a result of the much larger HS2 construction operations adjacent.

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
3.7	CSAG [REP5-109] , epages 165 and 166, Response to Q2.5.11	Comments that the Applicant has had an incremental 'backing away' of a solid commitment to grazing since submission and that the Applicant's position on grazing and its importance to mitigation and compensation of impacts is now somewhat ambiguous.	The Applicant refutes this allegation. The Applicant has already on numerous occasions confirmed the intention to manage grassland through grazing should the Proposed Development receive consent as outlined within the Outline LEMP [EN010158/APP/7.6.7], and this position has been maintained throughout the Examination process. At the time of submission of the DCO Application, the Outline LEMP [EN010158/APP/7.6] stated at 3.2.37: "<i>Management of grassland within the Order Limits will be undertaken by a combination of sheep (under panels) and cattle grazing (areas with no panels). If grazing for any reason is not possible then a late summer cutting regime will be implemented. See section 5.2 for further details.</i>" That statement is unchanged in the latest iteration of the Outline LEMP [EN010158/APP/7.6.7]. Further, in paragraph 5.2.3 of the Outline LEMP [EN010158/APP/7.6.7], the original statement that "<i>Opportunities for grazing will be considered where practicable and is viable</i>" has been replaced with (emphasis added): "<i>The Applicant intends to secure grazing as the preferred grassland management method. An alternative option of mechanical mowing and collection would be used in the unlikely event that grazing is not possible due to factors outside of the Applicant's control at any point in time or location(s), such as disease outbreak which limits livestock grazing or in the highly unlikely event that the Applicant cannot procure flock(s) of sheep or herd(s) of cattle.</i>" The Applicant therefore considers that there has only been a strengthening of its intention to secure grazing at the Proposed Development.
3.8	CSAG [REP5-109] , epage 170, Response to Q2.5.13	Comment that there is a qualitative difference between grassland managed by grazing and grassland managed by mowing when considering 'net gain' in a grassland area.	The Applicant has indicated that grassland management would be undertaken through low-intensity grazing (and, if not, then management through an appropriate mowing and collection regime) to ensure the correct balance is achieved to deliver floristic diversity and invertebrate biomass. It should be noted that increasing botanical diversity and hence invertebrate diversity is not reliant on grazing and therefore the overarching objective (of increasing invertebrate diversity) can still be delivered even if grazing is not possible, as has previously been stated in Applicant's Response to Deadline 3 Submissions [EN010158/APP/8.22] [REP4-081] ref.3.3.15. However, within the B Fields where solar PV modules have been removed, grazing within these fields would potentially be of higher intensity if required, and as a result within the BNG assessment that was submitted at Deadline 5 (see ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.5] and ES Volume 4, Appendix 7.17 BNG Assessment Statutory Metric (EXCEL) [EN010158/APP/6.4.5]) these fields have been assumed in the post development scenario to be modified grassland in poor condition to enable unrestrictive grazing to occur if required, therefore not overestimating the net gain value that these fields would deliver. The final grazing regime including stocking densities and timings would be provided in the detailed Landscape and Ecological Management Plan in consultation with relevant stakeholders.

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
3.9	CSAG [REP5-109] , epage 175, Response to Q2.5.15	Comment that the party considers that the Applicant's removal of Fields B6, B8 and part of B7 from solar development is evidence that the Applicant did not follow the mitigation hierarchy.	The Applicant does not agree with CSAG's view that the removal of Solar PV modules from Fields B6, B8 and part of B7 demonstrates that the mitigation hierarchy has not been adhered to. The Applicant has demonstrated clearly how the mitigation hierarchy has been adhered to in relation to the Proposed Development within Table 7.6 in ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.7]. In applying CSAG's interpretation, this would mean to suggest that the application of the mitigation hierarchy to a project is static and that any removal of infrastructure or modification of infrastructure layout during examination would, or could, infer a misapplication of the mitigation hierarchy. In the Applicant's case, the removal of Solar PV modules from Fields B6, B8 and part of B7 reflects a compromise between the Applicant and Natural England following regular and detailed discussion between September 2023 and the present, as reflected in Statement of Common Ground with Natural England [EN010158/APP/5.14.3]. In relation to the assessment of impacts and the methodology used to determine these, the Applicant has amply responded to the use of the term 'potentially significant' and what this means in terms of potential residual effects and relevant energy policies; please see the response to 3.7 above. Natural England have similarly noted that <i>'This issue has also been discussed at various points in the response document which relate to the relevance of specific paragraphs of the Energy National Policy Statement. Now that we expect there will be no net loss of foraging resource to Bechstein's bat we consider this a moot point.'</i>
BESS			
3.10	CSAG [REP5-109] , epages 19 to 21, Response to Q2.4.1	Comment that the party does not consider that the explanation of the BESS being associated development accords with guidance on associated development under the PA 2008. Further question from the party as to how the BESS would be subordinate to the principal development, noting that the BESS would have greater capacity than the solar element of the scheme.	Appendix 1 of the Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087] sets out the Applicant's position on the relevant tests for associated development set out in the <i>Guidance on associated development applications for major infrastructure projects</i>. This appendix addresses the key considerations to determine whether infrastructure is associated development, including the direct relationship between the elements of the scheme, subordinacy, proportionality in scale and whether the sole purpose of the associated development is additional revenue. It directly explains how the BESS component of the Proposed Development meets each of the four relevant tests. Relevantly, this appendix explains how, in accordance with the guidance, the proposed BESS is subordinate to, and supports, the operation of the principal development (being the solar array). It also clearly sets out why the BESS is not solely included to provide additional revenue to cross-subsidise the cost of the principal development – namely because no cross-subsidisation is necessary for the solar array. The Applicant notes that the guidance does not require, as this representation appears to interpret, that the Applicant must demonstrate that the support provided

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			by the associated development (i.e. the BESS) cannot be provided by any other means or infrastructure. Section 7.9 of the Statement of Need [EN010158/APP/5.6] [APP-036] provides further evidence on the support provided by a co-located BESS to a principal solar development. The representation states that “<i>The BESS would have greater capacity than the solar element of the scheme in terms of GWh</i>”. The Applicant does not follow this reasoning because the capacity of the solar element of the Proposed Development is not and cannot be measured on a GWh scale. Paragraph 6.11.52 and following of the Statement of Need [EN010158/APP/5.6] [APP-036] provides further technical information on the important difference between energy capacity (measured in MWh) and power capacity (MW). Figure 19 to Figure 22 and associated commentary of the Statement of Need provide examples of how the BESS would support the operation of the principal development, including storing energy generated by the solar array and exporting it later in the day when demand is higher.
3.11	CSAG [REP5-109], epage 142, Paras 4.11 and 4.12	Comments noting concern over ‘informal’ method used in the Glint and Glare Assessment. Further comment that the LVIA should consider the effects of glint and glare in particular locations / for specific landscape and visual receptors as they consider that it is likely to adversely affect people’s experiences of being in or travelling through the landscape.	As set out in ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4.2] [REP5-045], in the absence of a published official methodology for Glint and Glare assessment, the analysis is based on industry’s best practice and guidance: “Solar Photovoltaic Glint and Glare Guidance” (Fourth Edition, September 2022). The vast majority of Glint and Glare assessments in UK (if not all) refer to this formal guidance, and the Applicant rejects the assertion that its method is “informal”. The conclusions of the analysis are also based on this piece of guidance. Adverse glint and glare effects on people’s experience are not unexpected where solar reflections are visible. However, the analysis demonstrates that these effects will be negligible or minimal, and they will not significantly increase the risk of an accident or alter the enjoyment of the landscape. The analysis is limited to receptors where significant impacts are considered possible. Further commentary is, therefore, not included in the LVIA as glint and glare effects are judged to be no more than low for people in the study area and any such effects would not change the assessment of effects already described within the LVIA.
3.12	Buckinghamshire Council [REP5-100], epage 56, Ref. 3.4.40	Comment noting that the Applicant has added more contributory elements of setting to the assessment however they have not identified any additional of altered impacts/change or effects. The Council consider that the changes to the baseline would have led to at least some changes to the impact assessment.	The Applicant disagrees. In some cases, whilst the Applicant acknowledges the contribution that these elements make to significance, this contribution is not diminished by the Proposed Development and therefore no additional harm or increase in impact magnitude is recognised. In others, whilst the contribution of the element of setting to significance would be reduced the Applicant considers that the overall harm to significance would not result in an increase in the magnitude of impact for the reasons set out within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4] [REP5-059]. For example, Botolph House Grade II* Listed Building – the Applicant acknowledges that historically views of and from the house to the east were part of the design intent and therefore contribute to significance,

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			however this element of setting is less apparent in long range views due to the later planting; the contribution of this element of setting to the significance of Botolph House will therefore be minimally affected by the presence of the Proposed Development as detailed within Section 2.3 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4] [REP5-059] . For Blackmoorhill Farmhouse, whilst the Applicant acknowledges the contribution that the use of dressed stone makes to understanding the building's historic connection with Claydon House, there would be no loss of this historic fabric, the physical relationship with Claydon House would be unaltered and the association would remain legible, the Applicant therefore considers that the harm to significance would be negligible for the reasons set out within Section 2.13 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4] [REP5-059] .
3.13	CSAG [REP5-109] , epage 21, Response to Q2.12.2	Comment querying the significant (major/moderate) adverse visual effect assigned to Bernwood Farm, and how this aligns with the conclusion that the impact on cultural heritage of Bernwood Farm would be moderate and that the effect would be slight and not significant.	The assessment of impacts on residential amenity follows a different methodology to that used for cultural heritage assessment. Although the locations are the same the receptors are not. For RVAA the receptor is the resident, and these receptors are given high importance in the EIA. In cultural heritage assessment the receptor is the building itself and the heritage interests that it holds. The importance of Bernwood House as a cultural heritage receptor is agreed with Buckinghamshire Council as low, this agreement is set out within the Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6] . The difference in assigned importance between the residents as receptors in the RVAA and the building as receptor in the cultural heritage assessment (ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4] [REP5-059]) results in a different level of effect.
3.14	Dr Christopher Jordan [REP5-120] , epage 1, Ref. 1	Comment requesting that the Applicant provide the results from a National Grid trial trenching investigation in Fields SA51-59 and E20-22, in order to gain a more complete picture of the archaeological situation and the potential results.	The Applicant is unable to provide a report produced by a third party that has not been made available to the Applicant and is not yet in the public domain. The information within the report on National Grid's trial trenching will be considered when preparing Written Schemes of Investigation for post-consent evaluation (should it be available at that time) or during reporting on the results of post-consent evaluation or other stages of archaeological work at the appropriate time. This approach is detailed in the Draft Archaeological Management Strategy [EN010158/APP/7.10.2] [REP1-094] which has been agreed with Buckinghamshire Council. The potential for archaeological remains to be present within the area of the proposed National Grid East Claydon Substation is addressed within the Applicant's assessment within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.4] [REP5-028] under the assessment of Physical impacts to currently unknown archaeological remains, and within ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.4] [REP5-038] under the section on inter-project effects from the proposed National Grid East Claydon Substation. The assessments within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.4] [REP5-028] and ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.4] [REP5-038] are based on

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			reasonable worst case assumptions (that any currently unknown archaeological remains could be of up to very high importance and that archaeological remains of high or very high importance would be subject to mitigation measures to avoid impacts, whilst archaeological remains of lesser importance would be subject to mitigation measures to be agreed with Buckinghamshire Council's Archaeological Advisor, thereby avoiding any significant effects either from Rosefield Solar Farm or in combination with the Proposed National Grid East Claydon Substation). As such the Applicant considers that no further information is required at this time to inform the decision.
3.15	Dr Christopher Jordan [REP5-120] , epages 1 and 2, Ref. 2	Comment that the Applicant should have also included the Grade II listed White House and its associated listed wall in their cultural heritage assessment, alongside the Grade II* listed St Mary's Church.	The list of assets to be included within the assessment was agreed with Buckinghamshire Council, this is detailed within the Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6]. The Claydons Solar Action Group also agree with the list of assets likely to be impacted (which excludes White House) as detailed in Statement of Common Ground with Claydons Solar Action Group [EN010158/APP/5.23.4]. White House (NHLE 1212147) is a 16th to 17th century house in roughcast render over a probable timber frame (some of which is exposed on the left side). It is L-shaped in plan, oriented with its long axis approximately east-west and the projecting bay at the west end on the south side. The building derives significance (and its principal reason for listing at Grade II) from the architectural and historic interest inherent in this fabric as an example of rural vernacular building. The house is situated on the north side of Church Way and is best appreciated from this location, where the separately listed boundary wall extends to the east. The house forms (with associated outbuildings) the last property on this side of the road. It is not however prominent in views of East Claydon from the east due to the topography and the presence of significant mature vegetation within its garden. Satellite imagery shows that this large garden to the north and east of the house has a semi-formal form. This contributes to the significance of the house as a historically higher status building within the village despite its vernacular construction. The Proposed Development would be screened from view from the house itself due to the existing vegetation. It may be visible from Church Way particularly when east of the house when approaching the edge of the plateau on which East Claydon sits. This change to the wider setting of White House is considered to result in a negligible degree of harm to the significance of the house and as such no significant effect is predicted.
Landscape and Visual			
3.16	CSAG [REP5-109] , epage 145, paras 5.3 to 5.10	Comments that the LVIA has underestimated levels of landscape sensitivity and therefore levels of adverse effects.	The Applicant disagrees that levels of landscape sensitivity have been underestimated and maintains that a detailed review of sensitivity, informed by susceptibility and value tables, is provided for each relevant landscape character area as set out in ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112] . This study follows the principles set out

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			in the Guidelines for Landscape and Visual Impact Assessment, Third Edition, and the Technical Guidance Note 02-21 - Assessing Landscape Value Outside National Designations, both published by the Landscape Institute. The Applicant therefore maintains that levels of sensitivity have been accurately and consistently judged and can be confidently taken forward to form part of the overall assessment of effects. The assessment of sensitivity is specific to the type of development and its location relative to the landscape character area being assessed. A judgement of Low sensitivity has been made where a landscape has been assessed of community value and either low or medium/low susceptibility, with the latter judgement based on the limited and indirect perception of the Proposed Development from within the landscape; it is acknowledged that LCA 5.6 contains one small, enclosed field of Solar PV modules, located adjacent to the existing National Grid East Claydon Substation, but effects are otherwise indirect. The description of Low sensitivity is, therefore, not an assertion that these are 'despoiled landscapes', but that these particular landscapes have a good ability to accommodate the Proposed Development without undue changes to their baseline condition or character.
3.17	CSAG [REP5-108] , epages 1 to 4	Submission providing evidence on impacts of noise and vibration from other solar sits on PRow as per Action Point 43 from ISH3. This submission includes a comment received via the UK Solar Alliance setting out someone's experience of the construction of a solar development near their house, links to recordings that are not available to listen to and conclusions based on those recordings which set out that considerable noise is expected and that impacts on users of the PRow would be unavoidable and would negatively impact the enjoyment of users. Further comment that the Applicant is proposing piling up to 12 hours per day for a period of weeks.	The Applicant has not been able to access the recordings that were provided, and therefore cannot provide comment. Notwithstanding this, the recordings have been taken from unrelated schemes and therefore direct comparisons may not be applicable. The construction induced noise levels experienced by users of a public right of way (PRow) as a result of the solar PV module piling works would be dictated by the separation distance between the works and the footpath. It could be expected that users of PRow within or adjacent to the Order Limits would be subject to construction noise levels which exceed the typical pre-construction ambient noise levels. However, the solar PV module piling activities affecting an individual route would be localised, and the transitory nature of PRow users would mean that they are not exposed to construction noise for an extended period. There are not expected to be any risks of hearing damage or other noise-related adverse health effects for users of the PRow network resulting from the piling works. Whilst it is acknowledged that the piling works would be a prolonged programme activity, it is important to note that this will be across the Order Limits, and not fixed in a given location. As a result, the effect on an individual receptor would be short term, owing to the movement of the piling rigs within the Site. This would include PRow users, as the piling works would not be taking place adjacent to the footpath for extended periods of time. Regarding the hours of operation for the piling works, Section 2.5 of the Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2.7] provides the following commitment:

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			<i>“Between 07:00 - 08:00 and 18:00 - 19:00 Monday to Friday and 07:00 – 08:00 on Saturdays, noisier activities (such as piling) would be restricted depending on the construction activity proposed to take place and its proximity to sensitive receptors.”</i>
		Traffic	
3.18	Dr Christopher Jordan [REP5-120] , epage 2, Ref. 4	Comment questioning whether the Applicant undertook counts of non-motorised road users as part of its transport assessment.	Traffic surveys were discussed with Buckinghamshire Council and the scope, location, duration and types were all agreed. Pedestrian counts on public roads were not recorded, however the impacts on these users have been, as noted in the assessments provided in ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]. Mitigation measures for non-motorised users are detailed in section 4.11 and Chapter 6 of ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4.3] and Outline Rights of Way and Access Strategy [EN010158/APP/7.8.5] [CR1-026]. NPS EN-1, Paragraph 5.14.6 notes that consultation should be undertaken with National Highways and the relevant highway authority for NSIP applications. That consultation has happened and Transport and Access matters have been agreed with Buckinghamshire Council as relevant highway authority. No concerns relating to non-motorised users of the network have been raised by the local planning authority.
		Soil	
3.19	Buckinghamshire Council [REP5-100] , epages 11 and 12, Ref. 3.1.15	Comment requesting a breakdown of ALC grades and land use for all areas of the Proposed Development.	Table 12.4 in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.5] presents a breakdown of the land take of key infrastructure components by ALC Grade. Table 12.4 does not therefore cover the entire area of the Order Limits (675.05ha) as it only includes key infrastructure components, and a short explanation of this has been added underneath Table 12.4 at Deadline 5. All parts that are not key infrastructure as shown in Table 12.4 are either ecological mitigation areas or cable access areas. The Works Plans [EN010158/APP/2.3.7] present a detailed breakdown of the layout and land use of all areas within the Order Limits. Additionally, ES Volume 3, Figure 12.1: Agricultural Land Classification [EN010158/APP/6.3.2] [AS-022] provides a visual breakdown of the ALC grading of the surveyed area within the Order Limits. Land use is also discussed separately in the Food Security Explanatory Note [EN010158/APP/8.35] [REP5-092].
3.20	Buckinghamshire Council [REP5-100] , epage 28, Ref 3.2.5	Comment noting a disconnect between the total areas of the Proposed Development shown in Table 12.3 of the revised ES, as compared to Table 12.4, of ES Volume 2, Chapter 12: Soil.	Table 12.3 in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.5] presents the areas of each ALC Grade within the Order Limits. Table 12.4 presents how much land of each ALC Grade the key infrastructure components take and does not therefore cover the entire area of the Order Limits (675.05ha). A short explanation of this has been added underneath Table 12.4 at Deadline 5. The remaining areas that

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			are not planned to host key infrastructure are either ecological mitigation areas or cable access areas. The Works Plans [EN010158/APP/2.3.7] present a detailed breakdown of the layout and land use of all areas within the Order Limits.
3.21	Buckinghamshire Council [REP5-100], epage 28, Ref. 3.2.6 and epages 51 and 52, Ref. 3.3.41	Comment that the party considers that the assessment is contradictory between Grade 2 land compared to Grades 3a and 3b land and the Applicant confuses their assessment of soil structure with ALC.	The justification of the magnitude of impact on ALC Grade 2 land as negligible instead of minor is based on land take area. As the 2022 IMEA guidance 'A New Perspective on Land and Soil in Environment Impact Assessment' does not specify hectareage limits for each magnitude of impact classification for temporary loss of soil features, the Applicant has applied professional judgement to interpretation of the table. If, as the guidance states, permanent, irreversible loss of up to 5ha can be classed as a minor magnitude of impact, then it is not considered appropriate that a temporary loss of 3.01ha should be similarly classed as minor. The temporary loss of 3.01ha of ALC Grade 2 land has therefore been classed as a negligible magnitude of impact. The difference in area between Grade 2 land (3.01ha) and Grades 3a and 3b land (7.19ha and 637.38ha respectively) is the reason that Grade 3a and 3b land has been assessed as a minor magnitude of impact. The Applicant therefore does not consider that the assessment between Grades 2, 3a and 3b land is contradictory. 'Table 3: Guidance on Identifying Magnitude of Impact on Soil Resource and Soil Function' in the 2022 IMEA guidance 'A New Perspective on Land and Soil in Environment Impact Assessment' classifies the magnitude of impacts on soil resources and soil function by assigning a grading corresponding to a description of impacts which restrict proposed land use. A negligible magnitude of impact on soil resource and function is defined as "<i>No discernible loss or reduction or improvement of soil functions or soil volumes that restrict current or proposed land use</i>". This has been used to inform the decision to classify magnitude of impact on Grade 2 land, alongside the aforementioned small size of the Grade 2 land area. The Applicant has not, therefore, confused the assessment of soil structure with ALC, but rather considers soil function and volume in determining magnitude of impact in line with the guidance.
3.22	CSAG [REP5-109], epage 142, Para 4.8	Comment that the response is not clear about whether topsoil would be stripped. If that is needed, the party notes that it has implications for transport, site layout, restoration etc	Topsoil would not be stripped for the creation of grassland. Any soil stripping and storage that occurs on other areas within the Proposed Development will be carried out in line with procedures detailed in the Outline Soil Management Plan (Outline SMP) [EN010158/APP/7.7.4] [REP5-077], in line with the Ministry of Agriculture, Fisheries and Food (2000) 'Good Practice Guide for Handling Soils Sheets' and Institute of Quarrying (2021) 'Good Practice Guide for Handling Soils in Mineral Workings'. Section 3.7.5 in the Outline SMP [EN010158/APP/7.7.4] [REP5-077] details the management of soil bunds stored for the long term which ensures that soils remain healthy and capable of reinstatement and reuse.

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
3.23	Buckinghamshire Council [REP5-103] , epage 13, Para. 48	Comment noting that the draft Regulation 19 Local Plan includes the proposed Quainton-Wing Hills Area of Attractive Landscape designation which, while attracting limited weight at this stage, reflects Buckinghamshire Council's emerging position on the landscape's value, sensitivity and need for protection.	The Applicant acknowledges that the draft Regulation 19 Local Plan was recently published, with its consultation period having opened on 23 July 2026. The Applicant also recognises the comments made by Buckinghamshire Council with regard for the inclusion of the proposed Quainton-Wing Hills Area of Attractive Landscape (AAL) designation. ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.5] recognises the Quainton-Wing Hills AAL to be a medium sensitivity receptor which is supported by Section 3.2 of ES Volume 4, Appendix 10.2: Rosefield Extracts from Published LCA [EN010158/APP/6.4] [APP-111].
3.24	Buckinghamshire Council [REP5-103] , epages 18 and 19, Para. 75	Comment noting that, while Buckinghamshire Council recognises concerns regarding the specialist expertise required to discharge the biosecurity requirement, it considers that discussions with the Applicant should focus on ensuring the appropriate expertise is secured rather than transferring responsibility to the Secretary of State. Comment noting that the Council maintains its position as the preferred discharging authority.	The Applicant submits that the Secretary of State is the most appropriate body to act as the discharging authority for Requirement 20 (biosecurity management plan) in the Draft DCO [EN010158/APP/3.1.9] because of the complexity and importance of biosecurity matters relevant to that Requirement and the national / public health focus of the Preston Farms Limited / TCS Biosciences Limited (PFL/TCS) operations that the Requirement is designed to protect. Requirement 20 states that, to discharge this Requirement, the undertaker must prepare a detailed biosecurity management plan (substantially in accordance with the Outline Biosecurity Management Plan (Outline BMP) [EN010158/APP/8.39] [REP5-096]) and submit it to the Secretary of State for consideration and approval. The Outline BMP [EN010158/APP/8.39] [REP5-096] secures the essential biosecurity outcomes, minimum controls and governance arrangements for the Proposed Development and includes measures aiming to reduce the risk of pathogens, contaminants or potentially harmful material being transferred between the Proposed Development and PFL/TCS operations. The Outline BMP [EN010158/APP/8.39] [REP5-096] also seeks to maintain a clear physical and operational separation between the works and activities forming part of the Proposed Development and PFL/TCS operations and provides for various other considerations such as the coordination of access and construction activities, monitoring and auditing, compliance documentation, communication between relevant parties, and the provision of independent veterinary advice. These issues are complex and require the discharging authority to have relevant expertise or timely and efficient access to relevant expertise. Buckinghamshire Council acknowledged at Issue Specific Hearing 3 that it did not have that anyone on staff with the appropriate expertise to deal with biosecurity issues (see paragraph 72 of Buckinghamshire Council's ISH3 Post Hearing Note [REP5-103]). The Secretary of State and the Department of Energy and Net Zero are well-versed in acting as the discharging authority for complex issues including, for example, DCO Requirements relating to aviation and wake effects (relating to commercial loss / energy production) (see Requirements 36 (primary surveillance radar mitigation) and 37 (instrument flight procedures) in The Rampion 2 Offshore Wind Farm Order

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			2025¹, Requirement 29 (Claxby radar mitigation) in The Hornsea Four Offshore Wind Farm Order 2023² and Requirement 37 (wake effects plan) in The Dogger Bank South East and West Offshore Wind Farms Order 2026³). The Secretary of State also has more convenient access to the relevant expertise of other governmental departments (such as the Department of Health and Social Care or the Home Office) that it can seek and consider when discharging this Requirement. Further, the Applicant notes that the PFS/TCL operations are related to the supply of products to the National Health Service (NHS) / public health system – this national, public link supports the Applicant's position that the Secretary of State, as a national, public body, is the most appropriate discharging authority for Requirement 20. Finally, the Applicant understands that the PFS/TCL operations are conducted pursuant to a licence issued by the Home Office which contains biosecurity conditions that would be relevant to the consideration of a detailed biosecurity management plan prepared under Requirement 20. As noted above, the Secretary of State would have a greater capacity to seek the Home Office's input in respect of the interplay between the detailed biosecurity management plan and these conditions and the overall process for consultation would likely be more streamlined between government departments than between differing levels of government.
3.25	CSAG [REP5-109], epage 144, Paras. 4.31 to 4.35	Comments refuting the Applicant's use of deer-proof fencing as part of its site security measures, stating that this type of fencing is robust enough to keep sheep in which not robust enough to prevent / deter solar crime. Further comment that, if deer proof fencing is replaced by other security fencing, this would increase levels of adverse landscape and visual effects.	Fencing would enclose the Solar PV modules located within Work No. 1. Deer-proof fencing is typically used to secure Solar PV modules, and is considered sufficiently robust for these purposes, hence its proposed use in the case of the Proposed Development. The fields containing the Solar PV modules and supporting infrastructure would likely be fenced using 'deer-proof fencing' which is formed of wooden and/or metal posts and wire mesh, up to 2.5m in height (AGL). Pole-mounted internal-facing closed circuit television (CCTV) systems would be installed at a height up to 5m to provide increased security and deterrent for thieves. Access gates would be metal and be of a similar height to the perimeter fencing. The final design of the fencing used to enclose the Solar PV modules would be made in agreement with Buckinghamshire Council.
3.26	East Claydon Parish Council [REP5-104], Page 1	Comments noting an objection to the proposed working hours during construction works, setting out concerns with regards to impacts of	Construction phase control mechanisms include normal hours of working and traffic management. These measures are set out in the Outline CEMP [EN010158/APP/7.2.7] and the Outline Construction Traffic Management Plan [EN010158/APP/7.5.5] [REP5-073] . Both of these documents have been informed

¹ The Rampion 2 Offshore Wind Farm Order 2025 [Available at: [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010117-002453-Development Consent Order as Made by the Secretary of State.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010117-002453-Development%20Consent%20Order%20as%20Made%20by%20the%20Secretary%20of%20State.pdf); Accessed on: 5 August 2026].

² The Hornsea Four Offshore Wind Farm Order 2023 [Available at: <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010098-002330-DCO%20Hornsea%204%20OWF%20signed.pdf>; Accessed on: 5 August 2026].

³ The Dogger Bank South East and West Offshore Wind Farms Order 2026 [Available at: <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010125-002639-2%20Development%20Consent%20Order%20DBS%20signed%20redacted.pdf>; Accessed on: 7 August 2026].

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
		noise, traffic movements, lighting, air quality and associated emissions.	by the Environmental Impact Assessment (EIA) and will guide the construction process, through environmental controls, to promote construction practices and avoid adverse or nuisance-causing impacts during the construction phase. Core working hours are 07:00 to 19:00 Monday to Friday, and 07:00 to 12:00 on Saturday. Between 07:00 to 08:00 and 18:00 to 19:00 Monday to Friday and 07:00 to 08:00 on Saturdays, noisier activities would be restricted depending on the construction activity proposed to take place and its proximity to sensitive receptors. This aligns with the Buckinghamshire Council guidelines for construction sites and British Standard 5228:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites'. The reference to the hours 06:00 to 20:00 apply to the travel time for employees to and from Site either side of the core working hours (Outline CEMP [EN010158/APP/7.2.7]). Security lighting through the night will be passive infrared systems (not visible spectrum); the only lighting from a health and safety perspective would be to the emergency exit doors etc. Details of the lighting to sensitive receptors is secured in the Design Commitments [EN010158/APP/5.9.8]. The potential impacts on air quality from Site generated traffic is assessed in ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2.3]. A range of mitigation measures have been proposed within ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.5] and the Outline CEMP [EN010158/APP/7.2.7] to address the potential for significant adverse effects during the construction phase, at a limited number of receptors. These mitigation measures are provided to ensure compliance with the BS 5228 criteria and are secured as part of Draft DCO [EN010158/APP/3.1.9]. The specific mitigation strategy would be refined once a contractor is appointed and the construction methodology is developed.



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