

Rosefield Solar Farm

Closing Statement

EN010158/APP/8.44
August 2026
Rosefield Energyfarm Limited

APFP Regulation 5(2)(a)
Planning Act 2008
Infrastructure Planning
(Applications: Prescribed Forms
and Procedure) Regulations 2009



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1. Introduction

1.1. Purpose of the Statement

- 1.1.1. This Closing Statement has been prepared on behalf of Rosefield Energyfarm Limited ('the Applicant') to set out the Applicant's position on key matters that remain outstanding at the conclusion of the Examination of the Development Consent Order (DCO) Application for the construction, operation (including maintenance), and decommissioning of Rosefield Solar Farm (hereafter referred to as the 'Proposed Development').
- 1.1.2. This Statement demonstrates that there is a compelling case in favour of the Proposed Development being consented and that the DCO should be granted, as sought in the Application. This Statement is structured as follows:
- **Section 2** of this Statement provides a summary of the Applicant's position on key technical matters, as presented during the Examination. The key matters are included because they are matters of outstanding disagreement between the Applicant and the host authority and/or statutory bodies, or are matters which have drawn significant attention from the Examining Authority (ExA) and/or Interested Parties (IPs) during the Examination and which the Applicant considers are pertinent to the ExA recommendation and the Secretary of State (SoS) determination;
 - **Section 3** of this Statement considers key amendments to the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.9]** and the **Schedule of Changes to the Draft DCO [EN010158/APP/8.1.8]** published by the ExA on 15 July 2026. This section also summarises the final status of Protective Provisions and agreement with statutory undertakers;
 - **Section 4** summarises the Applicant's case for compulsory acquisition powers, including why powers are sought and how the Applicant has met the statutory tests; and
 - **Section 5** concludes the overall planning balance for the Proposed Development and has regard for **Sections 2, 3 and 4** of this Statement.
- 1.1.3. This Statement does not introduce new material but instead provides clarity on the Applicant's final position on matters, with reference to the previous submissions it has made. This document is not intended to set out in full the Applicant's final position on each of the matters addressed; the references provided are relied upon for this purpose.
- 1.1.4. Where applicable, this Statement signposts to the Applicant's submissions which have been made over the course of the Examination to assist the

ExA and IPs in accessing submissions the Applicant considers relevant to the technical matter(s) being discussed. The signposting is not intended to represent an exhaustive list of every submission on a given topic but draws attention to those the Applicant considers to be of most direct relevance.

1.2. The Proposed Development and the DCO Application

- 1.2.1. The Proposed Development is a Nationally Significant Infrastructure Project (NSIP) for the construction, operation (including maintenance), and decommissioning of solar photovoltaic ('PV') development and energy storage, together with associated infrastructure and an underground cable connection to the National Grid East Claydon Substation.
- 1.2.2. The Proposed Development would include a generating station with a total exporting capacity exceeding 50 megawatts ('MW').
- 1.2.3. The location of the Proposed Development is shown in **ES Volume 3, Figure 1.1: Location Plan [EN010158/APP/6.3.2] [REP2-039]**. The Proposed Development would be located within the Order Limits (the land shown on the **Works Plans [EN010158/APP/2.3.7]** within which the Proposed Development would be carried out). The Order Limits plan is provided as **ES Volume 3, Figure 1.2: Order Limits [EN010158/APP/6.3] [APP-061]**. Land within the Order Limits is known as the 'Site'.
- 1.2.4. **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.5]** contains the full description of the Proposed Development whilst the "authorised development" which is divided into work packages is provided for in Schedule 1 of the **Draft DCO [EN010158/APP/3.1.9]**. **ES Volume 1, Chapter 2: Location of the Proposed Development [EN010158/APP/6.1] [APP-045]** provides an overview of the Proposed Development's location.

1.3. The Case for the Proposed Development

- 1.3.1. Unprecedented actions are required on a global scale to halt further Climate Change. A rapid increase in the supply of low carbon electricity is urgently needed for the UK to meet its legally binding Climate Change targets. Solar generation is a critical part of the UK's strategy to achieve Net Zero by 2050 and forms a key step towards meeting the Government's national mission for 'Clean Power by 2030'. This is further explained within Section 3 of the **Statement of Need [EN010158/APP/5.6] [APP-036]**.
- 1.3.2. The NPSs for energy (specifically NPS EN-1 and NPS EN-3 (2023)) confirm that large-scale ground-mounted solar farms have a critical role to play in achieving the Government's aims. Paragraphs 3.2.6 and 3.2.7 of NPS EN-1 (2023) establish that substantial weight should be given to the need of infrastructure covered by the NPS, where paragraphs 3.3.20 to

3.3.24 of NPS EN-1 (2023) recognise that solar is a covered infrastructure-type.

- 1.3.3. Further to the substantial weight that is to be applied to covered infrastructure-types within NPS EN-1 (2023) is the fact that, across paragraphs 3.3.62 and 3.3.63 of NPS EN-1 (2023), there is an established 'critical national priority' (CNP) which is to be afforded to low-carbon infrastructure. The definition of low-carbon infrastructure extends to large-scale solar farms, such as the Proposed Development (see paragraph 4.2.5 of NPS EN-1 (2023)), because of the decarbonisation, energy security and affordability benefits that they deliver.
- 1.3.4. It is critically important to recognise that the policy presumption within NPS EN-1 (2023) that establishes that the urgent need for CNP infrastructure makes clear that this need will outweigh any residual effects in all but the most exceptional cases (see paragraph 4.1.7 of NPS EN-1 (2023)). This presumption, however, does not apply to residual impacts that present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats, or unacceptable risk to achieving Net Zero. Where no such residual impacts exist, the presumption weighs in favour of the need for CNP infrastructure. As explained through Paragraphs 9.2.1 to 9.2.7 of the **Planning Statement [EN010158/APP/5.7.6]**, none of these exceptions apply in relation to the Proposed Development and, therefore, the CNP policy applies in full.
- 1.3.5. The Proposed Development would make a significant contribution to the UK's meeting of policy commitments and legal decarbonisation targets. In addition to the generation of a significant quantity of low carbon energy (which will make a meaningful contribution to the UK's legally binding Net Zero commitment and is a source of domestic energy security that limits UK consumers exposure to volatile energy prices), the Proposed Development will also deliver:
- Proposed permanent enhancements to connectivity within the local area through the rationalising and enhancement of the network of Public Rights of Way (PRoW);
 - The creation of three permissive paths and one bridleway link;
 - Significant planting gains of approximately 8.78 hectares (ha) of structural tree planting and approximately 4,336 linear meters of structural hedgerow planting;
 - A total of 99.6 ha (which is an uplift from previous references to 88.8 ha with the removal of Solar PV development from Fields B6 and B8) of whole Fields which have been set aside as proposed areas for mitigation and/or enhancement;
 - A variety of biodiversity benefits including: new habitat for invertebrates, reptiles, amphibians, small mammals and birds; the sowing of grassland

open fields; scrub and margins with wildflower; the establishment of ecological ponds (either former ponds for recreation or new ponds as blue infrastructure works) and wider vegetated cover for foraging and dispersal, to maintain bat flight lines across the landscape, and provide a winter seed source for birds;

- A BNG that is significantly in excess of 10% and equates to a secured net gain of 40% for habitats area units, a net gain of 17% for hedgerow units, and a net gain of 10% for watercourse units;
- An estimated net addition of 420 to 470 full time equivalent construction jobs within the CLMA per year of the Proposed Development's construction;
- An estimated net addition of 18 full time equivalent operational jobs supported by the Proposed Development's operational (including maintenance) phase;
- Interpretation boards for Claydon House and Claydon Registered Park and Garden on the proposed permissive path to Knowl Hill to better reveal the significance of the assets and improve appreciation and understanding of them; and
- The provision of an **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14.3] [REP2-077]** which, among other things, provides a commitment to an Education and Skills Fund to increase opportunities in the renewable and sustainable development sector.

1.3.6. Further to the above other benefits, the Environmental Statement (ES) has also concluded a number of beneficial effects (in isolation). These can be summarised as follows:

- In **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.7]**
 - For 'Ground nesting birds', there is a significant beneficial effect at the local level across the operational (including maintenance) phase of the Proposed Development.
- In **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]**
 - For 'GHG emissions', there is a significant beneficial effect across all phases of the Proposed Development.
- In **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.5]**
 - For 'Landscape fabric (woodland, trees and hedgerows)', there is a moderate beneficial effect at Year 10 of the Proposed Development's operational (including maintenance) phase.

1.3.7. The combined nature of the additional benefits and the reported beneficial effects concluded in the ES are considered to carry substantial weight in favour of the Proposed Development.

- 1.3.8. Moreover, the limited adverse impacts of the Proposed Development in isolation after mitigation (which are limited to biodiversity, heritage and landscape and visual effects) and adverse inter-project impacts remaining after mitigation (which are limited to biodiversity and landscape and visual effects) do not outweigh the need for the Proposed Development or it's CNP nature and the substantial weighting that also ought to be afforded to the aforementioned (when combined) additional benefits and reported beneficial effects concluded in the ES.
- 1.3.9. As is detailed in **Section 2** of this Statement, the bulk of the concerns raised by the host authority and/or statutory bodies and/or IPs have been resolved through proactive engagement throughout the DCO Application's Examination.
- 1.3.10. Section 104(3) of the Planning Act 2008 requires that applications for development consent must be determined by the SoS in accordance with any relevant national policy statement except to the extent that one or more of subsections 104(4) to 104(8) apply. The Applicant points the ExA and SoS to paragraphs 10.1.8 to 10.1.13 of the **Planning Statement [EN010158/APP/5.7.6]** which explain, in turn, how none of the exceptions in these subsections apply.
- 1.3.11. With the above points and consideration of the planning balance that has been concluded in Section 10 of the **Planning Statement [EN010158/APP/5.7.6]** in mind, the Applicant considers there to be a clear and compelling case in favour of granting consent for the DCO Application. The urgent need and CNP nature of the Proposed Development substantiates the need to consent the Proposed Development whilst those other benefits, when taken together and weighted against the adverse effects, furthers the case which weighs heavily in favour of consent.

1.4. The Examination Process

- 1.4.1. The Examination of the Proposed Development commenced on 24 February 2026, following the close of the preliminary meeting, and is to close on 24 August 2026. Before and during the Examination, the Applicant has worked positively to address and resolve matters raised by the host authority, statutory consultees and other IPs. The Applicant has provided comprehensive responses at each Examination Deadline to submissions made as well as, where relevant, amendments to documents to address matters raised.
- 1.4.2. The Applicant has agreed Statements of Common Ground with key stakeholders, with the respective positions summarised in the **Statement of Commonality [EN010158/APP/5.13.6]**. Across Deadlines 5 and 6, the Applicant has submitted final and signed versions of the following Statements of Common Ground:

- **Statement of Common Ground with UKHSA [EN010158/APP/5.12.3];**
- **Statement of Common Ground with Natural England [EN010158/APP/5.14.3];**
- **Statement of Common Ground with Environment Agency [EN010158/APP/5.15.6];**
- **Statement of Common Ground with Anglian Water [EN010158/APP/5.18.2];**
- **Statement of Common Ground with High Speed 2 Limited [EN010158/APP/5.19.2] [\[REP5-020\]](#);**
- **Statement of Common Ground with National Grid Electricity Transmission Plc [EN010158/APP/5.20.2];**
- **Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6];**
- **Statement of Common Ground with Claydons Solar Action Group [EN010158/APP/5.23.4]; and**
- **Statement of Common Ground with Preston Farms Limited and TCS Biosciences [EN010158/APP/5.24].**

1.4.3. At Deadline 4, the Applicant submitted the final and signed version of the following Statement of Common Ground:

- **Statement of Common Ground – Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11.3] [\[REP4-012\]](#).**

1.4.4. At Deadline 2, the Applicant submitted final and signed versions of the following Statements of Common Ground:

- **Statement of Common Ground with Historic England [EN010158/APP/5.16.3] [\[REP4-017\]](#);**
- **Statement of Common Ground with National Trust [EN010158/APP/5.17.2] [\[REP2-020\]](#); and**
- **Statement of Common Ground with National Highways [EN010158/APP/5.21.2] [\[REP2-022\]](#).**

1.4.5. The areas of agreement and disagreement between the Applicant and the various IPs are set out in detail within the respective Statements of Common Ground. While the Applicant has been able to reach agreement with many of the IPs on the majority of the issues raised, there remain some matters of disagreement which have not been possible to resolve during the Examination. The Applicant's position on these matters, as well as that of the relevant IP, is set out in more detail in the respective Statements of Common Ground.

2. Summary of Key Issues

- 2.1.1. This Section provides summaries of the key issue-specific matters that arose from the consideration of the DCO Application during Examination and which remain unresolved at the close of Examination and which the Applicant considers to be pertinent to the ExA's recommendation and the SoS's decision.
- 2.1.2. This section is structured so that a summary of each key residual matter is provided with a position piece on the scope of the disagreement on the residual matter at the close of Examination. The Applicant's final position on the residual matter is then set out.
- 2.1.3. The key matters which are subject to disagreement and covered in this section are set out below:
- Biodiversity;
 - Cultural Heritage;
 - Cumulative Effects;
 - Landscape and Visual;
 - Noise;
 - Population and Human Health;
 - Site Design;
 - Soils; and
 - Traffic and Transport.
- 2.1.4. There are also a number of key matters which have been resolved through the Examination of the DCO Application. These can be summarised as follows:
- Land Use and Agriculture with Natural England;
 - BESS and Fire Safety; Construction; Water, Flood Risk and Drainage; Land Contamination; and Ecology and Biodiversity with the Environment Agency;
 - Cultural Heritage with Historic England and National Trust;
 - Traffic and Transport with National Highways and HS2 Limited;
 - Water, Flood risk and Drainage; and Impacts on existing apparatus/infrastructure with Anglian Water Services Limited;
 - BESS/Fire Safety with Buckinghamshire and Milton Keynes Fire Authority and UK Health Security Agency;

- Climate Change; Air Quality; PRow and Permissive Footpaths; Traffic and Transport; Water, Flood Risk and Drainage; Waste Management; and Land contamination with Buckinghamshire Council.

2.1.5. For a full list of matters which have been resolved through the Examination of the DCO Application, see the **Statement of Commonality [EN010158/APP/5.13.6]**.

2.2. Biodiversity

Summary of residual matters of disagreement at the end of the Examination

Adherence to NPS EN-1

2.2.1. The Claydons Solar Action Group (CSAG) maintain disagreement with the Applicant's assessment of the Proposed Development's compliance with paragraphs 5.4.43 and 5.4.55 within NPS EN-1 (2023) in light of the potential effects on Bechstein's bats and the likelihood of significant harm to this species.

Bechstein's Bats: Conclusions of Potentially Significant Effect

2.2.2. Both Buckinghamshire Council and CSAG maintain disagreement that the conclusions reached in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.7]** of a potentially significant effect are correct with regard for Bechstein's bats. Instead, both parties suggest that this conclusion of effect is incorrect and that a significant effect conclusion should have been reached.

Bechstein's Bats: Removal of Panels from Fields B6, B7, B8, B10 and B11 and D28 and D29

2.2.3. Both Buckinghamshire Council and CSAG maintain their objections to the Applicant's retention of Solar PV modules in Fields D28 and D29, though they have both welcomed the Applicant's removal of Solar PV modules from the B fields.

2.2.4. As indicated above and at Deadline 5, the Applicant reduced the extent of Solar PV development from Parcel 1 through the removal of Solar PV modules from the entirety of Fields B6 and B8, and the western and southern parts of Field B7; together with an increase of buffers within Field B7 alongside Sheephouse Wood and within Field B10 alongside Shrubs Wood from 30 to 50m.

2.2.5. It should be noted that Natural England are in agreement on this matter, as reflected in the **Statement of Common Ground with Natural England [EN010158/APP/5.14.3]**.

Bat Monitoring Strategy

- 2.2.6. The main point of disagreement between Buckinghamshire Council and the Applicant relates to the Bat Monitoring Strategy where it is the extent to which remedial actions should be specified in the **Outline LEMP [EN010158/APP/7.6.7]** at this point in the consenting process.

GCN Licensing

- 2.2.7. Natural England and Buckinghamshire Council maintain that the Applicant should not have two potential great crested newt (GCN) licensing options available to it and instead should commit to a preferred licensing option. This disagreement is reflected within the **Statement of Common Ground with Natural England [EN010158/APP/5.14.3]** and **Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6]** respectively).

Grazing

- 2.2.8. Natural England, Buckinghamshire Council and CSAG all maintain that the Applicant should secure a stronger commitment to grazing over and above the commitments already secured within the **Outline LEMP [EN010158/APP/7.6.7]**.

Hedgerow Buffers, Planning Policy and Measurement Reference

- 2.2.9. Natural England, Buckinghamshire Council and CSAG all maintain that hedgerow buffers should be measured from the outer edge of hedgerows and not their centre line, as proposed by the Applicant.

Hedgerow Removal and Fragmentation

- 2.2.10. Buckinghamshire Council are of the opinion that the removal of up to 2,060m of hedgerow will lead to habitat fragmentation, despite the reinstatement of most hedgerows and the provision of additional new hedgerow planting.

Ancient Woodland Buffers

- 2.2.11. Buckinghamshire Council maintain that the buffers from Ancient Woodland to development should be 50m and not 30m to accord with Policy NE8 of the Vale of Aylesbury Local Plan (VALP) 2013 – 2033.

Efficacy of Ground Nesting Bird Mitigation

- 2.2.12. Both Buckinghamshire Council and CSAG maintain concern over the efficacy of the ground-nesting bird mitigation proposed, given that the same area would also be used to deliver foraging habitat for bat species and foraging for wintering golden plover and lapwing.

Wintering Birds

- 2.2.13. CSAG maintain that the Applicant has underestimated the potential effect of wintering golden plover, lapwing and skylark and that a significant effect is likely to occur.

Biodiversity Net Gain Assessment

- 2.2.14. CSAG maintain that **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.5]** is not adequate and that its treatment of grassy arable field margins is incorrect and has, therefore, artificially reduced the BNG baseline.
- 2.2.15. CSAG also maintain doubt that the Applicant will be able to achieve a 40% gain in habitat area units.

Summary of the Applicant's Position on residual matters

Adherence to NPS EN-1

- 2.2.16. The Applicant would agree that, were there a risk of harm sufficient to cause a change in conservation status (i.e. a local extinction), then it would be appropriate to give that outcome substantial weight; however, the Applicant does not believe this to be the case given the mitigation measures proposed and secured within the **Outline LEMP [EN010158/APP/7.6.7]**.
- 2.2.17. The Applicant's final position on this matter is established against the Applicant's responses to Q2.5.8 and Q2.5.9 in **Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082]**. This position is maintained by the Applicant and is therefore of the view that the Proposed Development is compliant with the policy contained within NPS EN-1 with regard for Bechstein's bats.

Bechstein's Bats: Conclusions of Potentially Significant Effect

- 2.2.18. The Applicant maintains that the precautionary approach taken is robust and that concluding a potentially significant effect is the correct way to categorise the potential residual impact on Bechstein's bats.
- 2.2.19. The Applicant's final position and reasoning for concluding a potentially significant effect is detailed in response to Q2.5.7 in **Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082]**.

Bechstein's Bats: Removal of Panels from Fields B6, B7, B8, B10 and B11 and D28 and D29

- 2.2.20. The Applicant considers that the extent of removal of Solar PV modules from Parcel 1 at Deadline 5 is appropriate and that no further removals are necessary, and that this is best demonstrated by Natural England's agreement on the matter.
- 2.2.21. The Applicant's final position is that the removals made at Deadline 5, together with other areas that are set aside as grazed grassland (and the bespoke buffer zones), are sufficient to safeguard foraging habitat for Bechstein's bats and other bat species and that removal of panels from Fields D28 and D29 is not required. However, the Applicant has increased the width of buffers along the hedgerow linking Finemere and Runts wood ensuring no habitat fragmentation along the edge of these fields as outlined in the **Outline LEMP [EN010158/APP/7.6.7]**.
- 2.2.22. The Applicant refers the ExA and the SoS to paragraph 5.5.47 of NPS EN-1 (2023). Under this policy, the Applicant considers that there is no 'very significant benefit' to be had from a further reduction in function (i.e., partial or total loss of Solar PV modules in Fields D28 and D29) and that the agreement reached with Natural England best demonstrates this policy compliance.

Bat Monitoring Strategy

- 2.2.23. The Applicant submits that the structure of the Bat Monitoring Strategy follows nationally accepted guidelines, sets specific objectives, and commits to undertaking remedial actions where objectives are not being met. Section 7 of the **Outline LEMP [EN010158/APP/7.6.6]** sets out the requirements for the detailed Landscape and Ecological Management Plan (s) which will follow.
- 2.2.24. Post-Examination, methods to be used to test those objectives will be further developed in consultation with relevant parties. A baseline will be set that takes into account the final layout and is compatible with future data collection, and there is already in place an agreement to collaborate with HS2 who will be undertaking radio-tracking at a frequency agreed with Natural England.
- 2.2.25. Importantly, any need for remedial actions would need to take into account factors such as bat activity across the whole local landscape; local factors such as woodland health and management; results from monitoring carried out by HS2 on the same population and any emerging findings from solar research.
- 2.2.26. The only remaining disagreement therefore is the extent to which further details are required during the Examination period. As the discharging

authority for the detailed Landscape and Ecological Management Plan, Buckinghamshire Council would have a role in approving the detailed Landscape and Ecological Management Plan(s) in consultation with Natural England and therefore the Applicant is of the view that further details are not required at this stage and are not material to the determination of consent.

GCN Licensing

- 2.2.27. The Applicant acknowledges at Section 7.9 in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.7]** that a licence with regard for GCN will be required, should the DCO Application gain consent but that it is entirely reasonable for the Applicant to not commit to a preferred licensing option at this time.
- 2.2.28. The Applicant is aware that Natural England is not able to provide a Letter of No Impediment at this stage, and that the District Level Licence (DDL) offer has not been formally secured at this stage. However, discussions between the Applicant and Natural England have indicated that both licensing options are feasible. Therefore and in either eventuality, there are feasible licensing options available should Natural England go on to insist that two potential licensing routes cannot be on the table at detailed design.
- 2.2.29. As outlined and secured by the **Outline LEMP [EN010158/APP/7.6.7]**, either the DLL or a Natural England licence will be secured prior to construction; the Applicant is therefore of the view that there is no risk to GCN's were the DCO Application to obtain consent.

Grazing

- 2.2.30. The Applicant considers that appropriate commitments have been made with regards grazing of grassland within the **Outline LEMP [EN010158/APP/7.6.7]** including a commitment within **Section 7.1** to set out the grazing regime for the long-term management within the detailed Landscape and Ecological Management Plan(s).
- 2.2.31. The Applicant's final position on this is detailed against Q2.5.14 in **Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082]**.

Hedgerow Buffers, Planning Policy and Measurement Reference

- 2.2.32. The Applicant considers that measuring from the centre-line is the most sensible and practical way to measure buffer widths. Furthermore, wider linear features are accommodated through bespoke buffers and commitments in the **Outline LEMP [EN010158/APP/7.6.7]** to protecting

tree root protection areas, as well as a 5m gap between features and Solar PV modules to maintain access for maintenance etc..

- 2.2.33. The Applicant's final position on this matter is set out against Item 3 (Ecology and Biodiversity) in **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [REP3-049]**.
- 2.2.34. It is concluded that this residual matter of disagreement is one of professional judgement and not one of policy compliance.

Hedgerow Removal and Fragmentation

- 2.2.35. The Applicant submits that, with the mitigation measures outlined and secured within the **Outline LEMP [EN010158/APP/7.6.7]**, there would be no fragmentation of the hedgerow network. Instead, there would be a net gain in hedgerow biodiversity units as is reflected in **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.5]**.
- 2.2.36. The Applicant does not consider this matter to result in any non-compliance with national policy.

Ancient Woodland Buffers

- 2.2.37. The Applicant disagrees with Buckinghamshire Council and instead concludes that, given the nature of the Proposed Development, a 30m offset is sufficient to safeguard Ancient Woodlands and associated habitats.
- 2.2.38. A final position on this matter was established early on by the Applicant at Ref. 3.34 of the **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085]**.
- 2.2.39. The Applicant concludes that this residual disagreement on local planning policy compliance does not give rise to any non-compliance with the NPSs and so the SoS should commensurately weigh this against the substantial needs case which weighs in favour of the DCO Application.

Efficacy of Ground-Nesting Bird Mitigation

- 2.2.40. The Applicant's position is that the full suite of mitigation measures outlined within **Outline LEMP [EN010158/APP/7.6.7]** would be efficacious in safeguarding the population of farmland birds (which includes ground-nesting habitat) but also measures to boost invertebrate biomass during the breeding season as well as provision a source of winter seed. The Applicant maintains that these measures need to be considered as a whole and not individually.

- 2.2.41. The Applicant considers that the mitigation proposed will be effective and that there is not likely to be competition for resources by the proposed mitigation delivering more than one outcome, for the following reasons:
- golden plover and lapwing were recorded during winter bird surveys only and in small numbers;
 - therefore, there is unlikely to be a competition for resources as breeding ground-nesting birds would be using the resources at a different time of year;
 - likewise, bats forage between dusk and dawn;
 - therefore, there is unlikely to be a resource competition between these groups and grazing management would be tailored to ensure all the biodiversity and mitigation objectives are being met.
- 2.2.42. The detailed Landscape and Ecological Management Plan(s) will present the final grassland management regime, including grazing proposals that ensure the mutual benefit for all species groups. Therefore, the Applicant considers that the mitigation in **Outline LEMP [EN010158/APP/7.6.7]** will be effective.

Wintering Birds

- 2.2.43. The Applicant submits that the assessment outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.7]** is correct and that no significant impacts on wintering birds are likely.
- 2.2.44. The Applicant considers that the mitigation proposed will be effective. The Applicant's final position on this matter is detailed at length in the **Position Paper on Ground Nesting Birds and Wintering Bird [EN010158/APP/8.36] [REP5-093]** where it is explained that numerous locations within the county support significant aggregations of wintering lapwing and golden plover and that, given the local and national context of populations, the original assessment conclusions are correct and no significant effect will occur even if these species are displaced due to the proposed development.
- 2.2.45. Suitable mitigation measures are secured within the **Outline LEMP [EN010158/APP/7.6.7]** should wintering birds (golden plover and lapwing) be displaced.
- 2.2.46. The Applicant therefore concludes that this residual matter of disagreement does not give rise to any non-compliance with the NPSs and that this should be recognised as such by the ExA and SoS.

Biodiversity Net Gain Assessment

- 2.2.47. The Applicant concludes that it has a fully compliant metric that has treated grass arable field margins in the correct manner and has demonstrated that the Proposed Development will be able to fulfil its commitment to delivering a minimum 40% area habitat units, as secured by Requirement 7 of the **Draft DCO [EN010158/APP/3.1.9]**.
- 2.2.48. A final position on this matter is set out within **Position Paper on Arable Field Margins and BNG [EN010158/APP/8.37] [REP5-094]**.
- 2.2.49. In conclusion, the Applicant recognises that failure to comply with the DCO is a criminal offence and would not, therefore, commit to a minimum 40% uplift in area habitat units if the Applicant did not think this was deliverable.

2.3. Cultural Heritage

Summary of residual matters of disagreement at the end of the Examination

Levels of Harm

- 2.3.1. For the majority of heritage assets, the level of harm to their significance which would be caused by the Proposed Development is agreed with Buckinghamshire Council as stated in **Table 4 of the Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6]**. This includes assets that were scoped out of the detailed assessment of setting presented in **Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4] [REP5-059]** which found that these assets would not experience significant effects.
- 2.3.2. It is agreed with Buckinghamshire Council that the harm to the significance of the heritage assets that would be affected represents less than substantial harm. This is also set out within **Table 4 of the Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6]**.
- 2.3.3. The residual area of disagreement with Buckinghamshire Council relates to where on the scale of less than substantial harm to place the harm to Claydon House, Claydon Park, All Saint's Church, Botolph Claydon Conservation Area, Botolph House, East Claydon village, St Mary's Church, Rosehill Farmhouse and associated barns, Blackmoorhill Farmhouse, Pond Farmhouse and Bernwood Farmhouse.
- 2.3.4. Buckinghamshire Council consider that the level of less than substantial harm to the significance lies at the upper end of the range for Pond Farmhouse and Bernwood Farmhouse and within the middle of the range of less than substantial harm for the other heritage assets.

- 2.3.5. The assessment contained within **Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4] [REP5-059]** concludes that the harm to the significance of Pond Farmhouse and Bernwood Farmhouse would lie in the middle of the range of less than substantial harm and that the harm to the other assets would lie at the lower end of the range. Historic England and National Trust both concur with the Applicant's assessment of lower end of less than substantial harm to Claydon House (as set out in the **Statement of Common Ground with Historic England [EN010158/APP/5.16.3] [REP4-017]** and **Statement of Common Ground with National Trust [EN010158/APP/5.17.2] [REP2-020]**) but defer to Buckinghamshire Council on the other assets.
- 2.3.6. This difference of opinion on the scale of less than substantial harm also leads to disagreement over the significance of effect to these assets (with the exception of Bernwood Farmhouse where it is agreed that the effect would be slight and therefore not significant). Significance of effects is however only a tool within EIA to assist the decision maker with ascribing the relative weight to be given to the harm to any individual asset within the planning balance. The planning policy test relates to the level of harm only.

Summary of the Applicant's Position on residual matters

Levels of Harm

- 2.3.7. The Applicant considers that the change to the setting of Claydon House, Claydon Park, All Saint's Church, Botolph Claydon Conservation Area, Botolph House, East Claydon village, St Mary's Church, Rosehill Farmhouse and associated barns, Blackmoorhill Farmhouse, Pond Farmhouse and Bernwood Farmhouse would result in less than substantial harm and that, with the exception of Pond Farmhouse and Bernwood Farmhouse, this harm would be at the lower end of the scale. The Applicant considers that the harm to the significance of Pond Farmhouse and Bernwood Farmhouse would lie within the middle of the scale of less than substantial, as contained within **Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4] [REP5-059]**.
- 2.3.8. The Applicant refers the ExA and SoS to Appendix 1 (Detailed Cultural Heritage Response) to **Applicant's Response to Deadline 4 Submissions [EN010158/APP/8.32] [REP5-089]** which sets out the Applicant's detailed and final response on these matters of disagreement.
- 2.3.9. Both parties are in agreement that no level of harm exceeds the 'less than substantial' threshold. Therefore, the policy tests relating to 'substantial harm' are not triggered which means that the public benefits of the

Proposed Development need to be considered against the Proposed Development's cultural heritage impact.

- 2.3.10. Therefore, and in accordance with paragraph 5.9.32 of NPS EN-1 (2023) (and taking account of the principles set out under paragraphs 4.2.16 and 4.2.7 of NPS EN-1 (2023)), the substantial public benefits and critical need for the Proposed Development, including the delivery of CNP infrastructure that would contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the 'less than substantial harm' identified on designated heritage assets.

2.4. Cumulative Effects

Summary of residual matters of disagreement at the end of the Examination

Levels of Effects

- 2.4.1. Buckinghamshire Council consider that the potential inter-project cumulative effects that are expected to arise from the associated cumulative developments will have significant detrimental impacts upon the landscape and visual, biodiversity and heritage receptors identified within the ES, due to their size and scale which will fundamentally alter the rural landscape into an industrialised one.
- 2.4.2. Buckinghamshire Council does not agree that the conclusions reached by the Applicant in the ES fully reflect the likely extent and experience of cumulative effects on the ground, particularly in relation to landscape and visual receptors. Buckinghamshire Council maintain that the Applicant's assessment underestimates the cumulative harm arising from the concentration of large-scale energy infrastructure within the same landscape; and that greater weight should be given to the combined extent, interaction and perception of development.

Temporary versus Permanent Nature of the Proposed Development

- 2.4.3. Buckinghamshire Council consider that the operational phase of 40 years for the Proposed Development should not be considered as temporary in the assessment of inter-project cumulative effects. Instead, Buckinghamshire Council consider that the inter-project cumulative effects over this duration could lead to permanent consequential effects.

Summary of the Applicant's Position on residual matters

Levels of Effects

- 2.4.4. The Applicant's position is that all potential cumulative effects have been considered appropriately and does not therefore agree with

Buckinghamshire Council's position which is that unacceptable impacts are underreported and/or would be experienced across a greater extent of the district than is reported in the ES.

- 2.4.5. An explanation of the Applicant's assessment methodology for **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.4] [REP5-038]** is detailed, with an example, against Q2.8.3 of **Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082]**.
- 2.4.6. Furthermore, the Applicant's response to Ref. 3.1.14 in **Applicant's Response to Deadline 3 Submissions [EN010158/APP/8.22] [REP4-081]** explains how the approach taken in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.4] [REP5-038]** is consistent with standard EIA practice and is also in line with the PINS Advice on Cumulative Effects; and reflects a proportionate assessment based on available information.
- 2.4.7. **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.4] [REP5-038]** acknowledges that the combined interaction of neighbouring schemes would collectively contribute to a more complex and infrastructure-influenced baseline in parts of the study area, including some elevated viewpoints. The Applicant has subsequently reported a number of likely significant inter-project residual cumulative effects on landscape and visual and biodiversity.
- 2.4.8. In terms of landscape and visual, the Applicant has assessed the inter-project cumulative effects, including sequential (kinetic) effects, with other relevant developments. As presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.4] [REP5-038]** and **ES Volume 4, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.4.4] [REP5-061]**, cumulative effects have been considered in terms of the additional effects of the Proposed Development and also the combined effects of all cumulative schemes together. The Applicant therefore maintains that the worst-case cumulative effects have been considered and are reported accurately.
- 2.4.9. The **Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2.7]** commits to consulting with other developments (HS2, Grendon Underwood Prison, East Claydon BESS and East Claydon Greener Grid Park) prior to construction, on programmes and at the discharge of requirements phase to manage interactions and reduce any associated potential cumulative impacts, where practicable.
- 2.4.10. With the above in mind, the Applicant is confident that **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.4] [REP5-038]** is: compliant with the EIA Regulations; does not underreport effects and

therefore accords with paragraph 4.3.3 of NPS EN-1 (2023). This means that the Applicant's assessment of the Proposed Development's compliance with topic-specific cumulative decision-taking paragraphs (such as paragraph 5.14.21 in NPS EN-1 (2023)) is accurate in the **Planning Statement [EN010158/APP/5.7.6]**.

Temporary versus Permanent Nature of the Proposed Development

- 2.4.11. The Applicant considers that operational impacts would be temporary as the Proposed Development would be decommissioned after the 40-year operational lifespan and the land would be reinstated and returned back to the landowner.
- 2.4.12. The Applicant's final position on this matter is set out against Ref. 3.19 in **Applicant's Response to Deadline 4 Submissions [EN010158/APP/8.32] [REP5-089]**. See also the Applicant's position in Table 5 of the **Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6]**.
- 2.4.13. It should also be recognised that the Applicant's approach is consistent with the NPS and the approach taken on other consented Solar DCO projects. Example projects include Springwell Solar Farm and Peartree Hill Solar Farm.
- 2.4.14. Paragraph 2.10.66 of NPS EN-3 (2023) recognises that "*Time limited consent, where granted, is described as temporary because there is a finite period for which it exists*". This position in policy is clearly articulated and so this residual disagreement between the Applicant and Buckinghamshire Council should not carry any weight.

2.5. Landscape and Visual

Summary of residual matters of disagreement at the end of the Examination

Application of Professional Judgement

- 2.5.1. The Applicant has liaised with Buckinghamshire Council's Landscape Officers in relation to the assessment and mitigation of landscape and visual effects during the pre-application, pre-Examination and Examination stages, as captured in Table 10.1 of **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.5]** and **Table 6 of the Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6]**. As is recorded within the **Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6]**, agreement has been reached with Buckinghamshire Council regarding the study area, assessment methodology and the scope of landscape and visual receptors.

- 2.5.2. Whilst Buckinghamshire Council agrees with the Applicant where effects have been described as significant, there is residual disagreement as to the level of overall effects. In particular, Buckinghamshire Council disagree with the Applicant's application of professional judgement with regard to public rights of way and landscape character across the Claydon Bowl, Hogshaw Claylands, Twyford Vale and parts of the Quainton-Wing Hills Area of Attractive Landscape.
- 2.5.3. In addition, Buckinghamshire Council consider that the villages of Steeple Claydon, Botolph Claydon and Granborough are likely to experience permanent significant adverse landscape and visual effects.
- 2.5.4. The Applicant has liaised with Buckinghamshire Council's Landscape Officers in relation to the assessment and mitigation of landscape and visual effects during the pre-application, pre-Examination and Examination stages, as captured in Table 10.1 of **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.5]** and **Table 6 of the Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6]**. As is recorded within the **Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6]**, agreement has been reached with Buckinghamshire Council regarding the study area, assessment methodology and the scope of landscape and visual receptors.

Summary of the Applicant's Position on residual matters

Application of Professional Judgement

- 2.5.5. The Applicant is confident that the judgement of effects undertaken within **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.5]** accords with industry standard methodology, specifically the Guidelines for Landscape and Visual Impact Assessment, Third Edition. Resultingly, the Applicant does not agree with Buckinghamshire Council in that there are effects which have been under assessed and, therefore, the Applicant stands behind its assessment of significant effects.
- 2.5.6. The Applicant's above and final position was established early in Examination through a response to Q1.15.13 in **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]**.
- 2.5.7. Therefore, it is concluded that **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.5]** has been produced in accordance with the relevant requirements of a landscape and visual assessment as set out under paragraphs 5.10.17 and 5.10.20 to 5.10.22 in NPS EN-1 (2023). The Applicant is also confident that professional judgement has been exercised in accordance with paragraph 5.10.16 of

NPS EN-1 (2023) which recognises that the Guidelines for Landscape and Visual Impact Assessment (Third Edition) is an applicable and appropriate guide for the assessment of the Proposed Development.

- 2.5.8. As such, the Applicant considers that the ExA and SoS should be satisfied by the Applicant's assessment.

2.6. Noise

Summary of residual matters of disagreement at the end of the Examination

Application of Operational Phase Assessment Criteria and Guidance

- 2.6.1. Buckinghamshire Council are concerned by the setting of the lowest observed adverse effect level (LOAEL) at 40dB(A) in the daytime and 35dB(A) in the night-time specifically in the tranquil areas demonstrated in **ES Volume 4, Appendix 13.1: Baseline Noise Survey [EN010158/APP/6.4] [APP-127]**. BS 4142 recognises that both absolute and relative increases in sound level should be taken into account, and that it should not be the case that one is exclusively preferred over the other. Buckinghamshire Council recognise that this requires an exercise of judgment and that particularly tranquil areas give rise to difficulties in assessment.
- 2.6.2. Given that some reference locations experience increases above the measured background sound level of 10dB plus, and given the effects of noise on PRow's, Buckinghamshire Council maintains concern that the wrong balance has been struck by the Applicant in applying BS 4142 in some instances and, as a result, the real world impact on some receptors given the context and the characteristics of the noise is not properly accounted for in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.5]**.
- 2.6.3. As a result, Buckinghamshire Council accepts the magnitude of impact and likely significant effects for the most part, but maintains disagreement with the magnitudes of impact identified and resulting conclusions of likely significant effects for particularly tranquil locations.

Operational Phase Noise Levels Affecting PRow Users

- 2.6.4. Buckinghamshire Council remains of the view that the operational phase noise levels incident upon PRow's result in important negative effects by way of the Proposed Development. This position is captured under Ref. 9-2 within the **Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6]**.

Noise and Vibration Levels Affecting PFL/TCS Operations

- 2.6.5. Preston Farms Limited and TCS Biosciences Limited (PFL/TCS) maintain concern that noise and vibration during both construction and operation (including maintenance) phases of the Proposed Development present likely significant effects on, and unacceptable risk to, their livestock and its donor blood, and their operations.

Summary of the Applicant's Position on residual matters

Application of Operational Phase Assessment Criteria and Guidance

- 2.6.6. The Applicant considers that the assessment methodology adopted reflects a precautionary approach with regard for the prediction of noise levels from the Proposed Development. The Applicant's approach, methodology and conclusions are set out in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.5]**.
- 2.6.7. Final positions on this matter of disagreement from the Applicant's perspective can be found against the Applicant's response to Buckinghamshire Council at Ref. 3.27 of **Applicant's Response to Deadline 4 Submissions [EN010158/APP/8.32] [REP5-089]** and previously against Ref 3.4.56 of **Applicant's Response to Deadline 3 Submissions [EN010158/APP/8.22] [REP4-081]**. These position pieces explain, in summary, that:
- Taking account of the acoustic context is a key part of a BS 4142 assessment, particularly where background noise levels and rating levels are low and the absolute level of sound may be as important as (or more important than) the difference between them; and
 - Whilst BS 4142 does not define 'low' in the context of background sound levels nor rating levels, the Association of Noise Consultants suggest that background levels of less than circa. 30dB L_{A90} and rating levels of less than about 35dB(A) would be a reasonable indication.
- 2.6.8. **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.5]** therefore adopts an external rating level of 35dB(A) (inclusive of penalties for characteristics such as hums) as the LOAEL for the night-time period; whereby noise can be heard, but it does not cause any change in behaviour, attitude or give rise to any other physiological response. At this rating level, there may be a slight effect on the acoustic character of the area but not such that there is a change in the quality of life.
- 2.6.9. This approach aligns with many other consented NSIPs that have applied a similar approach due to low background sound levels. The Applicant refers the ExA and the SoS to the response provided for against Q2.13.1 in **Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082]**.

- 2.6.10. In summary, the methodology framing the assessment contained within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.5]** reflects a precautionary and well preceded approach and is fundamentally compliant with paragraphs 5.12.6 and 5.12.9 of NPS EN-1 (2023). Therefore, the Applicant is confident that the assessments' conclusions are compliant with paragraph 5.12.17 of NPS EN-1 (2023).

Operational Phase Noise Levels Affecting PRow Users

- 2.6.11. There are no quantitative assessment thresholds for the determination of adverse effects on PRowWs.
- 2.6.12. The Applicant refers the ExA and the SoS to the response provided for against Q2.13.4 in **Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082]** as this offers the Applicant's final position on the request from Buckinghamshire Council for further assessment of noise effects on PRow users during the operation (including maintenance) phase of the Proposed Development.
- 2.6.13. During the operation (including maintenance) phase, noise from the Proposed Development would be significantly lower than that generated during construction and the proposed sources of noise (e.g., inverters, BESS containers, transformers) would be mitigated for by the secured measures proposed within the DCO Application; where such measures include the use of low-noise units and perimeter barriers (see the **Outline Operational Environmental Management Plan (Outline OEMP) [EN010158/APP/7.3.6] [REP5-069]** and the Design Commitment D19 within **Design Commitments [EN010158/APP/5.9.8]** respectively). Perceptible sound from the Proposed Development would be attributable to items of noise-generating infrastructure which are localised in the context of the wider Order Limits and PRow network.
- 2.6.14. PRow users are naturally transitory, with people typically not staying in a given location for a prolonged period of time. As a result, the change in noise relative to the prevailing ambient sound levels along the PRow network would be limited and therefore significant adverse effects are not expected.
- 2.6.15. Therefore, the Applicant is confident that the conclusions within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.5]** are compliant with paragraph 5.12.17 of NPS EN-1 (2023).

Noise and Vibration Levels Affecting PFL/TCS Operations

- 2.6.16. The Applicant confirms that, during the construction phase, the Applicant will liaise with PFL/TCS during the preparation of the detailed Construction Environmental Management Plan to establish tailored acoustic mitigation measures that account for the location(s) of the donor herd and the nature

of the works, with consideration of the acoustic characteristics that are more likely to result in negative impacts.

- 2.6.17. Section 2 of the **Outline CEMP [EN010158/APP/7.2.7]** secures that, among other related measures, the Applicant will liaise with PFL/TCS during the construction phase, providing at least six months advance notification of the location and timing of any construction activities in proximity to the Prestons' grazing land.
- 2.6.18. By example, the acoustic mitigation strategy would be discussed with PFL/TCS in advance of the works taking place, as part of the detailed Construction Environmental Management Plan preparation and during the six-month advance notification/consultation process. During this period, the presence of the livestock within the grazing fields would be a key factor in terms of the mitigation that would be adopted.
- 2.6.19. In relation to the operation (including maintenance) phase, the Applicant confirms that it will liaise with PFL/TCS in the preparation of the detailed Operational Environmental Management Plan. Measures to be included in the production of the detailed Operational Environmental Management Plan include providing at least six months' of advance notification of the location and timing of any maintenance activities in proximity to the Prestons' grazing land. This is secured in Section 2 of the **Outline OEMP [EN010158/APP/7.3.6] [REP5-069]**.
- 2.6.20. With the above in mind, the Applicant is confident that the key noise and vibration policy test in decision taking (see paragraph 5.12.17 of NPS EN-1 (2023)) is satisfied.

2.7. Population and Human Health

Summary of residual matters of disagreement at the end of the Examination

Methodology and Level of Assessment (Human Health)

- 2.7.1. Buckinghamshire Council and the Applicant remain in disagreement over the following matters:
- the presentation of health effects in an appendix to the ES, rather than in a stand-alone Health Impact Assessment or ES chapter;
 - the application of ISEP Guidance relating to Social Impact Assessment in EIA;
 - the consideration of a clear and transparent assessment of effects on mental health and wellbeing; and
 - the reporting of in-combination effects on health and wellbeing.

Biosecurity Matters

- 2.7.2. PFL/TCS maintain concern over the Applicant's proposed biosecurity measures employed across the Proposed Development for the safeguarding of their operations. The biosecurity concerns relate to PFL/TCS' donor-animal operation and are specifically framed around concerns for: possible disease transfer risks during the Proposed Development's construction phase, possible soil contamination and the movement of materials across the Site; a need for controls on contractors and vehicle movements; a need to establish a robust system for reporting incidents and their management and further consultation requirements between the Applicant and PFL/TCS in the preparation of the detailed Biosecurity Management Plan.

Summary of the Applicant's Position on residual matters

Methodology and Level of Assessment (Presentation of Health Effects)

- 2.7.3. The Applicant considers that **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.7] [REP5-065]** carries the same importance as those other elements of the Environmental Statement (ES) which includes 'stand alone' chapters since the ES should be read as a whole.
- 2.7.4. It is the Applicant's position that **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.7] [REP5-065]** demonstrates a compliant assessment that been undertaken in line with ISEP (formerly IEMA) guidance, whilst also taking into account Buckinghamshire Council's advice during the pre-application and Examination period.
- 2.7.5. Importantly, the Applicant's approach to the ES has been undertaken in accordance with the Scoping Report. The Planning Inspectorate agreed that human health could be scoped out of the ES (see page 18 of **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4] [APP-080]**) on the basis that the ES should still clearly set out potential impacts to human health from the Proposed Development and cross-reference where impacts are considered and assessed within other relevant chapters of the ES, with any relevant mitigation measures secured within management plans.
- 2.7.6. To the above, Buckinghamshire Council have acknowledged that there have been methodological improvements in the approach to the reporting of health and wellbeing effects through revisions to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.7] [REP5-065]** during Examination. Buckinghamshire Council noted in their LIR Addendum **[REP2-092]** submitted at Deadline 2 that they:

- agree, on the basis of the Health Effects Report provided as Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.7] [REP5-065]** provided at Deadline 1, that for the regulated physical health pathways of: air quality, noise and vibration, traffic and access, land contamination and operational safety, no significant residual adverse effects are predicted following mitigation (subject to the delivery of the proposed design measures, DCO requirements and management plans); and
- are satisfied that the majority of the mitigation relied upon in Section 6 of the Health Effects Report provided as Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.7] [REP5-065]** provided at Deadline 1 are adequately secured through the secured documents.

- 2.7.7. Consideration of health impacts has been had across the ES Chapters such as, but not limited to: **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.5]**, **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.5]**, **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.5]** and **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]**.
- 2.7.8. Following discussion at Issue Specific Hearing 3, the Applicant took an action to update the **Non Technical Summary [EN010158/APP/6.4.2] [REP5-048]** to include a summary of effects of the Proposed Development on health and wellbeing. The Applicant submitted this at Deadline 5.
- 2.7.9. With the above in mind, the Applicant concludes that the presentation and assessment of health effects is compliant with paragraphs 4.3.10 and 4.3.13 of NPS EN-1 (2023).

Methodology and Level of Assessment (Application of Guidance)

- 2.7.10. The Applicant considers that the assessment has been undertaken in accordance with relevant legislation, policy and guidance relating to the assessment of human health effects, as set out within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.7] [REP5-065]**.
- 2.7.11. The Applicant's final position on this matter can be found against Agenda Item 12 (health) and the Applicant's address of Action Points 34 and 36 in **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) [EN010158/APP/8.33] [REP5-090]**.
- 2.7.12. The responses provided for by the Applicant against Q2.10.2 in **Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082]**) and against Ref. 3.4.47 in **Applicant's Response to Deadline 3 Submissions**

[EN010158/APP/8.22] [REP4-081] further support the Applicant's final position.

- 2.7.13. The Applicant is confident that **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.7] [REP5-065]** reflects an appropriate assessment that is suitably qualified by the relevant guidance.

Methodology and Level of Assessment (Effects on Mental Health and Wellbeing)

- 2.7.14. The Applicant's position is that effects on mental health and wellbeing are appropriately considered and transparently reported in accordance with legislation, policy and guidance within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.7] [REP5-065]**.
- 2.7.15. Section 5 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.7] [REP5-065]** and Section 7 of Annex A (Health Effects Report) to the Summary Statement provide dedicated assessments of mental health and wellbeing, drawing on definitions published by the World Health Organisation (WHO), evidence on mental health determinants from public health bodies, and ISEP (formerly IEMA) guidance on the scoping and assessment of health effects.
- 2.7.16. The Applicant's oral submissions made against Agenda Item 12 (health) (see **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) [EN010158/APP/8.33] [REP5-090]**) provides the final position of the Applicant on this matter.
- 2.7.17. Using best practice from ISEP (formerly IEMA) and scientific literature, the Applicant's consideration of mental health pathways has taken account of concerns raised by local communities and stakeholders during the pre-application and Examination process, including matters relating to engagement and consultation, landscape change, recreation and access, employment and socio-economic effects, residential amenity, and perceived health effects associated with electromagnetic radiation.
- 2.7.18. The Applicant has engaged and consulted with the community and stakeholders during the pre-application stage to understand sensitivities, amend the design, develop approaches to ES impact assessments, and develop mitigation by management plans as set out in the **Consultation Report [EN010158/APP/5.1] [APP-020]** and the **Design Approach Document [EN010158/APP/5.8.3] [CR1-014]**.
- 2.7.19. A key factor in supporting mental health and wellbeing is ensuring that, following DCO consent and commencement of works, communities can continue to understand, monitor and influence the Proposed Development

(e.g. via the detailed Construction Environmental Management Plan and detailed Construction Traffic Management Plan). This promotes transparency and accountability while enabling local knowledge to inform the delivery of long-term enhancement measures (e.g. via the detailed Landscape and Ecological Management Plan).

- 2.7.20. While cognisant that mental health and wellbeing is individual, subjective and experienced through a range of external factors beyond the Applicant's control, the Applicant considers that the approach taken to: provide information and engage and consult; clearly and transparently assess and mitigate significant environmental effects and secure enhancement measures demonstrates that appropriate measures will be employed to mitigate potential effects on mental health and wellbeing at a sub-population scale. As such, the Applicant concludes that its approach is compliant with Section 4.4 of NPS EN-1 (2023).

Methodology and Level of Assessment (In-combination Effects)

- 2.7.21. The Applicant considers that the assessment of in-combination effects on health and wellbeing is proportionate, robust and consistent with recognised practice on comparable NSIP solar projects. As noted in response to Action Point 35 in **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) [EN010158/APP/8.33] [REP5-090]**, examples include but are not limited to: Springwell Solar Farm, Stonestreet Green Solar Farm, Heckington Fen Solar Farm, Oaklands Farm Solar Park, Byers Gill Solar, Fenwick Solar Farm, Cleve Hill Solar Park, and Little Crow Solar Park.
- 2.7.22. The Applicant's final position on the soundness of the assessment of in-combination effects is provided for in response to Action Point 35 in **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) [EN010158/APP/8.33] [REP5-090]**.
- 2.7.23. With the Applicant's position in mind, the Applicant is confident that the SoS will be capable of concluding that the Proposed Development is compliant with the relevant policy tests set out under Section 4.4 of NPS EN-1 (2023) and that the residual disagreement between Buckinghamshire Council and the Applicant is founded on the presentation of effects as opposed to the effects that are being concluded. This is an important distinction as the latter would influence the planning the balance whilst the former does not.

Biosecurity Matters

- 2.7.24. The Applicant is confident that, through discussions with PFL/TCS, the range of biosecurity measures committed to within the **Outline Biosecurity Management Plan [EN010158/APP/8.39] [REP5-096]** which was submitted at Deadline 5 are suitable to safeguard PFL/TCS'

operations, in accordance with PFL/TCS' Deadline 4 Submission [\[REP4-104\]](#).

2.7.25. The **Outline Biosecurity Management Plan [EN010158/APP/8.39]** [\[REP5-096\]](#) seeks to:

- Adequately reduce the risk of pathogens, contaminants or potentially harmful material being transferred between the Proposed Development and PFL/TCS;
- Maintain a clear physical and operational separation between the works and activities forming part of the Proposed Development and PFL/TCS;
- Coordinate access and construction activities so that animal movements and sensitive operations can take place safely;
- Ensure that personnel understand the sensitivity of the interface and comply with role-specific controls;
- Provide proportionate monitoring, audit, incident response and corrective-action procedures;
- Provide an independent veterinary source of advice where specialist judgement is required;
- Maintain adequate records to demonstrate compliance without disclosing unnecessary personal, confidential or security-sensitive information; and
- Support effective and timely communication between the Applicant and PFL/TCS.

2.7.26. A detailed Biosecurity Management Plan will be prepared in consultation with PFL/TCS, as secured via Requirement 20 of the **Draft DCO [EN010158/APP/3.1.9]**.

2.7.27. The **Outline Biosecurity Management Plan Explanatory Note** provided as Appendix 1 to the **Applicant's Response to Deadline 4 Submissions [EN010158/APP/8.32]** [\[REP5-089\]](#), submitted at Deadline 5, explains how the Applicant has had regard for and responded to the biosecurity measures requested by PFL/TCS.

2.7.28. Therefore, the Applicant concludes that the assessment of the Proposed Development's socio-economic impacts and mitigation measures relating to biosecurity matters accord with paragraph 5.13.4 of NPS EN-1 (2023) and Section 5.13 of that NPS more widely.

2.7.29. The Applicant is confident that when the SoS has regard for the potential socio-economic impacts of the Proposed Development in decision making (as per the tests in paragraphs 5.13.9 and 5.13.10 of NPS EN-1 (2023)), the residual matters of disagreement are satisfied where the SoS is

proposed (by the Applicant) to be the discharging authority for Requirement 20 of the **Draft DCO [EN010158/APP/3.1.9]**.

2.8. Site Design

Summary of residual matters of disagreement at the end of the Examination

Location of the BESS

- 2.8.1. Buckinghamshire Council maintain concern with the location of the BESS in Fields D8 and D9, due to the perceived effects of the BESS with regards to noise, activity and perception. Buckinghamshire Council maintain a preference for BESS to be located in Parcel 3 (i.e., closer to the National Grid East Claydon Substation and emerging concentration of energy infrastructure in that area).
- 2.8.2. Through Buckinghamshire Council's Relevant Representation [\[RR-026\]](#), it was first introduced that *"the Council considers key changes should be made to the scheme, including moving the battery energy storage system"*.
- 2.8.3. Notwithstanding this, Buckinghamshire Council acknowledged through a Deadline 4 submission that Fields E10 and E11 (within Parcel 3) are constrained, having had regard to the Applicant's further material (see Page 5 of Buckinghamshire Council's Comments on Applicant's Documents submitted at Deadline 3 [\[REP4-092\]](#)). However, they maintain their objection to the BESS' location on the basis that they consider that the BESS is not appropriate in principle in this location, and that the impacts are greater than the Applicant has suggested.
- 2.8.4. The location of the BESS remains a matter of disagreement within the **Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6]**.

Summary of the Applicant's Position on residual matters

Location of the BESS

- 2.8.5. The Applicant is confident that the location of BESS in Parcel 2 and the design rationale guiding its location is suitable. The Applicant also confirms that reasonable alternatives have been appropriately considered and discounted in consultation with key stakeholders and through wider public consultation.
- 2.8.6. The design process that the Applicant went through to determine the most appropriate location for the BESS is reflected within **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]**

[APP-047] and the **Design Approach Document [EN010158/APP/5.8.3] [CR1-014]**.

- 2.8.7. **Appendix 1** (Letter to Buckinghamshire Council on BESS Locations) to **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085]** ties together the evidence guiding the design rationale for the location of the BESS through the Phase One, Phase Two and Targeted Consultations. It also includes consideration of how Fields D8 and D9 are some of the larger, flatter and lowest lying fields within Parcel 2, meaning that the BESS would be set down into the landscape when viewed from the east and south which, in turn, would reduce its prominence on the skyline and reduce effects on Middle Claydon Conservation Area.
- 2.8.8. This rationale was expanded on in relation to the unsuitability of land in Parcel 3 for the BESS, particularly Fields E10 and E11, in the **Applicant's Response to Action Point 7 from ISH1 [EN010158/APP/8.19] [REP3-052]**. Ref. 3.3 within **Applicant's Response to Deadline 4 Submissions [EN010158/APP/8.32] [REP5-089]** also provides key evidence that National Grid Electricity Transmission Limited (see **[REP4-098]**) agree with the Applicant's position that Fields E10 and E11 (within Parcel 3) are constrained for BESS.
- 2.8.9. The Applicant's final position on the location of the BESS is detailed within **Applicant's Response to Action Point 7 from ISH1 [EN010158/APP/8.19] [REP3-052]**. Despite there being disagreement between the Applicant and Buckinghamshire Council on the location of BESS, the Applicant is confident that the ExA and SoS can be satisfied that the BESS' location reflects good design, in accordance with paragraphs 4.7.10 to 4.7.13 of NPS EN-1 2023.
- 2.8.10. The position of the Applicant in paragraph 2.8.9 above is further supported by paragraphs 4.3.28 and 4.3.29 of NPS EN-1 (2023) which make clear that alternative proposals that are "*vague or immature can be excluded on the ground that they are not important and relevant to the Secretary of State's decision*" and that such alternatives should be identified "*before an application is made to the Secretary of State*". Buckinghamshire Council have not provided a detailed or mature alternative and, resultingly, the outstanding disagreement should not be considered relevant to the SoS in decision-taking.

2.9. Soils

Summary of residual matters of disagreement at the end of the Examination

Magnitude of Impact

- 2.9.1. Buckinghamshire Council maintain disagreement, as reflected within Table 8 of **Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6]**, with the Applicant's classification of the magnitude of effect on ALC Grade 2 land as negligible, and instead assert that it should instead be classified as minor.

Soils Classification

- 2.9.2. Buckinghamshire Council maintain disagreement with the Applicant's classification of the clay soils across the Order Limits as having medium resilience to structural damage, as reported in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.5]**, and instead assert that the soils should be classified as having low resilience.
- 2.9.3. **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.5]** notes that the majority of the soils within the Order Limits are heavy clay loam or clay topsoils over clay subsoils. In accordance with Table 4: Sensitivity of Soil Receptors; in the 2022 IEMA guidance 'A New Perspective on Land and Soil in Environmental Impact Assessment', the Applicant has classified these soils as having medium resilience to structural damage based on the soil texture and field capacity days (see **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.5]**), which has informed the topsoil handling units outlined in paragraph 2.2.8 of the **Outline Soil Management Plan (Outline SMP) [EN010158/APP/7.7.4] [REP5-077]**.

Summary of the Applicant's Position on residual matters

Magnitude of Impact

- 2.9.4. The Applicant considers that the magnitude of effect during the construction phase on the 3.01ha of ALC Grade 2 land within the Order Limits is negligible based on the 2022 IEMA guidance 'A New Perspective on Land and Soil in Environmental Impact Assessment'.
- 2.9.5. Final positions from the Applicant on this matter can be found against Ref. 3.36 in **Applicant's Response to Deadline 4 Submissions [EN010158/APP/8.32] [REP5-089]** and against item 9 (soils) and the Applicant's response to Action Point 38 in Section 3 of the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) [EN010158/APP/8.33] [REP5-090]**. The Applicant's oral submissions confirmed that a sensitivity test has been included and how the Applicant's assessment would change were the magnitude of effect on ALC Grade 2 land classified as minor. Ultimately, it was concluded by the Applicant that this would not affect the planning balance which would remain firmly in favour of approval of the DCO Application.
- 2.9.6. Though there is disagreement between the Applicant and Buckinghamshire Council on the magnitude of effect on ALC Grade 2

land, the Applicant is confident in its interpretation of the 2022 IEMA guidance and that the conclusions within **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.5]** are robust.

Soils Classification

- 2.9.7. The Applicant maintains that the classification of clay soils as having a medium resilience to structural damage is correct, given the climate of the Site and how the field capacity days correspond to Table 4: Sensitivity of Soil Receptors; in the 2022 IEMA guidance 'A New Perspective on Land and Soil in Environmental Impact Assessment'.
- 2.9.8. A final position on this matter of disagreement with Buckinghamshire Council is set out against Ref. 3.36 in **Applicant's Response to Deadline 4 Submissions [EN010158/APP/8.32] [REP5-089]**.
- 2.9.9. In summary, Buckinghamshire Council favour the Institute of Quarrying's 2021 'Good Practice Guide for Handling Soils in Mineral Workings' guidance which instructs that climate should be taken into account when assessing soil resilience, but it does not give specific field capacity day ranges in relation to resilience.
- 2.9.10. Notwithstanding, Buckinghamshire Council is content that mitigation measures outlined in the **Outline SMP [EN010158/APP/7.7.4] [REP5-077]** are sufficient to protect soils from damage during handling and storage throughout the lifetime of the Proposed Development and this position is reflected in Table 8 of the **Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6]**.
- 2.9.11. The Applicant's final position on matters of soil classification is that the mitigation measures proposed in the **Outline SMP [EN010158/APP/7.7.4] [REP5-077]** are both agreed with Buckinghamshire Council and principally compliant with the policy tests established within paragraphs 5.11.13 and 5.11.14 of NPS EN-1 (2023) and 2.10.34 of NPS EN-3 (2023). Further, the **Outline SMP [EN010158/APP/7.7.4] [REP5-077]** confirms that soil handling and soil storage will be undertaken as per the DEFRA 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites', in accordance with paragraph 2.10.127 of NPS EN-3 (2023).

2.10. Traffic and Transport

Summary of residual matters of disagreement at the end of the Examination

Construction Traffic Routing

- 2.10.1. There remains disagreement between the Applicant and PFL/TCS in relation to the access route for construction traffic to the Site.

Summary of the Applicant's Position on residual matters

Construction Traffic Routing

- 2.10.2. The Applicant's position on this residual matter is that PFL/TCS' concerns relate to land and biosecurity matters and do not, therefore, relate to traffic and transport.
- 2.10.3. The Applicant's final position on this matter is set out in **Applicant's Response to Preston Farms and TCS Biosciences Ltd's Deadline 5 Submission [EN010158/APP/8.43]** which has been provided for at Deadline 6 and responds directly to PFL/TCS' Deadline 5 submission (see [\[REP5-111\]](#)).
- 2.10.4. The Applicant also points to the **Outline Biosecurity Management Plan [EN010158/APP/8.39] [REP5-096]** which was provided at Deadline 5 and addresses land access and biosecurity matters.
- 2.10.5. The Applicant concludes that, whilst there remains disagreement between PFL/TCS and the Applicant on this matter, the technical matters have been satisfied with all statutory bodies and that the Proposed Development resultingly satisfies paragraph 5.14.21 of NPS EN-1 (2023) which is the key traffic and transport decision taking policy for the SoS to consider.

3. Draft Development Consent Order

3.1. Key amendments to the Draft DCO

- 3.1.1. The Applicant has included new provisions in the **Draft DCO [EN010158/APP/3.1.9]** in response to submissions from the Environment Agency and PFL/TCS and to facilitate the provision of a bridleway link to address an access request raised by Buckinghamshire Council.
- 3.1.2. **Article 18 (temporary enjoyment of footpath QUA/41/1 as though it were a bridleway)** facilitates a link between the existing dead-end bridleway ECL/10/5 to the north of Field D27 to bridleway QUA/40/2 and bridleway QUA/40/3 that run along the southern edge of Fields D28 and D29 ('the bridleway link'). The bridleway link addresses an access request raised by Buckinghamshire Council in its Local Impact Report **[REP1-112]** and comprises of two components:
- a permissive path (as identified by the dark blue line between PP-A8 and PP-A9 on the on the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4.5] [REP4-005]**) secured by Requirement 16; and
 - footpath QUA/41/1 (as identified on the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4.5] [REP4-005]**) with Article 18 authorising temporary use of that footpath as a bridleway subject to certain conditions.
- 3.1.3. Article 18 sets out when the right for a person to use footpath QUA/41/1 as though it were a bridleway is conferred and when it terminates. The Article includes notice requirements and clarifies how the powers under the Article interact with relevant presumptions in law arising from footpath QUA/41/1 being shown and described as a footpath in the definitive map and statement. The Article also provides that for the period footpath QUA/41/1 is to be used as a bridleway, it remains subject to the statutory functions of relevant authorities including the highway authority, the traffic authority, and the street authority and any other person entitled to exercise functions in respect of it.
- 3.1.4. **Article 50 (limits of deviation)** (and subsequent amendments to Schedule 12 (Hedgerow to be removed) provides for flexibility in the location of the permanent access point on Granborough Road (depicted as an orange box and marked 'AS-A1' between points AC-A1 and AC-A2 on the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4.5] [REP4-005]**) to be moved by up to 50 metres to the east of its current position.
- 3.1.5. The Applicant inserted this new provision at Deadline 5 in response to representations made by PFL/TCS at Issue Specific Hearing 3 (ISH3)

about the location of the access. The extent of the deviation provides for sufficient visibility splays, whilst ensuring that the junction is not located in areas of ecological constraint. The detailed design of this access junction must be submitted to the appropriate highway authority for approval.

- 3.1.6. **Requirement 19 (design flood extent)** provides that no part of the Proposed Development may commence within the design flood extent until it has been demonstrated that the Proposed Development will not worsen flooding or, if any floodplain is lost, that equivalent flood storage will be provided through a mitigation plan which includes a floodplain compensation scheme.
- 3.1.7. The Applicant inserted this new Requirement at Deadline 5 to address concerns relating to development in the design flood extent expressed by the Environment Agency in its submission at Deadline 4 [\[REP4-100\]](#). The Environment Agency supports and agrees with the new Requirement as set out in the **Statement of Common Ground with Environment Agency** [\[EN010158/APP/5.15.6\]](#).
- 3.1.8. **Requirement 20 (biosecurity management plan)** stipulates that no part of the Proposed Development located within the biosecurity area may commence until a Biosecurity Management Plan for that part has been submitted to and approved by the SoS. The “biosecurity area” is defined in Article 2 by reference to **ES Volume 3, Figure 2.4: Field Numbering System** [\[EN010158/APP/6.3.2\]](#) [\[AS-020\]](#) to include all of the fields that PFL currently holds a leasehold interest in within the Order Limits, together with all fields adjacent to those fields within the Order Limits, and as shown as the area shaded orange on the **Biosecurity Area Plan** [\[EN010158/APP/2.7\]](#) [\[REP5-005\]](#). The **Biosecurity Area Plan** [\[EN010158/APP/2.7\]](#) [\[REP5-005\]](#) will be a certified document.
- 3.1.9. This new Requirement secures essential biosecurity outcomes, minimum controls and governance arrangements for works conducted within the biosecurity area by seeking to prevent avoidable cross-contamination, control the interface between the Proposed Development and PFL/TCS operations, and provide for effective communication and incident response arrangements. The Applicant considers that this, in turn, reasonably and appropriately reduces the potential effects of the Proposed Development on the biosecurity risks to animals used in PFL/TCS’ specialist operations and the consequential impacts on their associated regulated business activities. The Applicant is confident that the Applicant has satisfied the tests in paragraphs 5.13.9 and 5.13.10 of NPS EN-1 (2023) with respect to matters between PFL/TCS and the Applicant, particularly as the SoS is proposed (by the Applicant) to be the discharging authority for Requirement 20 of the **Draft DCO** [\[EN010158/APP/3.1.9\]](#).

3.2. Applicant's Position on ExA's Suggested Drafting Changes

- 3.2.1. The ExA published its proposed changes to the **Draft DCO [EN010158/APP/3.1.9]** on 15 July 2026, and the Applicant set out its detailed response at Deadline 5 in the **Applicant's Response to the Examining Authority's Schedule of Changes to the draft DCO [EN010158/APP/8.38] [REP5-095]**. The Applicant accepted a number of proposed changes and incorporated them into the updated **Draft DCO [EN010158/APP/3.1.8]** submitted at Deadline 5. The Applicant did not accept other proposed changes and set out a series of detailed justifications supporting its position. The Applicant refers to this document for its position on the changes proposed by the ExA.

3.3. Protective Provisions

- 3.3.1. The Applicant refers to the **Status of Negotiations with Statutory Undertakers [EN010158/APP/8.9.5]** which sets out the status of the various negotiations with statutory undertakers in relation to protective provisions and related commercial agreements. The Applicant has set out a summary of the status of each negotiation below as at Deadline 6.
- 3.3.2. The Applicant is confident that the SoS will be able to be satisfied that any extinguishment of right or removal of apparatus is necessary for the Proposed Development and is done so with adequate protections in place for the relevant statutory undertaker. Please refer to the **Status of Negotiations with Statutory Undertakers [EN010158/APP/8.9.5]** for more details on this position and for a more detailed account of the negotiations.
- 3.3.3. The Applicant confirmed with three parties that they did not require bespoke protective provisions in the **Draft DCO [EN010158/APP/3.1.9]**:
- the Environment Agency was satisfied that there is no need for Flood Risk Activity Permits for the Proposed Development (see **Appendix 2 to Deadline 1 Cover Letter [REP1-001]**) and the Applicant subsequently amended Article 6(1) (Disapplication and modification of statutory provisions) of the **Draft DCO [EN010158/APP/3.1.2] [AS-010]** to remove relevant references to the Water Resources Act 1991 and the Environmental Permitting (England and Wales) Regulations 2016 respectively;
 - GIGACLEAR Limited confirmed that does not require bespoke protective provisions and can rely on the standard protective provisions for the operators of electronic communications code in Part 2 of Schedule 15 of the **Draft DCO [EN010158/APP/3.1.2] [AS-010]**;
 - Scottish and Southern Energy Power Distribution Limited confirmed that does not require bespoke protective provisions and can rely on the standard protective provisions for electricity, gas, water and sewerage

undertakers in Part 1 of Schedule 15 of the **Draft DCO** [EN010158/APP/3.1.2] [\[AS-010\]](#).

- 3.3.4. The Applicant has agreed bespoke protective provisions with three parties and inserted those agreed protective provisions into the **Draft DCO** [EN010158/APP/3.1.9]. These include:
- protective provisions for the protection of Buckingham and River Ouzel Internal Drainage Board at Schedule 15, Part 4;
 - protective provisions for the protection of Anglian Water Services Limited at Schedule 15, Part 5; and
 - protective provisions for the protection of Thames Water Utilities Limited at Schedule 15, Part 6.
- 3.3.5. The Applicant has negotiated and agreed commercial agreements in respect of the Proposed Development with two parties:
- the Applicant and Vodafone Limited agreed and completed a commercial agreement in December 2025; and
 - the Applicant and National Grid Electricity Distribution (East Midlands) Plc have agreed and signed a commercial agreement (with agreed protective provisions) which will be dated and executed shortly after Deadline 6.
- 3.3.6. Negotiations have progressed positively but remain ongoing with four parties:
- bespoke protective provisions for the protection of National Grid Electricity Transmission Plc (NGET) are in agreed form and NGET and the Applicant are currently negotiating a related commercial agreement. The Applicant is confident that all remaining issues can be resolved and that the commercial agreement will be agreed before the end of Examination or shortly thereafter. The Applicant will update the relevant authority and submit the bespoke protective provisions into Examination or to the SoS directly when the related commercial agreement is agreed and completed;
 - the Applicant is currently negotiating an appropriate form of protection (either bespoke protective provisions or other form of commercial agreement) with Openreach Limited (who is the entity managing the protection of British Telecommunications PLC's assets in the Order Limits). The parties are close to agreement and the Applicant is confident that the parties can reach a mutually acceptable position before the end of Examination or shortly thereafter. The Applicant will provide an update to the ExA or the SoS (as relevant);
 - the Applicant is negotiating an interface agreement with Statkraft UK Ltd (in place of protective provisions) in respect potential interactions

between the Proposed Development and the East Claydon Greener Grid Park project. The Applicant is confident that all remaining issues can be resolved and that the interface agreement will be agreed before the end of Examination or shortly thereafter. The Applicant will provide an update to the ExA or the SoS (as relevant);

- the Applicant understands that that UK Power Networks Limited (UKPN) is not seeking bespoke protective provisions and is the Applicant is currently negotiating a commercial agreement with UKPN in respect of the Proposed Development which is very close to agreement. The Applicant considers that, because of the small number of remaining issues, it is possible that the commercial agreement will be agreed before the end of Examination. The Applicant will provide an update to the ExA or the SoS (as relevant).

4. Compulsory Acquisition (CA) Case

4.1. Powers sought and compliance with CA statutory and policy tests

4.1.1. The Applicant is seeking powers in the **Draft DCO [EN010158/APP/3.1.9]** to:

(a) acquire land compulsorily;

(b) create new and acquire new rights over land and impose restrictive covenants; and

(c) take some land temporarily to construct the Proposed Development.

4.1.2. The **Statement of Reasons [EN010158/APP/4.1.4] [REP5-010]** sets out how the Applicant has complied with the relevant statutory tests and also met the requirements of the DCLG Compulsory Acquisition Guidance (September 2013) ('CA Guidance') in respect of its compulsory acquisition case.

4.1.3. Under section 122 of the Planning Act 2008, compulsory acquisition powers may only be granted if the SoS is satisfied that the land is required for the Proposed Development (or is required to facilitate it or is incidental to it), and if there is a compelling case in the public interest for inclusion of the powers. In doing so, the SoS must be persuaded that the public benefits from the compulsory acquisitions will outweigh the private loss suffered by those whose land is to be acquired. The **Statement of Reasons [EN010158/APP/4.1.4] [REP5-010]** sets out how the Applicant has complied with section 122 in respect of all the land in which the Applicant seeks powers of acquisition and temporary possession over. Specifically, sections 5.3 and 5.5 of the **Statement of Reasons [EN010158/APP/4.1.4] [REP5-010]** address how the limbs of the conditions in section 122 have been met.

4.1.4. The CA Guidance requires an applicant to demonstrate to the satisfaction of the SoS that all reasonable alternatives to compulsory acquisition (including modifications to the development) have been explored. The Applicant submits that it has considered all reasonable alternatives by demonstrating that the proposed interference with the rights of those with an interest in land is for a legitimate purpose that is necessary and proportionate, including through its systematic process to determine a suitable site at first instance (see **Site Selection Report** which has been prepared and forms Appendix 1 of the **Planning Statement [EN010158/APP/5.7.6]**), through alternative layouts and configurations (see **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**) and through design evolution which has been informed by consultation (see **Consultation Report**

[EN010158/APP/5.1] [APP-020]). The **Statement of Reasons [EN010158/APP/4.1.4] [REP5-010]** at Section 5.6 sets out the alternatives to CA that the Applicant has considered by reference to other application documents and concludes that none of the alternatives or modifications considered for the Proposed Development would obviate the need for powers of compulsory acquisition powers and temporary possession over the Order Land. The Applicant has sought to minimise compulsory acquisition as far as possible and has sought, and continues to seek, the necessary land rights for the Proposed Development through voluntary agreements with landowners. The **Land and Rights Negotiations Tracker [EN010158/APP/8.8.5]** sets out the status of these negotiations with each affected person identified in the **Book of Reference [EN010158/APP/4.3.5]**.

- 4.1.5. The Applicant confirms that the majority of the Site for the Proposed Development is under option with a single landowner, meaning voluntary agreement has been reached. As explained in Sections 5.8 and 5.9 of the **Statement of Reasons [EN010158/APP/4.1.4] [REP5-010]**, whilst the Applicant is seeking to agree the terms for all land and rights required, it remains necessary for the Applicant to seek compulsory acquisition powers over all of the Order Limits (which is the typical ‘backstop’ for NSIPs). This is necessary to secure the required land, rights and interests and to ensure that any third-party interests or encumbrances affecting such land, rights and interests may be acquired, overridden or extinguished pursuant to the draft DCO, and to provide for any circumstance where voluntary agreements are not adhered to. This approach ensures that the Proposed Development can be constructed, operated and maintained without impediment, noting that it is in the public interest for the Applicant to be able to do so.

4.2. CA principles applied to PFL

- 4.2.1. A reoccurring question raised throughout the Examination has been whether the SoS can be satisfied that there is a compelling case in the public interest for the inclusion of powers of CA in the **Draft DCO [EN010158/APP/3.1.9]** in circumstances where PFL/TCS’ business supplies blood agar plates to the National Health Service (NHS). In response, the Applicant submits that it has satisfied the CA tests in respect of all land within the Order Limits which includes in respect of the plots in which PFL holds an interest.
- 4.2.2. As set out above, the SoS must be satisfied that there is a compelling case in the public interest for the inclusion of powers of compulsory acquisition in the DCO, and in doing so, must be persuaded that the *public benefits* from the compulsory acquisitions will *outweigh the private loss* suffered by those whose land is to be acquired (emphasis added).

- 4.2.3. Significant public benefits are established if consent for the Proposed Development is granted, but these can only be realised if compulsory acquisition powers are granted. The Proposed Development is a NSIP and qualifies as CNP infrastructure because it meets the urgent need for low carbon generation as established by the suite of NPSs relevant for energy (EN-1, EN-3 and EN-5 (2023)). By delivering the Proposed Development and as described in the **Statement of Need [EN010158/APP/5.6] [APP-036]**, the Applicant is contributing to meeting this urgent need for decarbonisation. The Applicant maintains that there is no quantifiable evidence before the Examination which demonstrates that the medical supplies of the NHS would be impacted as a result of the Proposed Development, and therefore any public disbenefit suffered.
- 4.2.4. The Applicant has sought to at first instance, avoid PFL livestock and PFL/TCS operations entirely, and where avoidance is not possible the Applicant has secured a package of bespoke mitigation. This is detailed at Appendix 1 to **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]** entitled 'Approach to Minimising Private Loss' and in response to each of PFL/TCS' issues set out in the **Applicant's Response to Preston Farms and TCS Biosciences Ltd's Deadline 5 Submission [EN010158/APP/8.43]**.
- 4.2.5. In reference to the public benefits brought about by the Proposed Development, the Applicant refers to its **Statement of Reasons [EN010158/APP/4.1.4] [REP5-010]** for submissions on how the Proposed Development satisfies all relevant government policy and supports the urgent need for CNP infrastructure. The **Planning Statement [EN010158/APP/5.7.6]** presents the planning balance, concluding that *"the limited adverse impacts of the Proposed Development in isolation after mitigation (which are limited to biodiversity, heritage and landscape and visual effects) and adverse inter-project impacts remaining after mitigation (which are limited to biodiversity and landscape and visual effects) are not considered to outweigh the Proposed Development's demonstrable and substantial benefits."*
- 4.3. **Position in respect of Field E23**
- 4.3.1. The Applicant is seeking to compulsorily acquire Field E23 for the purposes of installing Solar PV development. Field E23 is within the Applicant's Option Area that it has agreed with the Estate. The Applicant refers to Section 2 of the **Applicant's Response to Preston Farms and TCS Biosciences Ltd's Deadline 5 Submission [EN010158/APP/8.43]** for its submissions on the land position and consequences for Field E23.
- 4.3.2. In the context of the Notice to Quit which the landowner has issued on PFL in respect of the Farm Business Tenancy (FBT) land, the Applicant

has detailed the two possible future scenarios in respect of this plot which will arise post-Examination close on 1 October 2026.

- 4.3.3. Regardless of which scenario arises, the Applicant will be seeking compulsory acquisition powers over all of the Order Land as set out in the **Statement of Reasons [EN010158/APP/4.1.4] [REP5-010]** and noted above.

5. Overall Planning Balance

5.1. Need for the Proposed Development and National Policy Context

- 5.1.1. As aforementioned, unprecedented actions are required on a global scale to halt further Climate Change. A rapid increase in the supply of low carbon electricity is urgently needed for the UK to meet its legally binding Climate Change targets. Solar generation is a critical part of the UK's strategy to achieve Net Zero by 2050 and forms a key step towards meeting the Government's national mission for 'Clean Power by 2030'. This is further explained within Section 3 of the **Statement of Need [EN010158/APP/5.6] [APP-036]**.
- 5.1.2. The NPSs for energy (specifically NPS EN-1 and NPS EN-3 (2023)) confirm that large-scale ground-mounted solar farms have a critical role to play in achieving the Government's aims. Paragraphs 3.2.6 and 3.2.7 of NPS EN-1 (2023) establish that substantial weight should be given to the need of infrastructure covered by the NPS where paragraphs 3.3.20 to 3.3.24 of NPS EN-1 (2023) recognise that solar is a covered infrastructure-type.
- 5.1.3. Further to the substantial weight that is to be applied to covered infrastructure-types within NPS EN-1 (2023) is the fact that, across paragraphs 3.3.62 and 3.3.63 of NPS EN-1 (2023), there is an established 'critical national priority' (CNP) which is to be afforded to low-carbon infrastructure. The definition of low-carbon infrastructure extends to large-scale solar farms, such as the Proposed Development (see paragraph 4.2.5 of NPS EN-1 (2023)), because of the decarbonisation, energy security and affordability benefits that they deliver.
- 5.1.4. In addition to the recognised need to deploy CNP infrastructure, NPS EN-1 (2023) also recognises, through paragraph 4.2.2, that the UK's energy security and Net Zero ambitions will *"only be delivered if we can enable the development of new low carbon sources of energy at speed and scale"*.
- 5.1.5. What is important to recognise is how Government policy has become increasingly clear, particularly over this Parliament, that mitigating the effects of climate change and ensuring the UK's energy security, resilience and affordability is a top priority, including through affording relevant low carbon infrastructure a Critical National Priority (CNP) status. Key updates can be summarised as follows:
- Since the submission of the DCO Application for the Proposed Development in September 2025, the Government's support for low carbon infrastructure has gone further with the designation of revised NPS EN-1, NPS EN-3 and NPS EN-5 on 6 January 2026. The revised

NPSs have, importantly, embedded Clean Power 2030 (CP2030) policy into the NPSs and have also strengthened the overall policy case for CNP infrastructure; and

- Solar has been identified as being at the heart of the Government's CP2030 mission. CP2030 outlines the Government's steps to achieving this target and also outlines a strong Government ambition for 45 - 47GW of installed solar power by 2030. Beyond 2030, CP2030 recognises that solar generation will continue to be necessary to make an important contribution to the UK's renewable energy generating capacity towards 2050.

5.2. Benefits of the Proposed Development

- 5.2.1. The Proposed Development would make a significant contribution to the UK's meeting of policy commitments and legal decarbonisation targets. As a result, the overarching needs case for the Proposed Development, which constitutes CNP, should be afforded **substantial positive weight** in accordance with paragraphs 3.2.6 – 3.2.8 of NPS EN-1 (2023) (see paragraph 4.2.6 of NPS EN-1 (2023)).
- 5.2.2. In addition to the generation of a significant quantity of low carbon energy (which will make a meaningful contribution to the UK's legally binding Net Zero commitment and is a source of domestic energy security that limits UK consumers exposure to volatile energy prices), the Proposed Development will also deliver:
- Proposed permanent enhancements to connectivity within the local area through the rationalising and enhancement of the network of PRowS;
 - The creation of three permissive paths and one bridleway link;
 - Significant planting gains of approximately 8.78ha of structural tree planting and approximately 4,336 linear meters of structural hedgerow planting;
 - A total of 99.6ha (which is an uplift from previous references to 88.8ha with the removal of Solar PV development from Fields B6 and B8) of whole Fields which have been set aside as proposed areas for mitigation and/or enhancement;
 - A variety of biodiversity benefits including: new habitat for invertebrates, reptiles, amphibians, small mammals and birds; the sowing of grassland open fields; scrub and margins with wildflower; the establishment of ecological ponds (either former ponds for recreation or new ponds as blue infrastructure works) and wider vegetated cover for foraging and dispersal, to maintain bat flight lines across the landscape, and provide a winter seed source for birds;

- A BNG that is significantly in excess of 10% and equates to a secured net gain of 40% for habitats area units, a net gain of 17% for hedgerow units, and a net gain of 10% for watercourse units;
- An estimated net addition of 420 to 470 full time equivalent construction jobs within the CLMA per year of the Proposed Development's construction;
- An estimated net addition of 18 full time equivalent operational jobs supported by the Proposed Development's operational (including maintenance) phase;
- Interpretation boards for Claydon House and Claydon Registered Park and Garden on the proposed permissive path to Knowl Hill to better reveal the significance of the assets and improve appreciation and understanding of them; and
- The provision of an **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14.3] [REP2-077]** which, among other things, provides a commitment to an Education and Skills Fund to increase opportunities in the renewable and sustainable development sector.

5.2.3. Further to the above benefits, the ES has also concluded a number of beneficial effects (in isolation). These can be summarised as follows:

- In **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.7]**
 - For 'Ground nesting birds', there is a significant beneficial effect at the local level across the operational (including maintenance) phase of the Proposed Development.
- In **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]**
 - For 'GHG emissions', there is a significant beneficial effect across all phases of the Proposed Development.
- In **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.5]**
 - For 'Landscape fabric (woodland, trees and hedgerows)', there is a moderate beneficial effect at Year 10 of the Proposed Development's operational (including maintenance) phase.

5.2.4. The combined nature of these other benefits (beyond that of need) are considered to also attract **substantial positive weight** in favour of the Proposed Development.

5.3. Planning Balance

5.3.1. As recognised within the **Planning Statement [EN010158/APP/5.7.6]**, the Applicant set out with the objective to deliver a significant quantity of renewable energy, of NSIP scale, to the National Grid and contribute to

the UK's wider decarbonisation of energy supply. From the careful selection of a suitable site which benefited from favourable topography, irradiance, connection and proximity to the National Grid through to the detailed design measures, the Applicant has developed a proposal which is appropriate to its local context.

- 5.3.2. Paragraph 4.1.3 of NPS EN-1 (2023) notes that, given the urgency for the type of infrastructure covered in the Energy NPSs, the SoS will start with a presumption in favour of granting consent to applications for energy NSIPs. This presumption is further supported by the fact that the residual effects in the Proposed Development's case are limited to biodiversity, cultural heritage and landscape and visual effects.
- 5.3.3. It is considered that the residual effects do not engage the "*exceptional circumstances*" test that is outlined in paragraph 4.2.15 of NPS EN-1 (2023), and so the CNP policy applies in full. Resultingly, the SoS in decision taking ought to be led by the presumption that the needs case for the Proposed Development will, in general, "*outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy*" (see paragraph 3.3.63 of NPS EN-1 (2023)).
- 5.3.4. The Applicant is confident that the mitigation hierarchy has been appropriately applied, as demonstrated within the **ES [EN010158/APP/6.1 - 6.4]** and Section 9 of the **Planning Statement [EN010158/APP/5.7.6]**. Therefore, the determination of the Proposed Development is founded on the strongest decision making policy in favour of consent within the Energy NPSs.

5.4. Concluding Remarks

- 5.4.1. The **Planning Statement [EN010158/APP/5.7.6]** sets out the key points for consideration by the SoS with regard for the matters within the relevant NPSs; as directed under Section 104 (2)(a) of the Planning Act 2008 (PA2008). Through paragraph 7.2.11 of the **Planning Statement [EN010158/APP/5.7.6]**, the Applicant also details the other 'important and relevant' planning policy documents that have been considered within the **Planning Statement [EN010158/APP/5.7.6]** and that should be considered relevant to the SoS' decision; as directed under Section 104 (2)(d) of the PA2008. Meanwhile, the **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085]** provides response to Buckinghamshire Council's Local Impact Report **[REP1-112]**, for which the SoS is to have regard for under Section 104 (2)(b) of the PA2008. The **Applicant's Response to Deadline 2 Submissions [EN010158/APP/8.18] [REP3-051]** also contains response to Buckinghamshire Council's Local Impact Report Addendum **[REP2-092]**.

- 5.4.2. Section 104(7) of the Planning Act 2008 applies if the SoS is satisfied that, when deciding an application, the adverse impact of a proposed development would outweigh its benefits. Section 9 and Appendices 1, 2, 4 and 5 of the **Planning Statement [EN010158/APP/5.7.6]** and Sections 4.2 and 4.3 of this Closing Statement outline how the Proposed Development complies with NPS EN-1 (2023 and 2025), NPS EN-3 (2023 and 2025), NPS EN-5 (2023 and 2025) and the NPPF, as well as those other important and relevant local planning policy considerations.
- 5.4.3. In summary and as evidenced throughout the Examination and this Closing Statement, the needs case for the Proposed Development attracts substantial positive weight (see paragraphs 3.2.6 and 3.2.7 of NPS EN-1 (2023)). Beyond this needs case is the establishment of the Proposed Development qualifying as CNP infrastructure where such infrastructure is subject to a greater and established urgent needs case under which a presumption in favour of granting development consent is engaged. Notwithstanding, the SoS must have regard to the relevant NPSs (being NPS EN-1 (2023), NPS EN-3 (2023) and NPS EN-5 (2023)) when deciding the DCO Application; except to the extent that one or more of subsections (4) to (8) of Section 104 of the PA2008 apply. As is confirmed through Section 10 of the **Planning Statement [EN010158/APP/5.7.6]**, none of subsections (4) to (8) of Section 104 of the PA2008 apply.
- 5.4.4. Accordingly, the planning balance is firmly in favour of approval for what is an urgently needed, well-considered and successfully designed proposal that responds to its locality and is sensitive to the local environment.
- 5.4.5. The urgent needs case supporting the DCO Application's consent is furthered as Climate Change becomes statistically more significant where *"summer 2025 was the warmest UK summer on record"*¹. More recent evidence is highlighting the stresses that Climate Change is placing on the UK as Met Office reporting notes that July 2026 has been the driest on record for England, with just 10% of the long-term average (LTA) rainfall for the month².
- 5.4.6. Therefore, the increase in the amount of renewable energy generated by the Proposed Development will contribute to a position of better energy security for the UK, lower costs for consumers, assist in the halting further Climate Change and advance the resiliency of the electricity network

¹ UK Health Security Agency. "New UKHSA data shows 1,504 heat-related deaths during summer of 2025". Published 2 April 2026. Available online at: [New UKHSA data shows 1,504 heat-related deaths during summer of 2025 - GOV.UK](#) (accessed 07/08/2026).

² Environment Agency. "Dry weather and drought in England: 31 July to 6 August 2026". Updated 7 August 2026. Available online at: [Dry weather and drought in England: 31 July to 6 August 2026 - GOV.UK](#). (accessed 07/08/2026).

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