Rosefield Solar Farm

Applicant's Response to Deadline 6 Submissions

EN010158/APP/8.46
Revision 01
Deadline 7
August 2026
Rosefield Energyfarm Limited

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

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1. Introduction

1.1. Purpose of the Report

1.1.1. This document provides, as appropriate, the Applicant's responses to the submissions received at Deadline 6 in respect of the Proposed Development.

1.1.2. This document does not look to replicate the positions previously iterated by the Applicant, and so the Applicant instead signposts towards the following documents, where relevant:

- **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006];**
- **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085];**
- **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086];**
- **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087];**
- **Applicant's Response to Deadline 3 Submissions [EN010158/APP/8.22] [REP4-081];**
- **Applicant's Response to Deadline 4 Submissions [EN010158/APP/8.32] [REP5-089];**
- **Applicant's Response to Deadline 5 Submissions [EN010158/APP/8.42] [REP6-070];**
- **Applicant's Response to PFL/TCS Deadline 5 Submission [EN010158/APP/8.43] [REP6-071];** and,
- **Closing Statement [EN010158/APP/8.44] [REP6-072]**.

1.1.3. Where topics have previously been raised at Issue Specific Hearing 1 (held on 20-21 May 2026) and Issue Specific Hearing 2 (held on 22 May 2026), summaries of oral submissions and the Applicant's responses to the Action Points can be found in:

- **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [REP3-049]**;
- **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 2 (ISH2) [EN010158/APP/8.17] [REP3-050];**
- **Applicant's Outstanding Responses to Actions from ISH1 and ISH2 [EN010158/APP/8.24] [REP4-083];**

- **Applicants Response to Action Point 45 from ISH1 [EN010158/APP/8.26.2] [REP5-085]**;
- **Applicant's Response to Action Point 39 from ISH1 [EN010158/APP/8.27] [REP4-085]**; and,
- **Applicant's Response to Action Point 12 from ISH1 [EN010158/APP/8.31] [REP4-089]**.

1.1.4. Where topics have been raised at Issue Specific Hearing 3 (held on 7-8 July 2026), summaries of oral submissions and the Applicant's responses to the Action Points can be found in:

- **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) [EN010158/APP/8.33] [REP5-090];**
- **Applicants Response to Action Point 18 from ISH3 [EN010158/APP/8.40] [REP5-097];** and,
- **Response to Action Point 22 and 23 from ISH3 [EN010158/APP/8.41] [REP5-098]**.

1.2. Structure and Approach

1.2.1. This document is structured as follows:

- **Section 2** reviews the submissions made by Interested Parties at Deadline 6 and whether the Applicant is responding to the submissions, or otherwise, and the reason(s) why in either case; and
- **Section 3** provides the Applicant's responses, if applicable, to the submissions made by Interested Parties at Deadline 6.

1.2.2. For the benefit of the Examining Authority (ExA), the Applicant has sought to summarise passages from Deadline 6 submissions where only new matters have been raised by Interested Parties. This exercise has also sought to group submissions by topic and uses the ExA's **Rule 13 Letter [PD-017]** (dated 16 June 2026) as a general guide.

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

2. Scope of this Report

2.1. Applicant’s Position on Providing Responses

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

Party and Examination Reference	Responded to in this Document?	Reason
Buckinghamshire Council [REP6-074]	Yes	The Applicant wishes to respond to points made in this submission.
Buckinghamshire Council [REP6-075]	No	The Applicant does not consider there to be any points made in these submissions that have not been responded to in previous submissions.
Buckinghamshire Council [REP6-076]	No	
Buckinghamshire Council [REP6-077]	No	
Buckinghamshire Council [REP6-078]	Yes	The Applicant wishes to respond to points made in these submissions.
East Claydon Parish Council [REP6-086]	Yes	
Greg Smith MP [REP6-098]	Yes	
Anglian Water Services [REP6-079]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Claydons Solar Action Group [REP6-080]	Yes	The Applicant wishes to respond to points made in this submission.
Claydons Solar Action Group [REP6-081]	No	

Claydons Solar Action Group [REP6-082]	No	The Applicant does not consider there to be any points made in these submissions that have not been responded to in previous submissions.
Claydons Solar Action Group [REP6-083]	No	
Claydons Solar Action Group [REP6-084]	Yes	The Applicant wishes to respond to points made in this submission.
Claydons Solar Action Group [REP6-085]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Hogshaw Farm & Wildlife Park [REP6-101]	Yes	The Applicant wishes to respond to points made in this submission.
National Grid Electricity Transmission Limited [REP6-087]	No	The Applicant does not consider there to be any points made in this submission that have not been responded to in previous submissions.
Statkraft UK Limited [REP6-110]	Yes	The Applicant wishes to respond to points made in these submissions.
Upper Ouse Water Management Board (formally Buckinghamshire & River Ouzel Internal Drainage Board) [REP6-089]	Yes	
Preston Farms Limited and TCS Biosciences Limited [REP6-108]	Yes	The Applicant has responded separately to points made in this submission in **Applicant's Response to PFL/TCS Deadline 6 Submission [EN010158/APP/8.47].**
Preston Farms Limited and TCS Biosciences Limited [AS-042]	Yes	
Natural England [REP6-088]	No	The Applicant does not consider there to be any points made in these submissions that have not been responded to in previous submissions.
Adrian Carne [REP6-090]	No	
Andrew Taylor [REP6-091]	No	
Christopher Clews [REP6-092]	No	

David Post [REP6-093]	No	
Dr Chris Jordan [REP6-094]	Yes	The Applicant wishes to respond to points made in this submission.
Esther Turnbull [REP6-095]	No	The Applicant does not consider there to be any points made in these submissions that have not been responded to in previous submissions.
Georgina Barber [REP6-096]	No	
Gillian Gibbon [REP6-097]	No	
Hilary Audus [REP6-099]	No	
Jane Richards [REP6-102]	No	
Jo and Nigel Davison [REP6-100]	No	
Julia Anne Taylor [REP6-103]	Yes	The Applicant wishes to respond to points made in this submission.
Kathryn Dare [REP6-104]	No	The Applicant does not consider there to be any points made in these submissions that have not been responded to in previous submissions.
Lesley Maureen Bartlett [REP6-105]	No	
Margaret Rose Hughes [REP6-106]	No	
Natasha Anne Blake [REP6-107]	No	
Sally Tyler [REP6-109]	No	
Susan Bourne [REP6-111]	No	
Tom Morrison [REP6-112]	No	

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3. Applicant's Responses

Table 3.1: Applicant's Response to Deadline 6 Submissions

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
		Need, Site Selection and Alternatives	
3.1	**Buckinghamshire Council [REP6-078], Page 24, Para. 101**	Comment noting that Buckinghamshire Council considers the cumulative effects of the Proposed Development to be unusually significant due to the concentration of existing, committed and proposed infrastructure affecting the same communities and landscapes. Comment noting that the cumulative effects have been understated and should attract substantial weight in the planning balance, weighing materially against the grant of development consent.	The Applicant disputes that Buckinghamshire is experiencing an unusual scenario with regard to the scale of infrastructure development affecting the area. National Policy Statement for Renewable Energy (NPS EN-3) recognises at paragraphs 2.10.25 and 2.10.26 that 'applicants may choose a site based on nearby available grid export capacity', and that 'Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure'. The Applicant points to Lincolnshire and Nottinghamshire (specifically Bassetlaw District Council and West Lindsey District Council's administrative areas) where multiple NSIP-scale projects have been consented and include, but are not limited to the: Cottam Solar Project, Tillbridge Solar Project, Gate Burton Energy Project, West Burton Solar Project. These examples of NSIP-scale projects do not extend to consideration of TCPA projects, which are also capable of contributing to cumulative effects. In assessment of these projects, the ExA and SoS concluded the following on cumulative effects: • For Tillbridge Solar Project, the Secretary of State Decision Letter concluded "*In-combination effects – little negative weight*"; • For West Burton Solar Project, the Secretary of State Decision Letter noted at paragraph 4.296 that *"Overall, the ExA was satisfied that the Applicant had undertaken an assessment of cumulative effects in accordance with the requirements of 2011 NPS EN-1 and 2024 NPS EN-1 and concluded it was a neutral matter in the overall balance [ER 3.14.71]."* The letter concludes at paragraph 4.304 that *"The Secretary of State will not ascribe a separate weighting for cumulative effects"*; and • For Cottam Solar Project, the ExA's Recommendation Report and Appendices notes at paragraph 5.2.79 that cumulative effects are a *"neutral matter in the overall balance".* In accordance with NPS EN-3 paragraph 2.10.26, and as previously stated in the **Applicant's Response to Deadline 3 Submissions [EN010158/APP/8.22] [REP4-081]** and the **Applicant's Response to Deadline 4 Submissions [EN010158/APP/8.32] [REP5-089]**, the approach adopted by the Applicant in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.4] [REP5-038]** is consistent with standard EIA practice and in line with the PINS Advice on Cumulative Effects, and reflects a proportionate assessment based on available information. This is also set out in the **Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.6] [REP6-027]**. The Applicant therefore refutes the suggestion that cumulative effects have been understated.

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			With the above in mind, the Applicant does not agree with Buckinghamshire Council's position that significant weight should be afforded to cumulative effects in the planning balance.
3.2	**Julia Anne Taylor [REP6-103], Para. 8**	Comment noting there has been reference made in public statements by EDF Energy UK's CEO regarding electricity curtailment and the need to increase demand for green electricity rather than continue expanding generation capacity. Comment noting that, on this basis, it is argued that the need for the Proposed Development has not been demonstrated.	The CEO of EDF Energy UK Simone Rossi's comments reported in *The Telegraph* were not intended to suggest that new solar projects such as the Proposed Development are unnecessary. Rather, his point was that investment in new renewable generation should be matched by growth in electricity demand through the electrification of transport, heating, industry and data centres. He has reaffirmed EDF's commitment to its UK renewable pipeline, stating that projects such as the Proposed Development would make an important contribution to the UK's future energy needs by providing clean, home-grown electricity, strengthening energy security, reducing carbon emissions and supporting local jobs and investment.
3.3	**Buckinghamshire Council [REP6-078], Page 5, Para. 19**	Comment noting that Buckinghamshire Council remain concerned that the bat monitoring strategy does not identify remedial actions for all objectives, particularly where monitoring indicates that habitat buffers are inadequate and connectivity has not been maintained. Comment noting that the strategy should explicitly state that enlarging habitat buffers is the primary remedial action where a clear and consistent decline in bat activity along buffered habitats is identified.	The **Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6.7] [REP6-060]** secures a commitment to remedial actions should monitoring show a requirement. As outlined in the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) [EN010158/APP/8.33] [REP5-090]**, this does not preclude any remedial actions being considered, but it is premature to suggest remedial mitigation measures at this stage. The **Outline LEMP [EN010158/APP/7.6.7] [REP6-060]** also secures a commitment to developing the detailed monitoring strategy in consultation with relevant stakeholders which includes Buckinghamshire Council and Natural England.
3.4	**Buckinghamshire Council [REP6-078], Page 6, Para. 23**	Comment noting that Buckinghamshire Council remains concerned that the proposed buffers are insufficient to protect ecological features and maintain connectivity, particularly where buffer distances have been measured from feature centrelines or parcel boundaries rather than the edge of the existing habitat. Comment noting that this approach reduces buffer effectiveness and, in some cases, results in ecological features being harmed by adjacent	As previously submitted, whilst measured from the centre-line of features (consistent with other consented solar installations), there are substantial buffers which have been enlarged in places of greater sensitivity to ensure effectiveness. In addition, there is a commitment to protect tree root protection areas and, always, a 5m additional gap between vegetation and the security fence to allow for maintenance. That gap means there would always be a space within which bats can fly along the edge of all such linear features. In relation to the specific features listed: • **Hedgerow east of Field B3**: the Applicant does not agree with the characterisation of the area as providing no remaining undeveloped buffer. The assertion that the existing trees within the hedgerow have a canopy extending approximately 17m in width is not supported by a specific tree reference or evidence within the comment. No individual tree within this hedgerow has a recorded canopy width of 17m within the **ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] [REP2-044]**. The 17m

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		infrastructure rather than protected from it. Examples are then given and include: • Hedgerow east of B3; • Ancient woodland buffer between Shrubs Wood and B11; • Hedgerow north of Shrubs Wood; • South of B16; and • Hedgerow north of Sheephouse Wood.	dimension appears to relate to the calculated Root Protection Area (RPA) of T306, rather than the physical canopy extent of the retained tree. Furthermore, the Applicant has committed to avoiding veteran tree buffers in the positioning of both Solar PV modules and fence lines as committed and detailed within the **Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2.6] [REP5-067]**. The proposed layout therefore does not rely on the canopy edge alone to define the extent of protection for sensitive trees. With respect to bats, this short length of hedgerow is the boundary between Fields B3 and B6. It is no longer proposed to include Solar PV modules in Field B6. The hedgerow cited as being of concern is therefore only the edge of a wide and continuous north-south grassland corridor. • **Shrubs Wood**: whilst there is a minimum 30m buffer proposed around ancient woodland (which the Applicant considers appropriate for this type of development); this has been extended to 50m to the west and south side of Shrubs Wood. There are no Solar PV modules to the west (Field B6) or north (Field B13A which is cable infrastructure only), so the need for extended buffers does not apply. • **South of Field B16**: the Applicant acknowledges the Council's concern regarding the relationship between the proposed fencing and the RPA of the retained trees south of Field B16. However, the presence of the fencing alignment within an RPA does not in itself indicate that the retained trees cannot be adequately protected or that their long-term health would be compromised. The Applicant has committed to avoiding veteran tree buffers in the positioning of both Solar PV modules and fence lines as detailed within the **Outline LEMP [EN010158/APP/7.6.7] [REP6-060]** and **Outline CEMP [EN010158/APP/7.2.6] [REP5-067]**The retained hedgerow and associated trees will therefore remain protected, with the detailed measures to be confirmed through the Arboricultural Method Statement. With respect to bats, Field B17 is located to the south of Field B16. There are no Solar PV modules proposed in Field B17 which is reserved for grassland mitigation. • **Hedgerow north of Sheephouse Wood**: The wider elements of the hedgerow running north from Sheephouse Wood are within a length that is adjacent to Field B8 where there are no Solar PV modules. Further north, there are bespoke buffers proposed from the hedgerow and the development in Fields B7 and B10 (15m either side of the hedgerow centre line). • Considering the above examples, and the justification for buffers set out in responses in **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**, **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085]**, **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]** and **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]**, , the Applicant therefore believes that the functionality of these (and other) hedgerows will be preserved.

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3.5	**Buckinghamshire Council [REP6-078], Page 7, Para. 27**	Comment noting that Buckinghamshire Council does not dispute the potential ecological benefits of enhanced grassland but remains concerned that the success of the compensation strategy is uncertain and dependent on robust long-term management, monitoring, adaptive mitigation and enforceable intervention measures. Comment noting that further detail should be secured through the oLEMP, as uncertainty remains regarding the long-term effects of the Scheme on Skylark, Lapwing and Golden Plover.	The **Outline LEMP [EN010158/APP/7.6.7] [REP6-060]** clearly outlines appropriate mitigation and states a commitment to long-term monitoring of habitat management which would inform appropriate remedial measures if required. The Applicant has submitted a proportionate mitigation scheme with regards to the potential effects that could occur to farmland birds including breeding skylark, and wintering lapwing and golden plover as detailed within the **Outline LEMP [EN010158/APP/7.6.7] [REP6-060]** and this document also secures appropriate monitoring of this mitigation. As set out within the **Position Paper on Ground Nesting Birds and Wintering Bird [EN010158/APP/8.36] [REP5-093]**, neither Lapwing or Golden Plover were recorded regularly on each winter visit indicating they are likely not dependent on the fields within the Order Limits. Peak counts of Lapwing recorded are low compared with numbers recorded at multiple sites across the county and adjacent counties, with numbers considerably in excess of what has been recorded within the Order Limits. Likewise, peak counts of Golden Plover recorded are low compared to some locations within the county, for example Gallows Bridge regularly recording in excess of 1000 individuals. Given that both Lapwing and Golden Plover are recorded from multiple locations across Buckinghamshire and adjacent counties in numbers considerably in excess of what has been recorded within the Order Limits, the Applicant's assessment of the effects of the Proposed Development on both Lapwing and Golden plover is accurate. This data demonstrates that even if all individual Lapwing and Golden Plover were displaced by the Proposed Development, it would not constitute a significant effect as there is a plethora of additional winter foraging habitat that they can and would use.
3.6	**Buckinghamshire Council [REP6-078], Page 8, Para. 30**	Comment noting that the removal of HS2 mitigation planting to accommodate the Proposed Development would reduce woodland extent, narrow the ancient woodland buffer to Decoypond Wood, and diminish the width of an important bat corridor, while also delaying woodland establishment previously intended to precede HS2 impacts. Comment noting that the resulting loss of established, albeit young, woodland has not been accounted for in the Proposed Development 's biodiversity net gain calculations and should be included in the assessment.	There would be no loss of High Speed 2 (HS2) mitigation planting as a result of the Proposed Development. This is confirmed within the **Statement of Common Ground with High Speed 2 Limited [EN010158/APP/5.19.2] [REP5-020]** which includes a confirmation from HS2 at Ref 4 that their mitigation planting does not overlap with the Proposed Development's Order Limits, and an explanation from the Applicant that an agreement reached between Claydon Estate and HS2 has switched out areas of mitigation planting previously proposed for within the Order Limits to other, replacement land not impacted by the Proposed Development. The Applicant confirms that none of the HS2 mitigation planting in this overlap area with the Order Limits had been planted before the switch was agreed, and as such no planting has been removed. Therefore, the Biodiversity Net Gain baseline is correct and does not need to account for HS2 mitigation planting as there is no HS2 mitigation planting within the Order Limits and no planting was present at the time the habitat baseline was collected.
3.7	**Buckinghamshire Council [REP6-074], Page 7, Para. 30**	Comment noting that the Applicant has undertaken initial discussions with NatureSpace and that a full assessment	The Applicant has previously provided details regarding the approach to be taken for great crested newt licensing, and has been in discussion with both NatureSpace and Natural England on this matter. NatureSpace have provided the Applicant with a preliminary report as evidence of

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		has not yet been completed due to the absence of sufficient information to determine the required compensation. Comment noting that clarity is needed regarding the Applicant's claim of an offer in principle from NatureSpace, and that this matter should be resolved before any decision on the Proposed Development is made.	an offer in principle, stating at page 17 that 'This Report is intended to confirm, in principle, a route through the [District Licensing] Scheme for Rosefield Solar Farm'. The Applicant has submitted this report at Deadline 7 as **Appendix 1** to this document.
3.8	**Claydons Solar Action Group [REP6-084], Page 3, Para. 4.2 and Footnote 2**	Comment noting that the ES is considered to mischaracterise the scientific evidence by downplaying the general trend of bat displacement and avoidance at solar farms, including incorrectly describing studies covering 19 and 190 sites as small-scale. Comment noting that the Applicant has provided no evidence for its assertion that displacement effects are associated with poorly managed solar farms, while measures intended to distinguish the Proposed Development, particularly secured grazing, remain an aspiration rather than a firm commitment.	The Applicant's position (contrary to CSAG's assertions) is that the available studies are largely short-term and the evidence limited; there are no longitudinal (i.e. before/after) studies of effects on bats from well-designed, well-managed, fully established solar farms; that is, solar farms managed for the benefit of biodiversity. In most cases, the studies cited (even if carried out over a large number of sites) relied on short (often very short) data collection periods, and also used paired solar farm/control sites, with the criteria for pairing unstated. The ExA is directed to a full review of the recent research which was submitted as *Review of Research Papers on the Impacts of Solar Development to Bats* in **Appendix 2** of **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]**. It is noted that a new paper (another small-scale study) is cited by both Natural England and CSAG[1] (Tavernier, 2026); this paper is not included in the Applicant's review. Its conclusions are that activity was lower on the solar farms they tested, but noting that such negative impacts of solar farms on bats could be reduced through targeted ecological enhancement (not an obvious feature of the solar farms under study). As is proposed for the Proposed Development, the paper recommends 'integrating features such as hedgerows, tree lines, and flower-rich grasslands [to] improve landscape connectivity and boost local insect abundance and diversity'. It also notes that 'solar field edges [had] strong potential to enhance habitat quality within intensive agricultural landscapes; for example, establishing tall, woody hedgerows'. The foraging (grassland) that will be available post-construction is mischaracterised by CSAG and the ExA is invited to review Appendix 2 of the **Outline LEMP [EN010158/APP/7.6.7] [REP6-060]**. The Applicant's strong intention to undertake grazing of that grassland is set within the main body of the **Outline LEMP [EN010158/APP/7.6.7] [REP6-060]** as per previous responses.
3.9	**Claydons Solar Action Group [REP6-084], Page 3, Para. 4.2 and Footnote 2**	Comment noting that the Applicant's assessment is founded on the assumption that habitat displacement effects from solar arrays are either	See Applicant's response to **Ref. 3.8** above.

[1] Tavernier, C., Nuijten, R., Buij, R. & van Langevelde, F. (2026) Solar fields in farmlands, their impact on bat presence and activity. PLOS ONE, 21(6), https://doi.org/10.1371/journal.pone.0335581. This paper was published in June, subsequent to the compilation of the applicant's review of research papers.

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		insignificant or adequately compensated by the creation of permanent grassland, without properly assessing the spatial extent of bat disturbance and displacement or the implications for those conclusions. Comment noting that uncertainty remains regarding the distance over which displacement effects may occur, as highlighted by Natural England, and that this undermines confidence in the Applicant's buffer approach, particularly where buffers are measured from the centreline of hedgerows rather than the habitat edge.	
		BESS	
3.10	**Claydons Solar Action Group [REP6-080], Pages 18 to 21**	Comments refuting responses given by the Applicant with regards to effects from BESS fires. Response sets out that, as evidence on impacts of BESS fires is minimal, there is a need for a precautionary approach. Responses refer to a report also submitted into examination as **Claydons Solar Action Group [REP6-081]**.	Section 3.4 of the **Applicant's Response to PFL/TCS Deadline 5 Submission [EN010158/APP/8.43] [REP6-071]** provides a comprehensive summary of the conservative assumptions of the submitted **BESS Plume Assessment Summary [EN010158/APP/7.13.3] [REP3-042]**. Section 3.4.2 confirms that*: Emission rates were derived from <u>peak concentrations measured during large</u>-<u>scale fire testing</u> and therefore represent peak fire conditions, rather than average behaviour, and these peak rates were then conservatively assumed to be sustained over an extended duration of up to eight hours for modelling purposes. This approach intentionally overestimates realistic fire behaviour, which would be characterised by a short peak followed by a decay phase, rather than sustained high-intensity emissions. The modelling also assumes worst-case meteorological conditions and BESS locations closest to receptors, further embedding precaution into the assessment.* Section 3.4.13 details the conditions for the commissioning of a final Plume Study: *At the detailed design stage post-consent, a final Plume Study will be commissioned using the selected BESS design fire emission data and infrastructure layouts to check that in the final design the exposure limits within the surrounding fields, are no worse than those included within the current Plume Modelling Outputs, this is secured within Section 5.2.10 of the **Outline BSMP [REP4-074]**.* The Applicant supplied additional details of the requirements for the final Plume Study through oral submissions at ISH 1, as set out in **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [REP3-049]**, namely: • The Applicant confirms that BESS Fire Emissions Modelling of the selected BESS system commissioned at the detailed design stage will be conducted at approved third-party or

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			government approved test laboratories. These facilities utilise large scale smoke hoods (cone calorimeters) capable of capturing every type of battery gas & particle emitted during the thermal runaway process at battery module, battery rack or complete BESS enclosure level. • This equipment can measure total volume gas production (gas chromatography) and FTIR (Fourier Transform Infrared Spectroscopy) testing (PPM) for organic compounds (toxic gases) such as: Carbon Monoxide (CO), Carbon Dioxide (CO2), Hydrogen (H2), Sulphur Dioxide (SO2), Nitrogen Oxides (NOx), Hydrogen Fluoride (HF), Hydrogen Cyanide (HCN), Hydrogen Chloride (HCl), Hydrocarbon gases (THC content), PAHs, etc. • The equipment also integrates comprehensive particle capture by XRF (X-ray fluorescence) analysis checks for: Phosphorus, Aluminium, Nickel, Silicon, Calcium, etc. This means that heavy metal particulate emissions and Particulate Matter can be quantified and included in emission modelling if the selected battery system emits significant levels during fire testing. • This final Plume Analysis Study undertaken at the detailed design stage will be based on BESS-specific fire testing data for the selected system. This will allow refinement of emissions characterisation (including particulates and trace compounds where measurable) and ensure that the Emergency Response Plan is informed by the most up-to-date and representative data available. Therefore, the Applicant has already followed best practice advice for BESS fire emission modelling contained in the National Fire Protection Association (NFPA) report submitted by Claydons Solar Action Group '**Environmental Impact of Lithium-Ion Battery Incidents Compared to Other Common Incidents' [REP6-081].** The Applicant also emphasises that the conclusion section of the NFPA report states that Lithium-ion Battery (LIB) fires are not dissimilar to fires involving other fuel sources: • *Carbon oxide emissions from LIB fires are comparable to those from classic fires* • *Hydrogen fluoride is a potential marker of LIB fire emissions, though HF is highly reactive and may not always be easy to detect and measure* • *The total emission of particle matter from LIB fires is lower than those from fires with high smoke production, such as hydrocarbon fires, but the particle chemical structure differs, as LIB fires contain a large amount of metals* • *VOC emissions from LIB fires are similar to those from classic fuel fires* • *PAH emissions from LIB fires seem lower than those observed for other fuels* The Applicant has already demonstrated that BESS toxic fire emissions dissipate very rapidly and has committed to commissioning a final Plume Assessment Study defining specific metal particulates and gas emissions for the selected BESS design to demonstrate that gas emissions and particulate emissions (soil and water pollutant risks) are fully defined and will not significantly impact sensitive receptor locations.
3.11	**Buckinghamshire Council [REP6-074], Pages 3 & 4, Paras. 11 & 12**	Comment noting that Buckinghamshire Council remains concerned that the Applicant has applied the Pager Power	The Applicant has addressed this point in their response to Action Point 22 from ISH3 (**Applicants Response to Action Point 22 and 23 from ISH3 [EN010158/APP/8.41] [REP5-098]**), where it provided a further assessment of local roads assuming that they were Major

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
		guidance in a blanket manner, assuming impacts on roads are always low despite the potential for reflections on local roads and the importance of those routes within the wider highway network. Comment noting that this approach may underestimate potentially significant glint and glare effects and associated road safety risks, resulting in the omission of necessary mitigation measures.	National, National or Regional roads (i.e. assuming they had the potential to receive Moderate or High impacts as set out in the Pager Power guidance). The Applicant stands by it's categorisation of the roads considered as being 'local roads' and has applied the terminology for impact classification and requirement for mitigation as set out by the Pager Power guidance. The Applicant considers this to be a consistent application of the guidance rather than a blanket manner. It is unclear why the Council believe these roads should be categorised other than as local roads. The Council suggests that these roads have an importance within the wider highways network, but they do not explain what this importance is and the Applicant therefore finds it difficult to differentiate between what the Council feels is a local road and what they feel is a more important road within the highway network.
3.12	**Buckinghamshire Council [REP6-074], Pages 4 & 5, Para. 15**	Comment noting that Buckinghamshire Council considers a precautionary approach to glint and glare effects on road users to be appropriate, given their potential to create significant road safety hazards. Comment noting that DCO Application's outline management plans should retain flexibility to implement mitigation where sensitivity testing identifies potential effects: including hedgerow management (e.g., One Earth Solar DCO), fixed panel orientations (e.g., Lime Down Solar Park) and the use of smaller panel sizes in specific locations (e.g., Lime Down Solar Park).	As above, the Applicant has addressed the potential for Moderate or High impacts to local roads (addressing the Council's request for a precautionary assessment), and the requirement for mitigation, within its response to Action Point 22 from ISH3 (**Applicants Response to Action Point 22 and 23 from ISH3 [EN010158/APP/8.41] [REP5-098]**). The glint and glare assessments submitted with the One Earth Solar Farm and Lime Down Solar Farm applications have used the same methodology and drawn the conclusions as the assessment submitted with this Development Consent Order (DCO) Application. Both of these assessments have similarly concluded that effects to local roads are of low impact and no further, more detailed, assessment of impacts is required or included. Mitigation measures have only been suggested or included where impacts were identified to Major National, National or Regional roads and classed as Moderate or High impacts.
3.13	**Hogshaw Farm & Wildlife Park [REP6-101], Page 5 (Noise, tranquillity and visitor experience)**	Comment noting that acoustic evidence submitted on behalf of Hogshaw Farm & Wildlife Park (HFWP) identified genuinely quiet areas within the attraction, demonstrating that parts of the site are highly sensitive to noise and that the Applicant's comparisons with noisier locations such as play areas and car parks do not address this concern. Comment noting that, if consent is granted, operational noise monitoring should include representative quiet	It is not considered that the predicted operation (including maintenance) noise levels associated with the Proposed Development are sufficient to result in significant adverse effects at Hogshaw Farm & Wildlife Park. The predicted specific noise levels during the operation (including maintenance) phase of the Proposed Development at Hogshaw Farm & Wildlife Park are very low at approximately 30dB(A), which is lower than the ambient sound levels measured by Sharps Acoustics in their targeted 'quiet' monitoring locations **[REP1-129]**. The monitoring locations are consistent with the 'genuinely quiet' areas that Hogshaw Farm & Wildlife Park are referring to. Furthermore, the noise prediction model assumes downwind propagation from each item of noise-emitting equipment towards the receptor, regardless of their respective positions within the Order Limits; this represents a precautionary approach in terms of noise predictions at receptors within the study area.

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
		areas within HFWP and provide a clear mechanism for investigating and mitigating any material impacts on those areas.	It is noted within the Deadline 1 Hogshaw Farm & Wildlife Park representation **[REP1-129]** that the annual visitor numbers to Hogshaw Farm & Wildlife Park are anticipated to increase from over 70,000 to 150,000 over the next five years, which would be expected to have a detrimental effect on the potential tranquility of the site. The operation (including maintenance) phase noise monitoring procedure and also the complaint procedure are set out in Section 2.8 of the **Outline Operational Environmental Management Plan [EN010158/APP/7.3.7]**.
		Traffic	
3.14	**Hogshaw Farm & Wildlife Park [REP6-101], Page 3 (Business viability and employment)**	Comment noting that the key issue for HFWP is whether visitors will continue to be able and willing to access the site, given that access disruption has a direct effect on the business. Comment noting that previous road closures and diversions have resulted in complaints, refund requests, occasions where staff and customers were unable to reach the site, and reductions in visitor numbers.	The level of construction traffic on Claydon Road is detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4.4]**. The level of construction traffic is equivalent to 7 inbound HGV per hour during the operational times for HFWP as noted on their website (https://hogshawfarm.co.uk/times-prices/). This level of traffic, equating to one inbound HGV every 8 minutes, is not considered to constitute any meaningful impact on the accessibility of HFWP as a tourist destination and certainly not on Sundays when no construction works or deliveries are planned. As noted in previous questions in both hearing sessions and in responses to submissions, no road closures or diversions are proposed of the scale experienced for HS2. The only road closure that could occur would be Snake Lane / Fidlers Field, which requires reconstruction with or without the approval of the Proposed Development. This road however may be reconstructed by others prior to works commencing on the Proposed Development. It is noted that on the HFWP website that directions to the farm include a link to check for road works (https://hogshawfarm.co.uk/contact-us/) and as such, it is not clear how staff and customers cannot navigate to the site. A compliant assessment of business viability undertaken within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.5] [REP6-044]** and further explained at **ES Volume 4, Appendix 14.2: Effects on Individual Agricultural and Non-Agricultural Business Receptors [EN010158/APP/6.4] [REP5-044]**. This assessment – in line with the requirements of the scope of assessment, and the accepted guidance - identifies the potential for environmental factors (including changes to access) to influence business viability, concluding that there is no evidence that access disruption would occur to the extent that it would deter visitors and affect the viability of HFWP.
3.15	**Hogshaw Farm & Wildlife Park [REP6-101], Page 3 (Business viability and employment)**	Comment noting that the latest oCTMP acknowledges the exceptionally poor condition of Snake Lane/Fiddlers Field and confirms that reconstruction works,	All versions of the **Outline Construction Traffic Management Plan (Outline CTMP) [EN010158/APP/7.5.5] [REP5-073]** presented to the ExA during the Examination have clearly acknowledged the existing state of Snake Lane / Fidlers Field. Reconstruction of Snake Lane / Fidlers Field is required, regardless of if the Proposed Development proceeds or not. The existing road surface has failed and requires replacement.

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
		potentially requiring a further temporary road closure, may be necessary. Comment noting that, while the Applicant has now recognised HFWP's access concerns, the qualified commitment to undertake such works outside the summer school holidays "where possible and subject to approval" does not provide sufficient certainty that those concerns will be adequately addressed.	This may be delivered by Buckinghamshire Council (as local highway authority) or by HS2 to offset damage caused by HS2 construction works and traffic. This may be prior to works commencing on the Proposed Development. The timings and permissions for road closures are a matter for Buckinghamshire Council as highway authority. The Applicant has expressed a desire to undertake the works outside of the summer period, and has committed to doing so where possible and subject to approval in the **Outline CTMP [EN010158/APP/7.5.5] [REP5-073]**. However the necessary approvals rest solely with the Council. As such, this is the strongest commitment that the Applicant is able to make in the circumstances.
			Soil
3.16	**East Claydon Parish Council [REP6-086], Page 5, Paras. 11.1 & 11.2**	Comment noting that the Parish Council remain concerned about the risk of long-term damage to the Site's predominantly clay soils, particularly during wet periods, and highlights evidence that recovery from such impacts can take decades. Comment noting that the former tenant farmer, who was experienced in managing these sensitive soils, would generally avoid working the land from late autumn until early spring (around five months of the year), and questioning whether the Applicant would be prepared to suspend works during that period to protect soil structure.	Soil stripping would be minimal and confined to areas of hard infrastructure such as the BESS and substation. Furthermore, the **Outline Soil Management Plan (Outline SMP) [EN010158/APP/7.7.4] [REP5-077]** states that during conditions or in areas where rutting is likely to occur, track matting and low ground pressure vehicles will be used wherever possible. Damage occurring from heavy plant will therefore be minimal. It is not viable for all work to be suspended during the period from late autumn until early spring however the soil will only be worked on when in a dry, friable condition below the plasticity limit. All soil handling operations would follow the procedures detailed in the **Outline SMP [EN010158/APP/7.7.4] [REP5-077]**, which specifies that soil stripping, storing and restoration operations will only occur when the soils are suitably dry. A suitably trained person would test the soil plasticity prior to construction operations to confirm suitability for handling, following a soil moisture test derived from the Institute of Quarrying's (2021) 'Good practice guide for handling soils in mineral workings'. This will ensure that soils are not handled when at an elevated risk of structural damage in order to protect soil structure. Natural England has agreed that the level of mitigation provided within the **Outline SMP [EN010158/APP/7.7.4] [REP5-077]** is appropriate to prevent any long-term damage to the soils, in particularly the heavier clay structures. This agreement is outlined in the **Statement of Common Ground with Natural England [EN010158/APP/5.14.3] [REP6-019].** Therefore, the Applicant is confident that, through following the measures set out in the outline soil management plan, the soils will not endure substantial damage and require decades to recover as suggested. Rather, any damage to soils will be minimal, temporary and reversible.
3.17	**Buckinghamshire Council [REP6-078], Page 18, Para. 72**	Comment noting that Buckinghamshire Council acknowledge the additional receptor-level assessments provided in Appendix 14.2 have significantly	The Applicant welcomes this comment.

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
		improved the transparency of the Population assessment and provide a clearer evidence base for conclusions relating to individual agricultural and non-agricultural businesses. Comment noting that Buckinghamshire Council therefore considers its principal concern regarding the lack of transparent receptor-specific assessment for these businesses to have been addressed.	
3.18	**Dr Chris Jordan [REP6-094], Page 4, Ref. 4.4.5**	Comment noting that concern remains over the Applicant's reliance on role-specific compliance with toolbox talks, given the implication that certain requirements may not apply universally across all personnel working on Site. Comment noting that any failure to comply with Home Office requirements could have significant consequences for the operations of PFL/TCS, with potential implications for the supply of diagnostic products to the NHS and associated public health outcomes.	The Applicant refutes the suggestion that the Applicant's statement that "staff would be aware of and comply with the contents of the toolbox talk insofar as the requirements relate to their particular role on-site" supports the conclusion that good working practices "only appl[y] to certain members of staff". The reference to role-specific inductions is entirely logical, and in line with construction industry best practice to ensure that the induction is relevant to the personnel that receive it. For example, a delivery driver would not need to learn about the mitigation measures required during piling activities. Notwithstanding this, keeping the inductions relevant to each role is necessary for ensuring compliance as no individual staff member can reasonably be expected to remember all measures to be implemented for activities that they will not participate in across the Site. That said, some measures would be Site-wide and universally applicable to all roles within the Proposed Development, and therefore be communicated to all staff on that basis. In relation to biosecurity, every staff member who requires access to the Biosecurity Area would undergo an induction and toolbox talk covering the induction syllabus at **Appendix D** of the **Outline Biosecurity Management Plan (Outline BMP) [EN010158/APP/8.39.2]**, including the requirements under the Home Office licence.
3.19	**Upper Ouse Water Management Board (formally Buckinghamshire & River Ouzel Internal Drainage Board) [REP6-089], Page 1**	Comment noting that the Buckinghamshire & River Ouzel Internal Drainage Board has been amalgamated with two other boards and is now known as the 'Upper Ouse Water Management Board' following the coming into force of the Upper Ouse Water Management Board Order 2026 on 1 April 2026. Comment noting that the dDCO should be amended accordingly so that all references in Schedule 15, Part 4 are updated to refer to the "Upper Ouse Water Management Board".	The Applicant has updated the **Draft DCO [EN010158/APP/3.1.10]** at Deadline 7 to refer to the Upper Ouse Water Management Board instead of the Buckinghamshire & River Ouzel Internal Drainage Board. The Applicant has confirmed through correspondence with the Upper Ouse Water Management Board dated 19 August 2026 (Appendix 1 of the Applicant's Deadline 7 Cover Letter) that the original consent to disapplication of legislation provided by Buckingham & River IDB (Appendix 2 to Applicant's **Deadline 1 Cover Letter [REP1-001]**) still applies following the amalgamation of the Board.

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
3.20	**Hogshaw Farm & Wildlife Park [REP6-101], Pages 1 & 2 (Assessment of Hogshaw Farm & Wildlife Park)**	Comment noting that, despite identifying HFWP as a high-sensitivity receptor with limited capacity to absorb environmental and access changes, the Applicant maintains that effects on the business and its viability will be limited without providing a robust business-specific assessment to support that conclusion. Comment noting that insufficient consideration has been given to the potential effects on visitor behaviour, visitor numbers, school visits, future investment and employment, particularly given that the countryside setting is a core component of HFWP's attraction and business model.	In accordance with the assessment of business viability undertaken within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.5] [REP6-044]** and further explained at **ES Volume 4, Appendix 14.2: Effects on Individual Agricultural and Non-Agricultural Business Receptors [EN010158/APP/6.4] [REP5-044]** at Deadline 5, there is no evidence of the potential for changes to environmental factors including changes to access to compromise the overall business viability of HFWP. The Applicant recognises the attractive factors of the business (such as the countryside setting and accessibility) and has developed mitigation measures to ensure that the Proposed Development would not have a significant environmental effect on HFWP. The Applicant refers to sections 14.1.79 to 14.1.82 of **ES Volume 4, Appendix 14.2: Effects on Individual Agricultural and Non-Agricultural Business Receptors [EN010158/APP/6.4] [REP5-044]** which provide further detail on this point.
3.21	**Greg Smith MP [REP6-098], Page 2, Para. 6**	Comment noting that concern remains over the long-term responsibility and funding arrangements for the disposal of large volumes of battery waste at the end of the Proposed Development's operational life, particularly given the complexity and potential cost of managing such materials. Comment noting that greater clarity is required on who would be responsible for decommissioning and waste disposal should the site operator cease trading, and whether adequate safeguards are in place to prevent these liabilities falling to the public purse.	The Applicant submits that it has appropriately addressed these issues in its responses at **Refs. 13.3.29 and 13.3.30** of the **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]**. The Applicant notes in its response at Ref 13.3.30 that disposal of decommissioned materials is highlighted in Section 2.10 of the **Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4.6] [REP5-071]**. This section outlines that the waste hierarchy will be applied and that the "Best Available Treatment Recovery and Recycling Techniques" will be utilised. Any cost implications will not override the commitment to recycling the Proposed Development as far as practicable. Further, the Applicant explains in its response at **Ref. 13.3.29** of the **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]** that EDF Energy Renewables Limited (trading name EDF power solutions, previously known as EDF Renewables) is the majority shareholder of the Applicant and would take responsibility for decommissioning the Proposed Development in accordance with the **Outline DEMP [EN010158/APP/7.4.6] [REP5-071]** should Rosefield EnergyFarm Ltd not be in operation at that time. The financial robustness of EDF Renewables, which is ultimately supported by its parent within the EDF group, is set out in the **Funding Statement [EN010158/APP/4.2] [APP-017]**.
3.22	**Statkraft UK Limited [REP6-110], Page 4, Paras 2.3 to 2.7**	Comments setting out the interface between the Proposed Development and the East Claydon Greener Grid Park project (East Claydon Project). Further comment that, without 'adequate protection' the compulsory	The Applicant refers to the **Statement of Reasons [EN010158/APP/4.1.4] [REP5-010]** which sets out at section 5 the detailed justification for the inclusion of compulsory acquisition powers in the **Draft DCO [EN010158/APP/3.1.10]** in accordance with section 122 of the Planning Act 2008.

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		acquisition powers that the Applicant is seeking risks the deliverability for their East Claydon Project.	The Applicant wishes to clarify that, as noted at paragraph 2.4 of Statkraft's submission, the Applicant is seeking rights for the creation and compulsory acquisition of new rights (including, where necessary, a right to impose restrictive covenants) over plot 7/2 (the Interface Land) (see sheet 7 of the **Land Plans [EN010158/APP/2.2.4] [REP3-004]**). It is not, as is otherwise stated within the submission, seeking to permanently acquire the Interface Land. The Applicant maintains that while it is justified to have compulsory acquisition powers at its disposal in the **Draft DCO [EN010158/APP/3.1.10]** to secure the meaningful and timely contributions offered by the Proposed Development to UK decarbonisation and security of electricity supply, the Applicant's preferred approach is to secure land and access rights via agreement. The Applicant has also managed to agree terms with various statutory undertakers regarding the use and management of compulsory acquisition powers in the **Draft DCO [EN010158/APP/3.1.10]** (see, for example, the agreed protective provisions with Anglian Water Services and Thames Water Utilities Limited included at Schedule 15 of the **Draft DCO [EN010158/APP/3.1.10]**). The Interface Agreement currently being negotiated between the Applicant and Statkraft provides adequate protection to Statkraft (and the deliverability of the East Claydon Greener Grid Park project (the East Claydon Project)) in relation to the use of compulsory acquisition powers and interactions between the Proposed Development and the East Claydon Project in the context of the existing Option Agreement that Statkraft has the benefit of over the Interface Land. Accordingly, the Applicant considers that, once the Interface Agreement is agreed, the Secretary of State will be able to be satisfied that any extinguishment of right or removal of apparatus is necessary for the Proposed Development and that adequate protections are in place for Statkraft. As stated in the **Status of Negotiations with Statutory Undertakers [EN010158/APP/8.9.5] [REP6-066]** submitted at Deadline 6, the Applicant is confident that the Interface Agreement will be agreed between the parties and has not, to date, identified any roadblocks that would prevent that from happening.
3.23	**Statkraft UK Limited [REP6-110], Pages 4 & 5, Paras 3.1 to 3.6**	Comments stating that an interface agreement has not been finalised between the Applicant and Statkraft, and that the Applicant has not been engaging in a timely manner.	The Applicant disagrees with Statkraft's comments that it has failed to engage with Statkraft in relation to the negotiation of the draft Interface Agreement or that it has not engaged in an adequate manner. The Applicant received the draft Co-operation Agreement and draft Crossing Agreement on 30 April 2026 (together, the Interface Agreement) and conducted an initial review of those documents. Prior to issuing its first round of comments, the Applicant engaged with Statkraft to identify and clarify several key issues that informed the length, detail and complexity of the two draft agreements that Statkraft had initially provided to the Applicant for review. The Applicant has issued two sets of comments to Statkraft on both the draft Co-operation Agreement and draft Crossing Agreement since its preliminary queries were addressed and is currently awaiting Statkraft's response to comments issued on 7 August 2026.

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			The Applicant made extensive comments on the first draft of both agreements including requests for clarification on the scope and applicability of certain clauses and has, in two rounds of comments, closed out several issues and agreed the terms of a number of central clauses. The Applicant refers to its update in **Status of Negotiations with Statutory Undertakers [EN010158/APP/8.9.5] [REP6-066]** submitted at Deadline 6 and maintains that the points in dispute continue to reduce with each draft of the Interface Agreement and that the Applicant is confident that all remaining issues can be resolved. The Applicant acknowledges that Statkraft has submitted a set of preferred protective provisions in response to the ExA's **Rule 17 letter [PD-019]**. However, Statkraft has confirmed to the Applicant that it will continue to negotiate the Interface Agreement with the Applicant post-Deadline 6. The Applicant will continue to progress the negotiation once Statkraft returns its comments on both agreements and considers that, subject to review of those comments, the Interface Agreement can be agreed before the end of the examination or shortly thereafter.
3.24	**Statkraft UK Limited [REP6-110], Pages 6 & 7, Paras 5.1 to 5.7**	Comments that, as the interface agreement has not been concluded, protective provisions are the appropriate mechanism to ensure that the Proposed Development does not impede on the delivery of the East Claydon Project. The proposed protective provisions are included in Schedule 1 of the submission.	The Applicant refers to the relevant entry in the **Status of Negotiations with Statutory Undertakers [EN010158/APP/8.9.5] [REP6-066]** submitted at Deadline 6. The Applicant acknowledges that Statkraft has submitted a set of preferred protective provisions (ECEL PPs) at Deadline 6 in response to the ExA's **Rule 17 letter [PD-019]**. However, the Applicant maintains that, as previously agreed between the parties, an interface agreement is the most appropriate mechanism through which to manage any interface between the Proposed Development and the East Claydon Project in a balanced and streamlined manner. This is because the East Claydon Project has been consented under the Town and Country Planning Act 1990 (the EC Planning Permission) which does not afford the Applicant the opportunity to seek to include reciprocal protective provisions as part of that consent. The Applicant understands from various correspondence with Statkraft and from its submission at Deadline 6 **[REP6-110]**, that Statkraft will likely need to obtain further planning permission (in addition to the EC Planning Permission) under that same regime to eventually connect to the replacement East 3 Claydon 400kV Substation (the Replacement Substation). The Applicant further understands that the layout of the East Claydon Project identified by the redline boundary in the EC Planning Permission is indicative only. As a result, the exact extent and complexity of the interactions between the Proposed Development and the East Claydon Project are currently unknown. An interface agreement is the most appropriate mechanism to address this uncertainty both in respect of the level of eventual interaction between the two projects and the content of any further planning permissions required. An interface agreement can also contain all protections required by both parties in relation to the use of powers under the respective planning permissions (including those set out at paragraph 5.3 of Statkraft's submission) and the mechanisms and processes needed to ensure a safe and streamlined construction period to minimise risk of delay for both projects.

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			The Applicant notes that the ECEL PPs are a close reproduction of the protective provisions for the protection of EDF Energy (Thermal Generation Limited) included at Part 18 of Schedule 15 of the Cottam Solar Park Project Order 2024. The ECEL PPs do, however, contain additional detail in relation to commitments by the parties to co-operate during the execution of works and the management of temporary works. The ECEL PPs also contain a far stricter access provision. The Applicant agrees that these issues are central to any interface between the Proposed Development and the East Claydon Project and, noting the currently unknown extent of interactions between the projects, submits that these issues would be afforded more appropriate detail and consideration in an interface agreement. As noted above and in the **Status of Negotiations with Statutory Undertakers [EN010158/APP/8.9.5] [REP6-066]** submitted at Deadline 6, the Applicant is confident that the Interface Agreement will be agreed and Statkraft will be adequately protected as the proponent of the East Claydon Project once that agreement is in place. The Applicant will provide an update to the ExA or the Secretary of State (as relevant) once the Interface Agreement has been completed.
3.25	**Statkraft UK Limited [REP6-110], Pages 6 & 7, Para 6.3**	Comment that the Applicant has not demonstrated that the entirety of the land forming plot 7/2 on the Land Plans is reasonably required for the Proposed Development and that the extent of plot 7/2 subject to compulsory acquisition powers is not justifiable in terms of the legal tests and relevant guidance.	The Applicant rejects Statkraft's suggestion in its submission **[REP6-110]** that the Order Limits are comprised of 'indiscriminate areas of land' and that the Applicant has not demonstrated compliance with section 122 of the Planning Act and the *Guidance related to procedures for the compulsory acquisition of land* (DCLG, 2013) (CA Guidance) in respect of plot 7/2 (the Interface Land). The Applicant has clearly set out the justification for the land and rights required to deliver the Proposed Development in the **Statement of Reasons [EN010158/APP/4.1.4] [REP5-010]**. Relevantly, that document contains detailed discussion of the need for the Proposed Development (section 5.1), policy support for the Proposed Development (section 5.2) and alternatives to compulsory acquisition that have been considered by the Applicant (section 5.6). The Applicant refers to the **Statement of Need [EN010158/APP/5.6] [APP-036]** which details the case underpinning the need for the Proposed Development and its contribution to meeting key national policy aims including decarbonisation to achieve net zero, delivering clean energy supplies, achieving power system stability and adequacy and the provision of affordable electricity. All of the Interface Land included in the Order Limits (identified as plot 7/2 in the **Land Plans [EN010158/APP/2.2.4] [REP3-004]**) is required to achieve the identified purpose of delivering the Proposed Development. The Interface Land is identified in the **Works Plans [EN010158/APP/2.3.7] [REP6-004]** as land required for the Grid Connection Cabling Corridor to facilitate connection to the replacement East 3 Claydon 400kV Substation (the Replacement Substation). As Statkraft have flagged in its submission, the exact location of the Replacement Substation is not yet known. Accordingly, the Applicant requires some level of flexibility in respect to the Grid Connection Cabling Corridor alignment within the Order Limits to ensure that the energy generating component of the Proposed Development can connect to the grid. This concept accords with

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			approaches taken on other recent made DCOs for solar developments (including The Cottam Solar Project Order 2024 and The West Burton Solar Project Order 2025) and provides the Applicant with the opportunity to finalise the ultimate alignment of the grid connection cable route at the detailed design stage informed by the confirmed location of the Replacement Substation. The Applicant acknowledges that the Proposed Development must be considered on its own merits for compulsory acquisition purposes and submits that it is clear that the Interface Land is required to deliver the Proposed Development and that delivery of the Proposed Development is firmly in the public interest which satisfies the relevant tests in the Planning Act 2008 and accord with the CA Guidance. In relation to the exercise of any compulsory acquisition rights granted within the **Draft DCO [EN010158/APP/3.1.10]**, the Applicant notes that its powers of acquisition under Part 5 of the **Draft DCO [EN010158/APP/3.1.10]** are limited by article 22(1) (and article 22(2)) to allow the Applicant to compulsorily acquire only so much of the Order Limits as is required for the authorised development, or to facilitate it, or as is incidental to it. The obligation to only acquire what is required applies at the point when the compulsory acquisition powers are exercised. Relevantly for the Interface Land, the same principle applies to the acquisition of new rights and imposition of restrictions under article 24. Further, as set out above, the Interface Agreement will, once agreed, provide Statkraft with adequate protections in respect the use of compulsory acquisition powers over the Interface Land. The Applicant submits that issues in dispute continue to steadily reduce with each draft of the Interface Agreement and considers that the agreement can be agreed by the parties before the end of examination or slightly thereafter.

Appendix 1

NatureSpace Preliminary District Licence Report

Application Document Ref: EN010158/APP/8.46
Planning Inspectorate Scheme Ref: EN010158

NATURESPACE
PARTNERSHIP

NatureSpace Great Crested Newt
District Licensing Scheme

Preliminary District Licence Report

Rosefield Solar Farm

202406007

19 August 2026

Notes for planning officers

This is not the final Report for submission – this Report is provided to the applicant to explain the financial contribution required to join the scheme and does not contain the final requirement wordings.

Rosefield Energyfarm Ltd will submit a Construction Environmental Management Plan (CEMP) to include the District Licence binding requirement wordings to comply with great crested newt mitigation and compensation requirements for this protected species. It is expected that a Requirement of a Development Consent Order would stipulate that this CEMP would be approved in writing by the Local Planning Authority.

Buckinghamshire Council should issue a formal authorisation to work under the District Licence when:

If/when the Development Consent Order has been granted:

- The CEMP amendment has been approved, so that it contains the District Licence requirement wordings
- The NatureSpace Certificate has been presented to the Council by Rosefield Energyfarm Ltd

Quick, Simple, Certain, Sustainable

Report version

Version	Date	Description
1	19/08/2026	Provisional site assessment for Rosefield Solar Farm, confirming entry into the Scheme in principle. Site assessment will be updated to align with development plans following DCO approval.

Contents

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Executive Summary

NatureSpace Partnership has been commissioned by Rosefield Energyfarm Ltd to undertake a preliminary great crested newt (GCN) District Licence assessment of the proposed Rosefield Solar Farm scheme. This Report gives projected costs for accessing the relevant GCN District Licence at an early stage, when site plans have yet to be completely finalised.

Should a District Licence authorisation be sought, then a further and final assessment of the finalised site plan will be necessary to obtain a full NatureSpace Report, for submission in support of a DCO. The necessary conditions listed below (which provide the link between the consented development and the planning system) should be included in the relevant Environmental Management Plan(s), for approval by the LPAs following the issue of a Notification of Decision Letter. In this case it is expected that the relevant plan will be a Construction Environmental Management Plan (CEMP), and this report is produced in anticipation of a DCO Requirement which states a need for this document to be approved by the Local Planning Authority (LPA). The approving LPA will then be able to authorise the works under the District Licence in-line with their approval of the CEMP.

Report Scope

This report details the results of the latest District Licence impact assessment undertaken by NatureSpace Partnership on 10th July 2025. The assessment followed the agreed processes and protocols as set out in the District (organisational) Licence granted to Buckinghamshire Council (WML-OR152) and this report summarises how the Rosefield Solar Farm can be dealt with under the Buckinghamshire District Licence for great crested newts.

Route for entry to the District Licence Scheme

This report follows a preliminary analysis conducted in July 2025. This Report provides an initial costing and impact assessment information to enable entry to the scheme. It is understood that the site boundary and masterplan have been amended since this initial assessment, and an updated assessment will be required to incorporate these changes. This is not the final Report for submission – this Report is provided to the applicant to enable the financial contribution required to join the scheme and does not contain the final requirement wordings, which will need to be included in a CEMP if/when the DCO is granted. Following payment of the required financial contribution, NatureSpace will issue certification of scheme entry, and a further issue of this Report will be provided for submission to the LPA for approval, alongside the CEMP.

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Preliminary second-stage fee estimate: £939,521 (+VAT)

The second-stage fee estimate has been calculated in proportion with the habitat impacts. In the absence of a final detailed plan, a range of assumptions detailed in this report have underpinned the assessment. The ultimate second-stage fee would be calculated and fixed upon assessment of the finalised masterplan.

Draft licensing requirements

Three requirements (equivalent to planning 'conditions') will apply to access the District Licensing option when (if) DCO is approved by the Notification of Decision Letter. These should be added to the CEMP for submission to and approval by the LPA, in order to enable a route for the LPA to authorise the development (or vary the conditions in future, if necessary).

- **Draft requirement 1** links the development consent and permitted impacts to the relevant District Licence (this requirement must be included in the CEMP)
- **Draft requirement 2** requires the developer to submit a NatureSpace certificate (obtained upon second-stage payment) to the Council before the development can be authorised under the District Licence (i.e. the certificate is presented to the planning authority as part of and prior to the CEMP approval process)
- **Draft requirement 3** would specify the on-site mitigation measures:
    - For the red zone areas within the site boundary, it would impose some on-site mitigation measures which would include best practice working methods, restrictions on timing to avoid sensitive periods (relating to ponds and hibernation features), use of capture methods at suitable habitat features prior to development, and amphibian fencing and pitfall trapping to clear newts from the site prior to works (see page 6 and Annex 1)

Timing requirements

To enable authorisation under the District Licence, sufficient compensatory habitat must be delivered off-site through the scheme in advance of any impacts. In large-scale projects, this can require a lead time between payment and authorisation if sufficient ponds are not in-place at the time of the second stage payment. As the project progresses, liaison with NatureSpace is advised to determine whether a lead-in time is necessary, and if so to explore payment plan options to reduce or eliminate any delays to authorisation.

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Background information

Great crested newts are a European protected species (EPS) and are protected in the UK under the Conservation of Habitats and Species Regulations 2017 (as amended) and, to a certain extent, the Wildlife and Countryside Act 1981 (as amended). Where works would harm this species or its habitats, a licence is required in order to make those activities lawful. Natural England is the licensing authority and has granted great crested newt 'District Licences' to certain Councils in England. This enables those Councils ('Licensees') to issue authorisations to developers for specific parcels of development land, without further application (by the developer) to Natural England. This report details whether and how the proposed development can be dealt with under the relevant District Licence and contains technical details relating to planning and licensing requirements.

Developments which utilise the District Licensing Scheme contribute proportionately (depending on the impacts of each development proposal) to the conservation strategy. This funds the creation, management, and monitoring of local compensation sites. NatureSpace and the Newt Conservation Partnership take on all responsibilities for compensation delivery, 25 years of management and monitoring, and annual reporting to Natural England.

Project reference: 202406007

Developer name/organisation: Rosefield Energyfarm Ltd

Site name: Rosefield Solar Farm

Site grid reference: SP 7197 2415

Development Consent Order Name: Rosefield Solar Farm (PINS reference EN010158)

Development impact map reference (upon which this initial assessment is based): "Rosefield Solar Farm: Impact plan for great crested newt District Licensing (Version 1)", dated 10th July 2025

Consultant ecologist name & organisation: Porscha Thompson, RSK Biocensus Limited

Date of habitat survey information (upon which this assessment is based): July 2024. Survey information to underpin a licensing assessment should be less than two years old. Since more than two years has passed since the survey (i.e., after July 2026), then it is necessary to undertake a walkover survey to confirm the assessment remains valid before an Authorisation can be issued to permit the start of works.

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District Licence summary

1. Confirmation the proposal can be dealt with under the District Licence: Yes

2. Impact Risk Zone Split: Red 24%, Amber 48%, Green 27%, White 1%

3. National Character Area: Upper Thames Clay Vales; Midvale Ridge

4. Is any in-situ great crested newt compensation required: No

5. Are there any working restrictions relating to great crested newts: Yes —the following requirements apply in the red zones:

- Best practice working and use of reasonable avoidance measures (see 'Great Crested Newt Mitigation Principles' required under condition 17 of the District Licence)
- Timing and working restrictions in relation to ponds
- Removal or disturbance of newt hibernacula must only take place during the active season (generally mid-February to mid-October, dependant on the season and weather conditions)
- Capture of newts using hand/destructive/night searches at suitable habitat features prior to ground clearance
- Amphibian fencing and pitfall trapping to clear newts from the site prior to works (in this case this will apply to all suitable habitats within 250 metres of ponds)

6. Required planning conditions (if consent is granted): See next page

7. Impact metric score: -57.23.

8. Financial 'second-stage' contribution required to contribute to delivery of strategic great crested newt conservation, proportionate to the impacts of the proposal: £939,521 (+VAT).

This report confirms that, subject to the requirements listed above (sections 4 - 8), the development proposal can be covered under the District Licence (WML-OR152, or a 'Further Licence') provided that the outlined requirement wordings are added to an CEMP which is subsequently approved by the Secretary of State.

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Planning conditions and informatives

This sets out drafts of the planning requirements which will apply if a Development Consent Order is to granted approval by the Secretary of State. Usually, under the District Licence, conditions are applied by planning authorities to planning approvals which link the permission and the specific impacts to the use of the relevant District Licence. For a Development Consent Order, these conditions/requirements are added into the OEPMS to be approved by the LPA, subsequent to approval of the DCO in a Notification of Decision Letter.

These draft requirement/condition wordings will not be finalised until the production of the final CEMP, if/when the DCO is granted.

A full District Licence report will need to be submitted in support of the DCO application to demonstrate how the requirements of the Habitats Regulations are being dealt with in regard to great crested newts. In accordance with the District Licence, the following draft requirements and informatives would then need to be included in the CEMP, for approval by Buckinghamshire Council, in order for the Council to be able to then authorise these works under their District Licences. Without these requirements in-place, it would not be possible for the works to be authorised under the District Licence.

Draft requirements:

Draft Requirement 1. No development hereby permitted shall take place except in accordance with the terms and conditions of the Council's Organisational Licence (WML-OR152, or a 'Further Licence') and with the proposals detailed on plan "Rosefield Solar Farm: Impact plan for great crested newt District Licensing (Version 1)", dated 10th July 2025.

Reason: In order to ensure that adverse impacts on great crested newts are adequately mitigated and to ensure that site works are delivered in full compliance with the Organisational Licence (WML-OR152, or a 'Further Licence'), section 19 of the National Planning Policy Framework, Circular 06/2005 and the Natural Environment and Rural Communities Act 2006.

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Draft Requirement 2. No development hereby permitted shall take place unless and until a certificate from the Delivery Partner (as set out in the District Licence WML-OR152, or a 'Further Licence'), confirming that all necessary measures regarding great crested newt compensation have been appropriately dealt with, has been submitted to and approved by the planning authority and the authority has provided authorisation for the development to proceed under the district newt licence.

The delivery partner certificate must be submitted to this planning authority for approval prior to the commencement of the development hereby approved.

Reason: In order to adequately compensate for negative impacts to great crested newts, and in line with section 19 of the National Planning Policy Framework, Circular 06/2005 and the Natural Environment and Rural Communities Act 2006.

Draft Requirement 3. No development hereby permitted in the red zone shall take place except in accordance with Part 1 of the Great Crested Newt Mitigation Principles, as set out in the District Licences (WML-OR152, or a 'Further Licence') and in addition in compliance with the following:

- Works to existing ponds onsite may only be undertaken during autumn/winter, unless otherwise in accordance with the Great Crested Newt Mitigation Principles.
- Works which will affect likely newt hibernacula may only be undertaken during the active period for amphibians.
- Capture methods must be used at suitable habitat features prior to the commencement of the development (i.e., hand/destructive/night searches), which may include the use of temporary amphibian fencing, to prevent newts moving onto a development site from adjacent suitable habitat, installed for the period of the development (and removed upon completion of the development).
- Amphibian fencing and pitfall trapping must be undertaken at suitable habitats and features, prior to commencement of the development.

Reason: In order to ensure that adverse impacts on great crested newts are adequately mitigated and to ensure that site works are delivered in full compliance with the Organisational Licence (WML-OR152, or a 'Further Licence'), section 19 of the National Planning Policy Framework, Circular 06/2005 and the Natural Environment and Rural Communities Act 2006.

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Informatives:

It is recommended that the NatureSpace Best Practice Principles are considered and implemented where possible and appropriate.

It is recommended that the NatureSpace certificate is submitted to this planning authority at least 6 months prior to the intended commencement of any works on site.

It is essential to note that any works or activities whatsoever undertaken on site (including ground investigations, site preparatory works or ground clearance) prior to receipt of the written authorisation from the planning authority which permits the development to proceed under the District Licence (WML-OR152, or a 'Further Licence') are not licensed under the great crested newt District Licence. Any such works or activities have no legal protection under the great crested newt District Licence and if offences against great crested newts are thereby committed then criminal investigation and prosecution by the police may follow.

It is essential to note that any ground investigations, site preparatory works and ground / vegetation clearance works / activities (where not constituting development under the Town and Country Planning Act 1990) in a red zone site authorised under the District Licence but which fail to respect controls equivalent to those detailed in the planning condition above which refers to the NatureSpace great crested newt mitigation principles would give rise to separate criminal liability under the District Licence, requiring authorised developers to comply with the District Licence and (in certain cases) with the GCN Mitigation Principles (for which Natural England is the enforcing authority); and may also give rise to criminal liability under the Wildlife & Countryside Act 1981 (as amended) and/or the Conservation of Habitats and Species Regulations 2017 (as amended) (for which the Police would be the enforcing authority).

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Activities and operations under a District Licence

The District Licence contains a ‘Protocol for activities and operations affecting great crested newts within the licensed area’ (see Annex B of the licence) – which contains a list of activities, operations, and licensable acts. The full list does not apply in every authorisation under the District Licence. This report details the activities, methods and acts which would be permitted for the proposed development, based on the impacts as assessed.

Permitted activities and operations under the District Licence (subject to receiving planning consent and written authorisation from the planning authority)**:**

A3—Pond creation, enhancement, and management

A4—Terrestrial habitat creation, enhancement, reinstatement, and management

A5—Capture, exclusion, and relocation of great crested newts from terrestrial and aquatic habitat. Permitted methods:

- by hand,
- hand searches of suitable features,
- destructive searches,
- bottle traps,
- pitfall traps and refuges,
- night/torch searching,
- nets,
- exclusion fencing (including exclusion by, upright and one-way temporary amphibian fencing)
- drift fencing
- ring-fencing water body

Note this includes fence installation and removal. Note also that the above activities may only be carried out by someone with an appropriate great crested newt licence. Further details are contained in the NatureSpace Great Crested Newt Mitigation Principles/Best Practice principles.

A6—Relocating great crested newts at imminent risk of harm on Development Land. Permitted methods:

- by hand,
- hand searches,
- destructive searches

A7—Site clearance—including removal of vegetation, hard-standing, buildings and landscaping

A8—Removal of rubble and log piles and other potential hibernacula

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A9—Drain down ponds, ditches, and waterbodies

A10 —Fill-in ponds, ditches, and waterbodies

A11—Construction activities

Note that in this case, the activities and operations referenced A3, A9, and A10 and the aquatic activities listed under A5 are not required under the licence but will be included in the authorisation, to legally permit those activities should you have need for them (e.g., for aquatic habitat creation or if pond drainage is required in order to carry out enhancement activities).

Licensable acts which would be made lawful by an authorisation for the proposed development under the District Licence:

Capture; Possess; Transport; Take eggs; Disturb; Killing & injuring; Damage & destroy resting places; Damage & destroy breeding sites.

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Protocol Conditions

Annex B of the District Licence is a 'Protocol for activities and operations affecting great crested newts within the licensed area' and includes a number of additional 'Protocol conditions'. The full list does not apply in every authorisation under the District Licence. This report details the 'Protocol conditions' which would apply to this site, based on the impacts as assessed.

Protocol conditions (which would apply upon authorisation)**:**

P1 Before any works commence on a site in the Red Zone all those persons involved with the licensable works are to be briefed by someone suitably experienced by way of a 'tool box talk' on:

a. how to identify great crested newts
b. what to do should great crested newts be found, including good working practices and
c. what is and is not permitted under the licence.

P2 Certain activities permitted by this licence require ecological expertise. Activities subject to this condition can only be carried out by an ecologist with an appropriate great crested newt Survey Licence or under the direct supervision of such a person.

P3 Where licence or protocol conditions refer to publications, licence users are expected to refer to the most up to date iteration available. Natural England can direct users to the relevant iterations.

P4 The biosecurity guidelines in Amphibian Disease Precautions: A guide for UK fieldworkers, Advice Note 4 (available from www.arguk.org) must be observed by all licence users.

P5 Great crested newts must not be relocated outside the Licensed Area, over a distance greater than 1 kilometre or beyond a significant physical barrier to dispersal without the permission of Natural England.

Note: the 'Licensed Area' refers to the district covered by the Planning Authority's District Licence. See the NatureSpace Great Crested Newt Mitigation Principles for full detail about protocols for translocation of newts under the District Licence.

P6 Any animal listed in Schedule 9 Part 1 (but not Part 1A or 1B) of the 1981 Act which is a species which is not ordinarily resident in England in a wild state, that is caught in a trap set under this licence must not be released or allowed to escape back into the wild; it must be humanely despatched, unless a specific licence to release that species has been obtained, or alternative advice has been provided by Natural England.

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P8 Persons capturing newts under this licence are expected to follow the advice on welfare considerations for capture programmes in the 'Great Crested Newt Mitigation Guidelines' available from Natural England.

P11 Great crested newts are not to be translocated to Compensation Land or other locations within the Licensed Area unless the terrestrial and/or aquatic habitats are suitable for great crested newts. The suitability of the site is to be confirmed by a suitably qualified person (e.g., an ecologist with a great crested newt survey licence).

P12 Any licensable activities in the red zone must be carried out in accordance with the approved Great Crested Newt Mitigation Principles.

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Aquatic impacts

In this section, the aquatic impacts of the proposed development are summarised. Impacts on aquatic habitat may be direct or indirect. Waterbodies on the development site and up to 500 metres away are considered, depending on the presence of barriers to newt movement.

Total number of great crested newt-accessible waterbodies within 500m: 124

Aquatic impact details:

Impact type	Total number of waterbodies affected
Unimpacted	105
Degraded	0
Damaged	0
Directly lost	0
Indirectly lost	0
Temporarily impacted	19
TOTAL:	**124***

*See the impact plan issued alongside this report for further details.

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Terrestrial impacts

This part of the report summarises the terrestrial impacts. Impacts on terrestrial habitats may be direct or indirect.

Hibernation features present on site? Yes

Total site area: 688.536 ha; 397.764 ha within the compensable scope of this assessment (<250m of ponds)

Terrestrial impact details:

Impacts permitted / prohibited?	Total area (ha) of terrestrial habitat excluding null habitat e.g. hardstanding
Permanent impacts permitted	17.245
Temporary impacts (< 1 year) permitted	380.518
Unimpacted - impacts prohibited*	0
Indirect impacts - impacts prohibited**	0
TOTAL:	**397.764ha**

*Areas where impacts are prohibited are within the planning red line boundary, but are considered unimpacted by the works proposal and are not included within the licence cover area.

**Off-site suitable habitat considered functionally lost to great crested newts due to the loss of all existing ponds within 250m of such habitat, as a result of the development.

Total terrestrial habitat with permitted permanent impact	Total area (ha)	Good/moderate terrestrial Area (ha)
Within 250m of a pond:	17.245	7.017
TOTAL:	**17.245ha**	**7.017ha**

Total terrestrial habitat with permitted temporary impact	Total area (ha)	Good/moderate terrestrial Area (ha)
Within 250m of a pond:	380.518	192.026
TOTAL:	**380.518ha**	**192.026ha**

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Landscape-Level Assessment

Connectivity assessment: Highly connected to waterbodies and priority habitats for migration and dispersal with low levels of fragmentation and no permeability barriers.

Range assessment: Low impact to wider landscape great crested newt distribution/range.

Contribution to Strategic Opportunity Area: Site is located within a Strategic Opportunity Area and is of moderate importance.

Prospects assessment: Moderate.

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Other relevant information:

This Report is intended to confirm, in principle, a route through the Scheme for Rosefield Solar Farm. The outcomes of the preliminary assessment, and thus the contents of this draft report, are based upon non-detailed development plans, and are subject to change once detailed plans are provided. Furthermore, this provisional outcome is contingent on the application of the temporary impact category denoted in plan "Rosefield Solar Farm: Impact plan for great crested newt District Licensing (Version 1)", dated 10th July 2025.

The duration of temporary impacts to habitats cannot exceed 365 days from the date of first commencement of Destructive Works within the area demarcated. Before the final day of permitted impact, habitat restoration work must be undertaken to enable habitat to return to the pre-impact condition (or better). In order to formalise these assessment outcomes, Rosefield Energyfarm Ltd must first provide NatureSpace with evidence of an appropriate phasing plan that complies with the requirements of this impact category.

An obligation will be applied to the parts of the site that are within the red zone to adhere to the GCN Mitigation Principles to reduce risk of harm to great crested newts. The required sub-clauses of condition/requirement 3 are to be executed at the discretion of the site ecologist who should determine which habitats are suitable for great crested newt and therefore where the mitigation requirements apply.

Works to existing onsite ponds onsite may only be undertaken during autumn/winter. This requirement will apply to any ponds on site which are suitable for newts (based on the HSI score and suitability of terrestrial habitat), and which will be damaged or destroyed during development. This requirement is intended to ensure that pond drain down is undertaken outside the great crested newt breeding season, which likely to be is the least harmful time of year to undertake such works. If it is essential that a suitable great crested newt pond is drained down in the spring or summer, an intensive trapping exercise at the pond is acceptable, please see the Great Crested Newt Mitigation Principles for more details.

The requirement that removal or disturbance of newt hibernacula must only take place during the active season (generally mid-February to mid-October, dependant on the season and weather conditions) has been triggered. This applies to likely great crested newt hibernacula that would need to be identified by a suitably qualified and experienced ecologist before they undertake a 'tool box talk' and advise on-site personnel accordingly.

The requirement for capture methods to be used at suitable habitat features has been triggered in this case because the proposals involve removal of suitable terrestrial habitat within 250m of a pond.

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It is the responsibility of the ecologist acting as an accredited agent under a District Licence authorisation to use their professional discretion to identify any suitable habitats where mitigation requirements will apply, during their site walkover before works begin. It is advisable that detailed records are kept of any decision-making regarding the implementation of mitigation measures during site works.

The requirement for amphibian fencing, pitfall trapping and the use of capture methods at suitable habitats and features has been triggered in this case due to the damage to terrestrial habitats close to great crested newt waterbodies. It is the responsibility of the ecologist acting as an accredited agent under a District Licence authorisation to use their professional discretion to identify any suitable habitats where mitigation requirements will apply, and which methods are most appropriate for those habitats.

It is recommended that current management practices persist on-site during the timeframe between this Report issue and Authorisation under the District Licence. This is to ensure the site does not become more suitable for great crested newts in the interim period.

Planning appeals

In the event that the proposed development is refused, and a subsequent appeal made to the Planning Inspectorate, the District Licence documents will need to be reconfirmed by NatureSpace and then submitted to PINs as part of the appeal documentation. The applicant should contact NatureSpace in the event of an appeal to expedite this. Failure to do so could mean that the development would not be able to receive authorisation under the District Licence if approved at appeal.

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District Licence – Conditions of use

Once authorised, a developer becomes an 'Authorised Developer' under the Council's District Licence, which includes certain conditions of use (in addition to any planning conditions). When working under a District Licence, Authorised Developers are advised to retain ecological support from an appropriate ecological consultant, and it is recommended that that the NatureSpace 'Best Practice Principles' are adhered to.

There are some specific licence conditions for Authorised Developers to note:

- Authorised Developers authorise (in writing) their employees, officers, or contractors to act under the District Licence as Accredited Agents or Assistants.
- Authorised Developers must ensure that all persons working under the District Licence have the appropriate knowledge, training, and experience to undertake licensed activities in accordance with the terms and conditions of the licence and best practice. For example, where capture of newts is required, this operation must be undertaken by, or supervised by, someone with the appropriate experience and training (and licence to handle newts).
- All persons working under the licence must comply with the terms and conditions of the licence.
- In the red zone, Authorised Developers must comply with the approved Great Crested Newt Mitigation Principles (the separate 'Best Practice Principles' are a recommendation for all developments operating under a District Licence and the 'Great Crested Newt Mitigation Principles' are a mandatory requirement in the red zone).
- Authorised Developers may (on application to the Planning Authority) request a transfer of an authorisation to another developer.
- Authorised Developers must keep certain records and provide these to the Planning Authority or to NatureSpace in a timely manner. Records must be kept of:
    - All persons, companies and organisations authorised to act under the licence and in what capacity
    - Details of licensed activities: dates work commenced and was completed; aquatic and terrestrial impacts; any in-situ compensations; details of any great crested newts captured/moved, etc.
    - Any changes to development land (including management changes)
    - Any surveying/monitoring information
    - Any incidents or reports of activities in breach of the licence or the great crested newt planning conditions (including details of action taken, such as disciplinary and remedial actions)
    - Any other material plans or records relating to the use of the District Licence.

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- Authorised Developers must permit an officer of Natural England reasonable access to monitor work being undertaken under the authority of the District Licence.
- Natural England must be informed of any breaches to the District Licence within 48 hours of any person becoming aware of a breach. The Licensee will take any necessary steps to address any breaches or poor practice.
- A failure to comply with the terms and conditions of the District Licence by an Authorised Developer, their Accredited Agents or Assistants will, by default, render the authorisation for the development site null and void.

Important:

This report is not an authorisation to work under a District Licence.

Authorisations are only issued by the Licensee, in writing and only for developments that are in receipt of a valid planning permission, and which have paid any necessary compensatory payments to the Compensation Scheme.

Enquiries:

For any enquiries relating to this report please contact NatureSpace Partnership:

Email: info@naturespaceuk.com

Tel: 01865 688307

Website: https://naturespaceuk.com/

For any enquiries relating to District Licensing, please contact either NatureSpace Partnership, your planning authority or Natural England - gcndll@naturalengland.org.uk

Annex 1: Development Impact Map & Impact Risk Zone Map

List of figures:

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Rosefield
Solar Farm

rosefieldsolarfarm.co.uk

Application Document Ref: EN010158/APP/8.46
Planning Inspectorate Scheme Ref: EN010158