



Rosefield Solar Farm (EN010158)

Buckinghamshire Council's comments on Deadline 7 Submissions

Buckinghamshire Council

August 2026

Introduction

Buckinghamshire Council has reviewed the documents submitted by the Applicant at Deadline 6 and provides the following comments on substantive matters arising from those submissions. These comments should be read alongside the Council's Relevant Representation, Local Impact Report, Local Impact Report Addendum, Written Representations, responses to the Examining Authority's questions, Closing Summary Statement and all other submissions made throughout the Examination.

The Council's position remains unchanged. Whilst the Council acknowledges that a number of matters have narrowed throughout the Examination and that progress has been made through amendments to the Proposed Development and associated application documents, the Council remains of the view that significant concerns persist in relation to, in particular, ecology, landscape and visual effects and cumulative effects. These are key issues among the other concerns, highlighted in the Council's submissions, which remain extant at the end of the Examination. For that reason, and given the limited time, the Council has not sought to comment on documents generally, including in particular on Closing Summary Statements.

The Council notes that the Applicant's Closing Statement identifies cumulative effects and biodiversity as matters of continuing disagreement between the parties. The Council's purpose in making the following submissions is therefore not to repeat evidence already before the Examination, but to address substantive matters arising from the Applicant's Deadline 6 submissions which are relevant to those outstanding areas of disagreement.

In the Council's view, the Applicant's Deadline 6 submissions do not materially alter the principal concerns identified throughout the Examination. Rather, they provide additional evidence which reinforces the Council's longstanding concern regarding the cumulative consequences of the concentration of major energy and infrastructure projects within this part of Buckinghamshire.

Cumulative Effects

The Council has reviewed the Applicant's updated *Interrelationships with other Nationally Significant Infrastructure Projects and Major Development Schemes* report [REP6-069]. The Council notes that the report identifies a number of projects with the potential to give rise to cumulative effects, including East West Rail, HS2, East Claydon BESS, East Claydon Greener Grid Park, Tuckey Solar Farm and Longbreach Solar Farm. The report further recognises the potential for significant cumulative effects in relation to landscape and visual receptors and biodiversity receptors, particularly in respect of Bechstein's bats.

The Council considers that the report confirms our concerns regarding the concentration of major energy and infrastructure developments in and around East Claydon and the surrounding rural area. The report acknowledges that a number of cumulative landscape and visual effects remain potentially significant and that these effects arise from the combined

presence of multiple large-scale infrastructure schemes within a relatively confined geographic area.

Whilst the Applicant concludes that no additional significant cumulative effects have been identified beyond those assessed in the Environmental Statement, the Council considers that the report reinforces the need for the Examining Authority to consider the Proposed Development within the context of the wider large scale nationally significant infrastructure projects coming forward in the area. This includes the existing East Claydon Substation, HS2, consented and proposed battery storage facilities, operational and proposed solar farms, and other strategic infrastructure projects progressing through the planning process.

The Council also notes that no direct engagement has yet been undertaken with East West Rail or Longbreach Solar Farm, notwithstanding the Applicant's acknowledgement that cumulative effects may arise in relation to those schemes. The Council therefore considers that there remains a degree of uncertainty regarding the practical implementation of future coordination measures and the extent to which cumulative effects can be mitigated through project-level management arrangements.

Notwithstanding the above, the Council agrees that the report does not materially alter the cumulative effects position previously presented during the Examination. Rather, it provides further evidence of the scale of infrastructure change occurring within this part of Buckinghamshire and supports the Council's position that cumulative landscape, visual and ecological effects should be afforded substantial negative weight in the Examining Authority's conclusions.

Highways Access

Whilst the Council is satisfied that the proposed access arrangements are acceptable in highway terms, the assessment conducted by the local highways authority did not consider the specific needs and concerns of Preston Farms Ltd and TCS Biosciences Ltd. As a result, this should not be interpreted as the Council expressing a view on the separate issues raised by those businesses on their operations, biosecurity, animal welfare, tenancy arrangements, compulsory acquisition or other private interests, all of which fall outside the Council's role as local highway authority. The Council note the significant concerns that remain in this regard, and also highlight the Council's previously expressed view (which remains) that a precautionary approach would be appropriate in respect of those businesses.

Ecology

The Council has reviewed the Applicant's Deadline 6 submissions and confirms that its substantive position on ecology has not changed. The Council remains concerned regarding the potential effects of the Proposed Development on Bechstein's bats, ecological connectivity, the adequacy of proposed buffers, and concern relating to the long-term habitat

management, monitoring and remedial measures. Those concerns have been set out in the Council's previous submissions and remain unresolved.

The Council notes the Applicant's updated cumulative effects assessment submitted at Deadline 6. Whilst this does not alter the Council's conclusions on ecology, it is noted that the assessment acknowledges the potential for cumulative effects arising from the interaction of the Proposed Development with other major infrastructure and energy projects within the area. The Council considers that this reinforces its longstanding concern that ecological impacts should not be considered in isolation and that the cumulative effects on ecological networks, habitat connectivity and protected species, including Bechstein's bats, require careful consideration in the overall planning balance. The Council remains of the view that the significance of those cumulative ecological effects has been understated.

The Council remains of the view that Biodiversity Net Gain should be afforded limited weight in the planning balance. Whilst habitat enhancement proposals are welcomed, the site comprises an ecologically sensitive landscape and the biodiversity metric does not fully capture the functional ecological value of that landscape or the potential displacement and behavioural effects experienced by species such as Bechstein's bats.

The Council notes that ecology and biodiversity have remained active areas of Examination throughout the process, including further amendments to the scheme design, revisions to ecological management measures, additional evidence relating to protected species, biodiversity net gain, natural capital and wintering and nesting bird interests. The Council therefore remains concerned that cumulative and in-combination ecological effects arising from the concentration of major energy infrastructure projects in the locality should be assessed robustly and precautionarily. The Council does not consider that the absence of significant effects from individual projects, considered in isolation, is sufficient to demonstrate the absence of significant cumulative effects.

Other Matters Arising from Deadline 6

The Council notes the correspondence submitted on behalf of Preston Farms Limited and TCS Biosciences Limited regarding the disclosure of option agreements between the Applicant and the Claydon Estate [AS-042]. The Council does not seek to comment on the substantive private interests or contractual matters raised in that correspondence. However, insofar as the Applicant has relied upon provisions of those agreements during the Examination, the Council considers that the Examining Authority should have access to such information as it considers necessary to properly understand and test the evidence before it, subject to any appropriate arrangements for the protection of genuinely commercially sensitive information. It would also be open to the Secretary of State to request that this information be provided, once she has received the Examining Authority's report.

Finally, the Examining Authority will be aware that the Council suggested changes to the draft DCO and certain management plans at Deadline 6. The Council hope that the Applicant updates its documents in response to this. If it does not, the Council note that it would be open to the Secretary of State to seek further information in relation to these issues, once she has received the Examining Authority's report.

Conclusion

The Council considers that the Applicant's Deadline 6 submissions do not materially alter the overall planning balance previously presented during the Examination. Whilst the Council acknowledges the contribution that the Proposed Development could make towards renewable energy generation, the latest submissions reinforce the Council's concern regarding the cumulative effects arising from the interaction of the Proposed Development with other major infrastructure and energy schemes. This sits alongside the ecological, landscape, and other concerns that the Council has raised throughout the Examination. In the Council's view, those effects remain a significant and material consideration which should attract substantial negative weight in the Examining Authority's recommendation and the Secretary of State's decision.