Rosefield Solar Farm (EN010158)

Rosefield Solar Farm - Principal Areas of Disagreement Statement

Buckinghamshire Council

March 2026

Introduction

This document summarises the principal areas of disagreement between Buckinghamshire Council and the Applicant based on the submitted Environmental Statement, subsequent clarifications, and the Council's Local Impact Report. It sets out the key issues where significant concerns remain, the reasons why the Council considers the Applicant's assessment or mitigation to be inadequate, and the remedy measures that would be required to address those concerns. As a summary document it is necessarily not comprehensive. It is also preliminary and will be refined over time alongside the SoCG reflecting the position between the parties.

The tables distinguish between matters that are outstanding or in dispute and those that are largely resolved, reflecting the current position in Statement of Common Ground discussions. For the avoidance of doubt, that a point of disagreement remains in respect of a topic does not mean that the issue has not been assigned "neutral" or "positive" impact in the LIR. Further detail on all these matters are set out in the LIR.

Table 1 – Outstanding Principal Areas of Disagreement

Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
Site Selection	Site selection process appears to have been driven primarily by single landowner availability, not by a constraints-led or environmentally proportionate assessment. Lack of evidence that other land parcels within the 10km search area were identified, evaluated or discounted on environmental, landscape or planning grounds. No clear demonstration that the Applicant considered alternative locations for the	Provide an alternatives assessment, demonstrating a constraints-led approach to site selection across the full 10km search area. Reassess all available land parcels (inside and outside the willing landowner area) against ecological, landscape, heritage and PRoW sensitivity. Undertake a comparative assessment of alternative BESS locations, including fields D18/D19 and E10/E11, supported by modelling of: • noise	Low

Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
	BESS, including less visually sensitive parcels. Insufficient assessment of the undulating landform, which intensifies visual prominence from PRoWs and settlements. Failure to consider whether flatter or more enclosed areas both within and outside the landholding could reduce landscape, heritage or ecological harm. Incomplete exploration of opportunities to co-locate the BESS with existing or consented energy infrastructure, including the National Grid substation and consented BESS sites. Dismissal of fields E10 and E11 not supported by proportionate evidence on flood risk, pylon clearances or noise/visual implications. Insufficient justification for selecting fields D8/D9 for the BESS despite elevated, visually exposed, and heritage-sensitive context. No transparent assessment showing whether alternative layouts within the Order Limits could avoid highest-sensitivity landscape,	• visual effects • flood risk • pylon clearance • access feasibility Relocate the BESS away from fields D8/D9 to a less visually elevated and less heritage-sensitive parcel with better containment. Demonstrate that the chosen layout represents the least-harm option within the Order Limits, evidenced through sequential design testing. Provide an options appraisal for co-location with existing or consented infrastructure, especially the National Grid substation and adjacent consented BESS. Include detailed topographical and ZTV-led analysis showing how alternative siting could reduce visual harm. Revisit design to avoid siting infrastructure in parcels within the highest ecological sensitivity, including areas forming critical habitat connectivity. Supply full justification for why alternative land parcels could not be used, aligned	

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	ecological and heritage receptors. Issues related to removal of panels from PV for ecological and landscape reasons are addressed in the appropriate section below.	with EN-1 and EN-3 requirements for proportional alternatives assessment.	
Ecology	Inadequate survey effort for Bechstein's bat, including no radiotracking, despite national-level significance of the Bernwood population. High risk of significant harm to a genetically vulnerable and isolated Bechstein's population within the Core Sustenance Zone of Finemere Wood. Solar infrastructure proposed in key foraging and commuting fields (B6, B7, B8, B10, B11, D28, D29), contrary to advice from Natural England, BBOWT, and Council's position. Proposed buffers below VALP NE8: insufficient setbacks from ancient woodland, other woodland, and hedgerows. Loss of approx. 2,060m of hedgerow, including 1,310m permanent, leading to fragmentation of ecological	Remove solar infrastructure (arrays, cabling, compounds) from key bat foraging/commuting fields B6, B7, B8, B10, B11, D28 and D29. Undertake radiotracking surveys to establish current bat commuting routes, core foraging areas and roost connectivity. Provide updated bat activity data, including May–September coverage and maternity period monitoring. Implement HS2-style flight-line monitoring, both pre-construction and operational, to detect changes in bat movement patterns. Increase all ecological buffers to comply with VALP NE8: • 50m to ancient woodland • 25m to other woodland	Low

Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
	networks in the Bernwood Opportunity Area. Inadequate assessment of temporary construction impacts, including cabling routes affecting ground-nesting birds. Compensation land for ground-nesting birds not yet identified or secured; required at minimum 2:1 ratio. Lack of HS2-style flight-line monitoring for bats; monitoring proposals too high-level. Cumulative effects with HS2, East West Rail, solar/BESS schemes under-assessed, despite overlapping ecological constraints.	• 10m *each side* of all hedgerows Redesign layout to maintain continuous, dark, uninterrupted ecological corridors between Sheephouse Wood, Shrubs Wood, Finemere Wood and Runt's Wood. Identify and secure compensation land for ground-nesting birds at a minimum 2:1 replacement ratio. Provide surveys and assessment of temporary works, including cabling routes, compound locations and haul roads. Provide a detailed monitoring strategy, covering bats, ground-nesting birds, and wider farmland bird assemblages. Avoid artificial lighting in all sensitive parcels and secure a strict dark-sky strategy.	
Arboriculture	Incomplete ground-truthing of trees, leading to unreliable RPAs and uncertainty over impacts on retained features. Insufficient protection for veteran and ancient trees,	Undertake full ground-based arboricultural survey to replace reliance on aerial interpretation and confirm accurate RPAs. Recalculate and enlarge RPAs for all veteran, ancient and future-veteran trees; apply	Medium

Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
	and no clear allowance for future veteran potential. Drainage and construction activity located within woodland buffers, undermining their purpose and increasing risk of hydrological change. Inconsistent treatment of woodland edges, with buffers measured from centreline rather than edge, reducing effective stand-off distance. Lack of clarity on decommissioning impacts, including future excavation near sensitive tree roots. No Outline Arboricultural Method Statement to demonstrate that works near trees/hedgerows can be undertaken safely. Several attenuation basins, swales and drainage features are located within or directly adjacent to woodland buffers, undermining buffer function and risking ecological and hydrological impacts. Lack of clarity over whether drainage features have been designed to avoid encroachment into Root Protection Areas, woodland	enhanced buffers where required. Prohibit all construction activity within woodland and hedgerow buffers, including cabling, drainage and temporary compounds. Relocate all attenuation ponds, surface-water features, trenches and excavations currently shown within or immediately adjacent to woodland buffers. Produce an Outline Arboricultural Method Statement (AMS) setting out: • permitted construction methods near trees • trenchless techniques for cabling • vehicle exclusion zones • protection fencing specification • Provide future-growth modelling for trees and hedgerows to show long-term compatibility with solar infrastructure. • Clarify decommissioning impacts, including avoidance of excavation close to retained trees and woodland edges. • Remove infrastructure from HS2 woodland compensation planting areas, maintaining ecological connectivity intended by HS2's mitigation.	

Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
	edges, and established habitats.		
Landscape and Visual	Significant adverse effects on landscape character across the Claydon Bowl, Hogshaw Claylands, Twyford Vale and areas within the Aylesbury Vale Area of Attractive Landscape. Undulating landform and elevated settlements (particularly Botolph Claydon) increase visibility of solar arrays and the BESS, resulting in an industrialising effect inconsistent with the rural character of the Vale. Severe visual harm to users of nearby PRoWs, especially the Bernwood Jubilee Way, where views toward and from ridge-top sections would become dominated by solar arrays and BESS structures. BESS location in fields D8/D9 is highly visually exposed, introduces large-scale engineered massing and noise fencing, and conflicts with settlement setting and key panoramic views.	Remove or relocate solar arrays from the most visually sensitive and elevated parcels, particularly within Parcels 1 and 2 and fields D28–D29. Relocate the BESS from fields D8/D9 to a more visually contained parcel such as: Fields E10–E11 (adjacent to the existing substation) • Fields D18–D19 (south, reduced intervisibility with settlements/PRoWs) Introduce stronger, landscape-led mitigation using landform-responsive woodland belts and structural planting rather than reliance on hedgerow infill. Increase setbacks from PRoWs and reduce enclosure effects by avoiding over-planting that alters currently open rural character. Provide a revised cumulative LVIA reflecting full combined impacts with HS2, EWR, National Grid works, and	Low

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	Mitigation proposed by the Applicant (hedgerows, fencing, localised planting) is insufficient and in some cases worsens impacts by enclosing formerly open rural views or introducing incongruous fencing. Cumulative landscape effects with HS2, EWR, existing/consented BESS, and other solar developments are under-assessed and materially understate combined impacts on rural character and tranquillity.	other local solar/BESS schemes. Revisit LVIA significance judgements using a precautionary approach that reflects low landscape capacity and high sensitivity of PRoW users.	
Cultural Heritage	Under-assessment of the contribution of setting to significance, particularly in relation to Claydon House, its parkland, and its historic outlying estate farms. Insufficient consideration of important designed and associative views, including those from upper storeys of Claydon House and outward estate vistas from Knowle Hill and other historic viewpoints. Homogenisation of the historic agricultural setting, replacing historic field patterns with linear engineered infrastructure.	Re-siting of the BESS further from Botolph Claydon and sensitive ridge-top viewpoints. Removal or relocation of solar arrays from the former estate landscapes south of Orchard Way and from fields forming important components of the Claydon House setting. Improved, locally appropriate planting proposals, avoiding enclosure that erodes historic openness or screens key views from heritage assets. Refinement of the setting assessments, including additional verified viewpoints	Low

Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
	Cumulative intensification arising from other major infrastructure (HS2, EWR, other solar/BESS schemes), which amplifies the extent of harm to an already pressured historic environment. Understated impacts on Conservation Areas, including erosion of rural approaches and loss of agricultural character fundamental to their significance.	from Claydon House's principal rooms and from Botolph Claydon approaches. More analysis of historic landscape character, acknowledging the coherence and time-depth of the estate landscape.	
Population and Human Health	No consolidated Population and Human Health assessment in the ES; topic chapters were treated in isolation rather than through a health lens. The Health and Wellbeing Summary does not apply IEMA/ISEP Health in EIA methodology, so significance judgements are unclear and inconsistent. No identification of vulnerable or high-exposure groups (e.g. older residents, schoolchildren, local workers, users of PRoWs near the BESS). Lacks demographic analysis to understand differential health effects, particularly for	Provide a standalone consolidated Population and Human Health assessment, as requested by the Examining Authority. Apply ISEP (formerly IEMA) Health in EIA methodology, including health-specific significance criteria. Identify vulnerable groups and receptors most sensitive to noise, traffic, dust, landscape change and loss of access. Produce an integrated assessment of combined effects, rather than isolated topic-by-topic analysis. Assess and mitigate effects on PRoW users, including impacts on mental wellbeing	Medium

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	receptors closest to the BESS and construction routes. Combined (cumulative) effects of noise, construction traffic, air quality, landscape change and PRoW disruption not assessed together. Potential for increased stress, anxiety and loss of amenity, especially for residents near construction routes and PRoWs adjacent to the BESS. Limited analysis of temporary construction effects, including dust, HGV noise, vibration and disruption to daily movement patterns. Does not address health impacts of severance for communities reliant on PRoW networks for recreation and mental wellbeing. No clear assessment of how access to green space, tranquillity, or recreational walking routes will be affected. Applicant acknowledges the need for further information but has not yet provided a coherent, standalone Human Health chapter.	from loss of tranquillity and increased noise. Provide clear assessment of construction-phase exposures (dust, HGV movements, vibration, temporary diversions, noise). Include mitigation for community amenity, such as avoiding peak school hours for HGV movements and improving PRoW accessibility. Provide a complaints and rapid-response mechanism for residents during construction and operation. Improve mitigation for operational noise around the BESS where significant effects may arise from low background levels. Clarify how the development will maintain or improve access to recreation, green space and safe walking routes during construction. Commit to an updated package of mitigation in the OEMP to ensure ongoing protection of health and wellbeing throughout the 40-year operational period.	
Highways and Transport	Insufficient information on traffic volumes during peak	Provide full traffic modelling, including peak-hour flows and	Medium

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	hours, including HGV and LGV distribution during construction. Lack of complete swept-path analysis from the A41 to all site access points. No modelling of local junctions, including those affected by committed developments (e.g. Littleton Green, Waddesdon). Applicant proposes up to 1.12 km of temporary traffic signals, not assessed within the Transport Assessment and likely to cause severe delays. Uncertainty over adequacy of passing places, visibility splays and safe access/egress for construction traffic. Inconsistencies between plans regarding access points serving agricultural operations, risking conflict with farm vehicles and livestock movements. Concerns over cumulative construction traffic with HS2 and East West Rail, where coordinated routing and timing are essential. Need for clarity on compliance with adoptable standards and section 278-type procedures,	assessment of cumulative impacts with HS2 and EWR including committed developments at Littleton Green (Waddesdon). Deliver complete swept-path analysis for all access routes from the A41 to each work compound. Update the Transport Assessment to include impacts of proposed long-section temporary traffic signals, demonstrating safe queueing capacity. Confirm access point design, ensuring compatibility with surrounding agricultural operations and safe livestock crossings. Include a secured mechanism equivalent to a section 278 bond, enabling the Highway Authority to enforce construction quality and reinstatement. Finalise the Outline CTMP to include: • coordinated construction routing with HS2/EWR • pre-booking system for all deliveries • signage strategy approved by Buckinghamshire Council	

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	including mechanisms for quality assurance.	• safe management proposals for Hogshaw Farm peak visitor seasons Provide full technical approval detail, including visibility splays, road safety audits, utilities checks and traffic management plans.	
Public Rights of Way	Several diversions create dead end and right-angle bends. All diversions do not meet minimum width standards (2m for footpath), and definitive widths are not secured. Insufficient assessment of PRoW amenity impacts, particularly where routes pass close to solar arrays or the BESS. Failure to identify or mitigate loss of openness, tranquillity and rural character experienced by users. There is outstanding information on diversions near Pond Farm (SCL/12/1) and other Steeple Claydon links. Missing opportunities to address existing network issues (e.g., dead-end bridleway QUA/41/1).	Provide revised diversion proposals that remove dead ends (e.g. SCL/12/1) and avoid sharp turns or non-desire-line routing. Secure minimum 2m width on all newly created footpaths; include width in the definitive statement. Provide final diversion drawings for land north-west of Pond Farm and other outstanding locations. Enhance amenity through wider mitigation: set back panels, avoid over-enclosure and maintain local rural character. Deliver positive enhancements: new link between Knowl Hill and Knowl Hill Farm diversion/upgrade of QUA/41/1 to resolve bridleway dead-end	Medium

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	Need for improved accessibility measures, such as replacing stiles with mobility gates.	replace all stiles within the red line with accessible gates Secure these measures within the Outline Rights of Way and Access Strategy and associated DCO Requirements. Provide clearer routing plans showing continuity, legibility and safety for walkers, cyclists and equestrians during construction and operation.	
Noise and Vibration	Large-scale construction activity, including HGV movements, plant, machinery and earthworks, risks creating moderate adverse impacts for nearby dwellings. Predicted construction noise levels are close to or above thresholds at several receptors due to very low rural background noise. Temporary construction compounds and haul routes risk localised spikes in noise not fully assessed. Increased traffic on narrow rural lanes risks noise and vibration impacts on sensitive properties. Tonal and low-frequency noise from the BESS cooling systems may be perceptible at	Strengthened Outline CEMP with controls on working hours, plant specifications, routeing and restrictions during sensitive times (e.g. school peaks). Use of quieter plant, acoustic barriers, and full compliance with BS 5228. Commitment to avoid construction-phase activities that generate high noise during early morning, evenings or weekends. Provide detailed routing, HGV timing and traffic noise modelling integrated with highways assessment. Enhanced acoustic mitigation for the BESS:	Medium

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	night given very low background levels. Applicant's methodology acknowledges no exceedance of SOAEL/LOAEL thresholds but underestimates human perception effects in extremely quiet rural conditions. Predicted ~6 dB exceedance above background at some receptors (e.g. near Bernwood Farm) indicates a medium adverse impact, classed as significant in EIA terms. Users of nearby PRoWs may experience loss of tranquillity, especially near the BESS and inverter stations.	• improved enclosure specification • low-noise fan and inverter selection • enhanced acoustic fencing where required Updated BS 4142 assessment incorporating human perception adjustments for very low background levels. Evidence that operational noise will not degrade over time through maintenance schedules and replacement protocols. Commit to ongoing operational noise monitoring, including compliance checks and adaptive mitigation if limits are breached. Relocating the BESS close to East Claydon substation.	
Land and Groundwater	Ground investigations to date are limited in scope, with insufficient data on groundwater depth, flow regime and geotechnical conditions. Insufficient assessment of potential contamination risks, including mobilisation of contaminants during	Undertake comprehensive ground investigation prior to construction, including groundwater monitoring wells, boreholes and geotechnical testing. Provide updated groundwater modelling demonstrating safe separation distances between	High

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	construction or decommissioning. The BESS may be located in areas where shallow groundwater could present risk of pollution pathways or flooding impacts. Incomplete understanding of how earthworks, drainage changes and cabling may affect soil hydrology and groundwater movement. Reliance on generic embedded mitigation without site-specific justification, increasing uncertainty about actual risk levels. Lack of groundwater monitoring, leaving uncertainty about seasonal variability and potential interaction with infrastructure foundations. Limited assessment of land instability risks, including settlement, compaction, or excavation impacts across clay soils. Minerals Safeguarding Assessment currently based on incomplete data, so sterilisation risk cannot yet be confirmed. Potential cumulative effects with nearby major	BESS infrastructure and seasonal high-water levels. Complete a detailed contaminated land risk assessment, including targeted sampling in areas with potential pollutant linkages. Update the Minerals Safeguarding Assessment following pre-construction investigations to confirm no unnecessary sterilisation. Produce a strengthened CEMP, covering: • contamination control • spill prevention • emergency response procedures for hazardous substances • excavation and soil-handling protocols Commit to trenchless techniques or low-impact methods where cabling crosses sensitive hydrological areas. Provide detailed drainage modelling, showing how attenuation, infiltration and surface-water management will avoid altering groundwater flows.	

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	infrastructure (HS2, EWR, National Grid works) not fully assessed in relation to groundwater and land quality. Decommissioning impacts not clearly defined, introducing uncertainty about future excavation risks and contamination mobilisation.	Ensure the Outline OEMP includes long-term monitoring of: • groundwater quality • water table levels • potential pollutant pathways Introduce controls to prevent construction or decommissioning works from occurring in areas at risk of groundwater ingress. Demonstrate how decommissioning will avoid disturbance of any contamination, including safe removal of infrastructure and reinstatement of soils. Provide a cumulative assessment showing interaction with HS2 earthworks, EWR drainage changes, and other local infrastructure.	
Flood Risk and Drainage	Insufficient assessment of run-off pathways across large areas of hard/compacted ground created during construction. Uncertainty over how panel mounting structures, internal access tracks, inverter stations and compounds may alter soil	Supply detailed construction-phase drainage plans, addressing: • stockpile control • silt management • temporary run-off pathways	High

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	permeability or increase localised flood risk. Incomplete information on the existing land drainage network (field drains, culverts, ditches), making impacts on downstream receptors unclear. Lack of detailed explanation of how surface water will be managed during construction, including spoil heaps, stockpiles, and temporary hardstanding. Potential cumulative effects with HS2 and EWR drainage systems, which already alter hydrology in the Claydon and Calvert landscape. No clear commitment on how drainage infrastructure will be maintained over the 40-year operational period, especially attenuation features located in sensitive areas. Uncertainty about how decommissioning will avoid ground disturbance, soil upheaval, and drainage interference near sensitive features.	• protection of nearby woodland and hedgerow bases Commit to no infiltration features in areas with sensitive soils or uncertain groundwater levels unless validated by site investigation. Provide maintenance and inspection schedules for all drainage features, secured through the OEMP/LEMP. Demonstrate that panel layout, access tracks and compounds will maintain existing greenfield run-off rates without increasing flow to downstream receptors. Provide a clear decommissioning drainage strategy, showing how removal of infrastructure will avoid hydrological disruption. Update cumulative assessment to include combined hydrological impacts with HS2 Suds ponds, culverts, and altered watercourses, ensuring the scheme does not exacerbate their effects.	
Air Quality	Assessment lacks clarity on construction-phase dust generation, particularly along	Provide an updated construction dust risk assessment with receptor	High

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	haul routes and near sensitive receptors. Insufficient detail on potential impacts on residential properties, PRoW users and ecological receptors close to construction areas. Limited information on HGV emissions, including frequency, routing and peak-hour movements. No clear link between predicted dust/emissions and mitigation triggers within the CEMP. Cumulative construction effects with HS2 and East West Rail not fully assessed.	mapping and clear significance ratings. Strengthen the CEMP to include: • wheel-washing • road-sweeping • dampening and stockpile controls • dust monitoring stations on site boundaries Commit to real-time dust monitoring at sensitive points, with action thresholds and reporting. Provide HGV movement data and ensure dust/air quality assessment reflects realistic peak construction activity. Include cumulative assessment with HS2/EWR traffic and construction timelines. Secure all air quality mitigation measures through the OEMP/CEMP to ensure enforceability.	
Socio-economics	Assessment does not quantify local employment benefits, nor distinguish between local, regional and national labour supply. Limited understanding of effects on local businesses,	Provide a strengthened Socio-economic Assessment, quantifying: local vs regional employment benefits	Medium

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	especially those dependent on rural tranquillity including TCS Biosciences (e.g., farms, equestrian businesses, wedding venues, holiday lets). No detailed assessment of impacts on agricultural productivity, given 647 ha removed from use for 40 years. Lack of clarity on how construction traffic, noise and PRoW diversions may affect tourism, recreation and community wellbeing. Insufficient consideration of impacts on local service providers, including pressure on road networks that underpin local trade. No quantification of temporary economic disruption for farm operations, farm access routes or grazing arrangements. No assessment of wider effects on community identity and rural character, both material to socio-economic wellbeing.	supply chain opportunities within Buckinghamshire construction workforce numbers and duration Undertake detailed assessment of impacts on local businesses, particularly farms, equestrian centres, tourism operators and rural enterprises. Supply full analysis of agricultural displacement, including compensation, alternative land strategies, and long-term economic loss. Include assessment of how PRoW disruption and landscape change affect recreational value, tourism use and rural wellbeing. Provide mitigation for construction-phase disruption (e.g., scheduled delivery hours, seasonal protection for visitor businesses such as Hogshaw Farm). Commit to local workforce and procurement policies, maximising employment within Buckinghamshire. Supply a cumulative assessment integrating effects of HS2, EWR and other large	

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		projects on the local economy. Secure all socio-economic commitments through the OEMP, including local engagement, notification procedures, and business support measures.	
Materials and Waste	The ES provides limited detail on expected waste arisings from construction, operation and decommissioning. No clear breakdown of waste types, volumes or disposal routes, making it difficult to assess local capacity impacts. Insufficient explanation of how waste will be segregated, recycled or reused, particularly for soils, cabling, packaging and construction materials. Lack of clarity on chain-of-custody controls and how compliance with waste duty-of-care requirements will be demonstrated. Decommissioning proposals are high-level, with no assessment of end-of-life waste volumes, including panels, batteries and inverters.	Provide a detailed Waste Management Plan setting out: • materials required • waste types and volumes • segregation and recycling processes • disposal facilities and licensed carriers Commit to maximum feasible reuse/recycling rates, with clear targets secured in the OEMP. Provide a transparent duty-of-care and audit trail process for all waste movements. Supply decommissioning-phase waste analysis, including panel and BESS recycling pathways. Confirm that local waste infrastructure has sufficient capacity to manage predicted	High

Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
		arisings during peak construction.	
Climate Change	Assessment does not include a full climate-resilience review, particularly for extreme heat, rainfall intensity and long-term soil wetness. Limited analysis of how flood risk, drainage and groundwater changes under climate-change scenarios may affect infrastructure such as the BESS, inverters and access tracks. No clear assessment of cumulative carbon impacts, including embodied carbon in panels, batteries, steel and concrete. Insufficient explanation of how the scheme will remain operationally resilient over a 40-year period in a changing climate. Decommissioning assumptions do not consider future climatic conditions, including increased storm events and hydrological shifts.	Provide a full climate-resilience assessment aligned with UKCP18 projections, covering heat, drought, intense rainfall and wind events. Update drainage and flood modelling to incorporate climate-change uplift and long-term hydrological shifts. Provide a transparent carbon accounting summary, including embodied carbon and lifecycle emissions. Demonstrate how infrastructure (especially the BESS) will remain safe and reliable under future temperature and humidity ranges. Provide a decommissioning strategy that accounts for future extreme weather conditions.	Medium
Cumulative Effects	Assessment underestimates cumulative impacts from major local infrastructure including HS2, East West Rail,	Provide a full cumulative effects assessment, aligned with EN-1 requirements.	Low

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	National Grid works and nearby solar/BESS schemes. Limited analysis of how combined effects on landscape character, PRoWs, tranquillity and visual amenity compound harm for local communities. Insufficient integration of cumulative effects across disciplines (e.g., noise, traffic, landscape, and air quality). Does not adequately consider combined ecological impacts on the Bernwood landscape, particularly for bats and hedgerow networks. Lacks a transparent methodology showing how individual topic assessments were combined into a project-wide cumulative judgement.	Include all relevant nearby schemes: HS2, EWR, existing/consented BESS, National Grid works, and other solar proposals. Assess cumulative effects fully given the size and scope of the Proposed Development, assess proportionately: • landscape and visual receptors • PRoW amenity • human health and wellbeing • bats, hedgerows and woodland connectivity Integrate cross-topic impacts to demonstrate combined pressure on local communities and the environment. Commit to additional mitigation where cumulative impacts remain significant, including layout refinement, strengthened planting, PRoW enhancements and noise controls	

Table 2 - Resolved (or Largely Resolved) Principle Areas of Disagreement

Area of Concern	Explanaton	Remedy Measures	Likelihood of Resoluton
Archaeology	DAMS updated following engagement with BC and Historic England; most concerns addressed pending final version.	Finalise DAMS reflecting agreed trenching , reporting and engagement commitments.	High
Minor Highway Matters	Several CTMP items resolved including signage, HS2 coordination, access management.	Incorporated into revised CTMP.	High
PRoW Enhancements (permissive routes)	Applicant has agreed several new permissive routes.	Secure via OEMP/PRoW Strategy.	High