Rosefield Solar Farm

Draft Statement of Common Ground – Buckinghamshire Council

EN010158/APP/5.22
March 2026
Deadline 1
Rosefield Energyfarm Limited

Table of Contents

1. Introduction

1.1. Overview

1.1.1. Buckinghamshire Council maintains its formal objection to this development for the reasons set out in the Relevant Representations and the forthcoming Local Impact Report. Notwithstanding, there is acknowledgment that as Host Authority, the Council must engage on technical matters.

1.1.2. This Statement of Common Ground ('SoCG') has been prepared in respect of the application for the proposed Rosefield Solar Farm Development Consent Order ("the Application") made by Rosefield Energyfarm Ltd ("the Applicant") to the Secretary of State for Energy Security and Net Zero under section 37 of the Planning Act 2008 ("PA 2008").

1.1.3. The Proposed Development is a proposed new solar farm and battery storage facility located in Buckinghamshire. The proposals also include infrastructure to connect the Proposed Development to the National Grid East Claydon Substation, as well as any necessary supporting site infrastructure and environmental mitigation, including landscaping and ecological planting.

1.1.4. The SoCG is being submitted to the Examining Authority as an agreed draft between both parties. It will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.

1.2. Parties to this Statement of Common Ground

1.2.1. This SoCG has been prepared by the Applicant and Buckinghamshire Council (BC). BC is the host authority for the Proposed Development, as the Order Limits are located entirely within its administrative boundary.

1.2.2. Collectively, the Applicant and BC are referred to as 'the parties'.

1.2.3. The matters of interest discussed with BC are detailed in **Section 4** of this SoCG.

1.3. Purpose of this Document

1.3.1. This SoCG is a 'live' document and will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.

1.3.2. The SoCG has been prepared in accordance with the Ministry of Housing Communities and Local Government and Department for Levelling Up, Housing and Communities' Guidance on the examination stage for Nationally Significant Infrastructure Projects ('DLUHC Guidance').

1.3.3. Paragraph 007 of the DLUHC Guidance comments that:

"A Statement of Common Ground (SoCG) is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree, or indeed disagree. A SoCG helps to ensure that the evidence at the examination focuses on the material differences between the main parties and therefore makes best use of the lines of questioning pursued by the Examining Authority'.

1.3.4. The aim of this SoCG is, therefore, to provide a clear position of the progress and agreement met or not yet met between BC and the Applicant on matters relating to the Application.

1.3.5. The document will be updated as more information becomes available and as a result of ongoing discussions between the Applicant and BC.

1.3.6. The SoCG is intended to provide information for the examination process, facilitate a smooth and efficient examination, and manage the amount of material that needs to be submitted.

1.3.7. This SoCG does not seek to replicate information which is available elsewhere within the DCO Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate's website (https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010158/documents).

1.3.8. Once finalised, the SoCG will be submitted to the Examining Authority that is examining the DCO Application under section 37 of the Planning Act 2008 for an order granting development consent for the Proposed Development.

1.4. Terminology

1.4.1. This SoCG summarises the main topics covered and the status of the matter. The colour coding system used within the table in **Section 4** has been outlined below.

Cell	Status
	Agreed - indicates where an issue has been resolvec
	Under Discussion - indicates where points continue t the subject of on-going discussions between parties.
	Not Agreed - indicates a position where both parties reached a final position that a matter cannot be agre between them.

2. Proposed Development Description

2.1.1. The Proposed Development comprises the construction, operation (including, maintenance), and decommissioning of solar photovoltaic ('PV') development and energy storage, together with associated infrastructure and an underground cable connection to the National Grid East Claydon Substation.

2.1.2. The Proposed Development includes the installation, construction and decommissioning works, with the details to be defined at detailed design and subject to approval by the relevant Local Authority. The detailed design of the Proposed Development will be required to be undertaken within the parameters assessed in the Environmental Statement, which are secured through a range of control documents including the **Works Plans [EN010158/APP/2.3.3]**, the **Design Commitments [EN010158/APP/5.9.3]** and the requirements set out in the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.3]**.

2.1.3. The design of the Proposed Development has evolved throughout the environmental assessment process to avoid or minimise environmental effects and in response to consultation and engagement feedback, where appropriate. The location of the Proposed Development is shown in Figure 1.1: Location Plan in **ES Volume 3, Background and Context Figures 1.1 - 1.2 [EN010158/APP/6.3] [APP-061]** and described in **ES Volume 1, Chapter 2: Location of the Proposed Development [EN010158/APP/6.1] [APP-045]**, with the consideration of alternatives and the evolution of the design of the Proposed Development presented in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**.

2.1.4. The principal components of the Proposed Development include:

- Solar PV development consisting of:
    - Ground mounted Solar PV generating station. The generating station would include Solar PV modules and mounting structures; and
    - Balance of Solar System (BoSS) which comprises: Inverters; Transformers; Switchgear; Combiner Boxes; acoustic barriers and cabling.
- A project substation (the 'Rosefield Substation') compound comprising: Transformers; Switchgear; reactive power compensation bays; disconnectors; circuit breakers; busbars; control equipment; lightning surge arrestors; building(s) including office, control, functions, material storage, material laydown areas and welfare facilities; firewalls; fencing and acoustic barriers; a security cabin; parking as well as wider monitoring, maintenance and emergency equipment;
- A Main Collector Compound and two Satellite Collector Compounds comprising: Switchgear; Transformers; ancillary equipment; operation and

maintenance and welfare facilities; material storage; material laydown areas; fencing and acoustic barriers; and security cabins;

- Battery Energy Storage System (BESS) compound comprising: batteries and associated Inverters; Transformers; Switchgear, ancillary equipment and their containers; office, control and welfare buildings; fencing and acoustic barriers; monitoring, maintenance and emergency systems; air conditioning; electrical cables; fire safety infrastructure; operation (including maintenance) security facilities; material storage; and material laydown areas;
- Interconnecting Cabling Corridor(s) to connect the Solar PV modules and the BESS to the Satellite and Main Collector Compounds to the Rosefield Substation;
- A Grid Connection Cable Corridor to connect the Rosefield Substation to the National Grid East Claydon Substation via 400kV cabling;
- Ancillary infrastructure works comprising: boundary treatment; security equipment; lighting; fencing; landscaping; internal access tracks; works to facilitate vehicular access; earthing devices; earthworks; surface water management; utility connections and diversions; and any other works identified as necessary to enable the Proposed Development;
- Green and blue infrastructure, recreation and amenity works comprising: landscaping; habitat management; biodiversity enhancement; the creation of three permissive footpaths; and works to divert PRoW Footpaths;
- Site-wide operational monitoring and security equipment; and
- Highways infrastructure improvements and safety works comprising: minor junction improvement works; road widening; passing places; and works to facilitate vehicular access to the Site.

3. Record of Engagement

3.1. Record of Engagement

3.1.1. The parties have been engaged in consultation throughout the DCO application process. **Table 1** shows a summary of key engagement that has taken place between the Applicant and BC in relation to the Application.

Table 1 - Record of Engagement

Date	Chapter	Form of correspondence	Key topics discussed and key outcomes
9 May 2023	Cultural Heritage	Email Correspondence	Study area agreed for non-designated and designated assets
19 December 2023	Transport	Teams Meeting	Impact review of transport scoping and potential impact on road network undertaken
26 February 2024	Population	Email Correspondence	Approach to diversion of public rights of way (PRoW) and alignments of new permissive paths agreed
6 March 2024	Cultural Heritage	Teams Meeting	Initial discussion around scope of archaeological fieldwork
04 April 2024	Landscape and Visual	Email Correspondence	ZTV Information provided and proposed maximum height parameters agreed
04 April 2024	Landscape and Visual	Email Correspondence	Discussion on the Zone of Theoretical Visibility
12 May 2024	Landscape and Visual	Email Correspondence	A viewpoint from the HS2 overbridge was deemed unnecessary after Parcel 1A was removed, with visual effects assessed via footpath users instead, as agreed with BC; an additional viewpoint from Addison Road bridge over East West Rail was included
24 May 2024	Air Quality	Email Correspondence	Agreed assessment methodology for air quality

29 May 2024	Landscape and Visual	Teams meeting	Discussion on the rationale for viewpoint selection
30 May 2024	Transport	Teams meeting	Agreed access route assessed
10 June 2024	Noise and Vibration	Email Correspondence	The baseline survey results, including statistical analysis of background sound levels, were fully included and reflected BC's feedback
12 June 2024	Landscape and Visual	Email Correspondence	Request for the experience of users on cycle route No. 51 to considered. Experience of users of cycle route No. 51 has been considered in the assessment
12 June 2024	Landscape and Visual	Email Correspondence	Request for additional views to be considered for HS2 close to Viewpoint 4
12 June 2024	Landscape and Visual	Email Correspondence	Request for the consideration of the screening effect of hedgerows throughout the duration of the Proposed Development. The assessment includes effects as a result of plant growth rates and management strategy
12 June 2024	Landscape and Visual	Email Correspondence	Request for winter views to demonstrate a worst-case scenario for the photomontages. Winter photography has been used the basis for all photomontages
12 June 2024	Landscape and Visual	Email Correspondence	Request for further viewpoints within the Proposed Development and for consideration towards the experience of horse riders on bridleways
26 June 2024	Cultural Heritage	Teams meeting	Discussion around emerging geophysical results and approach to trial trenching

3 July 2024 (and recurring monthly)	Planning	Teams Meeting	Monthly online meetings to provide BC's Planning Officer with regular updates
07 August 2024	Biodiversity	Email Correspondence	Council contact to discuss proposed survey works for protected species
06 September 2024	Cultural Heritage	Email Correspondence	Update on geophysical survey results. Suggested trial trenching strategy shared
09 September 2024	Biodiversity	Teams Meeting	Design principles presented and secured
26 September 2024	Water	Teams Meeting	Meeting with the Lead Local Flood Authority to discuss principles of the development and implementation of SuDs and the drainage hierarchy
26 September 2024	Cultural Heritage	Email Correspondence	Discussions on scope of pre-determination trial trenching
02 October 2024	Landscape and Visual	Email Correspondence	Itinerary of the proposed site visit shared with BC
09 November 2024	Noise and Vibration	Email Correspondence	Agreed methodology for survey was undertaken
25 November 2024	Land and Groundwater	Email Correspondence	BC agreed that sufficient information in the PEIR justified scoping geological hazards out for assessment in the ES
25 November 2024	Land and Groundwater	Email Correspondence	Revised ES assessment methodology issued following comments on the PEIR. Agreement that methodology was acceptable was received from BC on 21 March 2025

10 December 2024	Cultural Heritage	Email Correspondence	Trench plan agreed and draft Written Scheme of Investigation issued for comment
08 January 2025	Cultural Heritage	Email Correspondence	Written Scheme of Investigation for the Trial Trenching agreed
10 January 2025	Cultural Heritage	Email (archaeological advisor – jointly with Historic England)	Updates were made to the archaeological trial trenching written scheme of investigation and issued to the archaeological advisor for comment
15 January 2025	Land and Groundwater	Teams Meeting	Agreed a mineral safeguarding assessment would be provided in advance of the DCO Application to determine whether mineral resources could be scoped out of the ES
16 January 2025	Cultural Heritage	Email (archaeological advisor – jointly with Historic England)	Archaeological trial trenching written scheme of investigation finalised and approved
11 February 2025	Landscape and Visual	Site walkover	Site meeting with BC to review the viewpoints, offsets and proposed footpath diversions
19 February 2025	Water	Teams Meeting	Meeting with the Lead Local Flood Authority to review comments in the Preliminary Environmental Information Report
26 February 2025	Landscape and Visual	Site walkover	Site meeting with BC to review proposed PRoW diversions and permissive routes and clarifications of High Speed 2 (HS2) changes
14 March 2025	Land and Groundwater	Email Correspondence	Mineral Safeguarding Assessment was issued and comments provided on the proposed structure of the assessment
2 April 2025	Arboriculture	Email Correspondence	Email sets out the BC's comments on arboricultural matters and the Applicant's

			response to these comments with a request for further discussion
11 April 2025	Climate	Teams Meeting	Discussion related to the assessment methodology, baseline and mitigation measures. The Applicant has included an assessment of greenhouse gas emissions including a comparison with UK carbon budgets and grid carbon intensity, with expanded and specific mitigation measures and contextual methodology explanations
15 April 2025	Biodiversity	Teams Meeting	Update on the design, mitigation, surveys and enhancement proposals. Queries raised have been addressed in the Outline Landscape and Ecological Management Plan, Biodiversity Net Gain Assessment, and Bat Preliminary Roost Assessment
16 April 2025	Population	Email Correspondence	Agreed the Population Assessment in the ES would exclude health and wellbeing effects
30 April 2025	Water	Teams meeting	Agreed methodology included in Outline Drainage Strategy
12 May 2025	Cultural Heritage	Teams Meeting	Review of trial trenching results and discussion of archaeological management strategy for post-DCO submission
13 May 2025	Arboriculture	Email Correspondence	BC provided a contact for their Arboricultural lead
13 May 2025	Water	Teams meeting	Discussion on the draft drainage strategy for the Proposed Development

06 June 2025	Cumulative Effects	Email Correspondence	Shortlist agreed, request that Longbreach Solar Farm be included
12 August 2025	Cultural Heritage	Email (built heritage advisor)	Discussion of built heritage assets to be scoped into the detailed setting assessment in the ES
13 August 2025	Cultural Heritage	Email (built heritage advisor)	Confirmed that as Shepherd's Furze (NHLE 1214845) listed building had been demolished (with consent) in advance of HS2 and that it could be de-scoped from the assessment
14 August 2025	Cultural Heritage	Email (archaeological advisor)	List of archaeological assets proposed to be scoped into the ES was sent to the archaeological advisor
21 August 2025	Cultural Heritage	Email (archaeological advisor)	Archaeological advisor requested that the nearby scheduled moated site be included in the setting assessment
22 August 2025	Cultural Heritage	Email (archaeological advisor)	Archaeological advisor provided comments on draft archaeological management strategy (AMS). AMS updated
28 August 2025	Cultural Heritage	Email (archaeological advisor)	Archaeological advisor reiterated the request for 4% trenching of hard infrastructure and geophysical anomalies and 2% of remainder of development area to be undertaken pre-construction and form part of the AMS
09 September 2025	Land and Groundwater	Email Correspondence	BC confirmed that it agrees that an assessment of mineral extraction and mineral safeguarding can be scoped out of the ES
12 September 2025	Cultural Heritage	Email (archaeological advisor)	Confirmed that the WWII ammunition dump could be scoped out of the ES

18 September	Arboriculture	Email Correspondence	Arboriculturist lead from BC provided a response with a provisional date for a call to discuss the BC's comments
23 September 2025	Cultural Heritage	Email (built heritage advisor)	Confirmed that East Claydon is not designated as a conservation area but that the group of listed and non-designated assets should be considered within the ES
28 November 2025	Cultural Heritage	Teams meeting (BC archaeological advisor jointly with The National Trust and Historic England)	BC Archaeological Advisor confirmed that their relevant representation had been submitted requesting amendments to the Archaeological Management Strategy
13 January 2026	Biodiversity	Teams meeting	Discussed the Relevant Representation received from BC and the Applicants initial response and amendments to documents that will be made at Deadline 1
15 January 2026	Population	Teams meeting	Discussed the Relevant Representation received from BC and the Applicants initial response and amendments to documents that will be made at Deadline 1
5 February 2026	Cultural Heritage	Teams meeting	Discussed the Relevant Representation received from BC and the Applicants initial response and amendments to documents that will be made at Deadline 1
9 February 2026	Arboriculture	Teams meeting	Discussed the Relevant Representation received from BC and the Applicants initial response and amendments to

			documents that will be made at Deadline 1
13 February 2026	Flood Risk and Drainage	Teams meeting	Discussed the Relevant Representation received from BC and the Applicants initial response and amendments to documents that will be made at Deadline 1
4 March 2026	Land and Groundwater	Teams meeting	Discussed the matters detailed within this Statement of Common Ground and amendments to documents that will be made at Deadline 1.

4. Current Position

4.1. Position of the Applicant and Buckinghamshire Council

4.1.1. Buckinghamshire Council maintains its formal objection to this development for the reasons set out in the Relevant Representations and the forthcoming Local Impact Report. Notwithstanding, there is acknowledgment that as Host Authority, the Council must engage on technical matters.

4.1.2. The following tables set out the position of the Applicant and BC on technical matters, following a series of meetings and discussions with respect to the key areas of the Proposed Development. This includes matters where discussions are ongoing.

4.1.3. As noted above, this is a 'live' document, and some aspects have yet to be agreed upon between both parties. The intention is to provide a final position in subsequent versions of the SoCG, addressing and identifying where changes have been made, and ultimately, documenting agreement by both parties on relevant points.

4.1.4. The parties are in ongoing dialogue and the likelihood that disagreement will remain by the end of the examination for the matters that remain 'under discussion' will be detailed in the SoCG submitted at Deadline 2.

Table 1 - Air Quality

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
1-1	Email Correspondence	Air Quality Method Statement	BC agree with the Air Quality assessment methodology.	**ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]** sets out the agreed methodology**.**	**Agreed**
1-2	Email Correspondence	Air Quality Monitoring Data	BC agree with the Air Quality Monitoring data.	**ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]** sets out the agreed monitoring data.	**Agreed**
1-3	Email Correspondence	Peak year of construction	The air quality assessment states that the peak year for construction traffic is expected to be 2029. However, the Transport Assessment (TA) states that the peak traffic generation is expected in March 2030. It is requested that the applicant confirms when peak traffic generation is expected. It is also requested that the applicant confirms if this discrepancy will have an impact on the outcome of the air quality assessment. If so,	The Transport Assessment (**ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]**) has assumed a future year of 2029, in the event that the Proposed Development commences earlier and to avoid traffic impacts being diluted by a further year of traffic growth. All traffic assessment undertaken are on the basis of 2029 traffic flows. The figures used in both Transport Assessment (**ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]**) and the Air Quality	**Under Discussion**

			there may be a requirement to update the air quality assessment.	Assessment (**ES Volume 4, Appendix 6.1: Air Quality Assessment [EN010158/APP/6.4] [APP-086]**) are the same.	

Table 2 – Biodiversity

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
2-1	Section 42 response / ongoing correspondence	Survey effort	BC agree with the biodiversity survey efforts and data for the following species and habitats: - Great Crested Newt - Badger	**ES Volume 4, Appendix 7.5: Great Crested Newt Habitat Suitability Index and Environmental DNA Report (2023) [EN010158/APP/6.4] [APP-091], Appendix 7.6: Badger Survey Report (2022) (Confidential) [EN010158/APP/6.4] [APP-092]** and **Appendix 7.15: Badger Survey Report (2025) (Confidential) [EN010158/APP/6.4] [APP-101]** set out the survey findings.	**Agreed**
2-2	Section 42 response / ongoing correspondence / Relevant Representation	Survey effort	BC consider that further surveys and/or data are required for the following species and habitats: - Invertebrates (lepidoptera, glow worm, aquatic invertebrates, black and	The Applicant does not consider that further surveys and/or data are required. Full explanatory commentary is set out in **Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029]** and the **Applicant's**	**Under Discussion**

			brown hairstreak butterfly eggs) - Reptiles - Bats - Breeding Birds - Wintering Birds - Trees (Arboriculture)	**Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**. Consideration of these species and habitats is set out in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]**.	
2-3	Section 42 response / ongoing correspondence	Survey and Assessment Methodology	BC agree with the survey and assessment methodology for the following species and habitats: - Arable Plants - Great Crested Newt - Badger - Breeding Birds - Otters and Water Vole	Survey works for these receptors are provided within **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025) [EN010158/APP/6.4] [APP-093], Appendix 7.5: Great Crested Newt Habitat Suitability Index and Environmental DNA Report (2023) [EN010158/APP/6.4] [APP-091], Appendix 7.6: Badger Survey Report (2022) (Confidential) [EN010158/APP/6.4] [APP-092], Appendix 7.15: Badger Survey Report (2025) (Confidential) [EN010158/APP/6.4] [APP-101], Appendix 7.4: Breeding Bird**	**Agreed**

				Survey Report (2022) (Confidential) [EN010158/APP/6.4] [APP-090], Appendix 7.12: Breeding Bird Survey Report (2024) (Confidential) [EN010158/APP/6.4] [APP-098], Appendix 7.3: Wintering Bird Survey Report (2022) [EN010158/APP/6.4] [APP-089], Appendix 7.11: Wintering Bird Survey Report (2024) [EN010158/APP/6.4.2] and **Appendix 7.8: Otter and Water Vole Survey Report (2023) (Confidential) [EN010158/APP/6.4] [APP-094]** which set out the survey findings and survey methodology and **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]** sets out the assessment methodology and conclusions.	
2-4	Section 42 response / ongoing correspondence / Relevant Representation	Survey and Assessment Methodology	BC do not agree with the survey and assessment methodology for the following species and habitats: - Bats - Wintering Birds - Invertebrates	The Applicant does not consider that further surveys and/or data are required. Full explanatory commentary is set out in **Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029]** and the **Applicant's Response to Relevant**	**Under Discussion**

			- Reptiles - Tree (Arboriculture)	**Representations [EN010158/APP/8.3] [PDA-006]** with the full assessment provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]**.	
2-5	Section 42 response / ongoing correspondence	Assessment Conclusions	BC agree with the assessment conclusions for the following species and habitats: - Great Crested Newt - Invasive Species - Arable Plants - Otter and Water Vole - Badger - Bats	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]** sets out the assessment methodology and conclusions for each of the species and habitats.	**Agreed**
2-6	Section 42 response / ongoing correspondence / Relevant Representation	Assessment Conclusions	BC do not agree with the assessment conclusions for the following species and habitats: - Bechstein Bats - Invertebrates - Reptiles - Wintering Birds - Breeding birds	The Applicant considers the assessment for these receptors sufficiently robust to support the assessment conclusions reached. Full explanatory commentary is set out in **Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029]** and the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** and	**Under Discussion**

				ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2].	
2-7	Section 42 response / Relevant Representation	Embedded mitigation	BC do not agree with the use of buffers which do not accord with the minimum specifications set out within local policy.	The Applicant disagrees that buffers are generic. Bespoke offsets have been incorporated into the design of the Proposed Development which have been informed by both the results of surveys and through consultation with stakeholders. Full explanatory commentary is set out in **Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029]** and the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** and **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]**.	**Under Discussion**
2-8	Section 42 response / Relevant Representation	Offset to ancient woodland	BC consider the buffer from ancient woodland should be at least 50m, in accordance with VALP Policy NE8.	A minimum 30m buffer zone is proposed around ancient woodland to prevent root damage and support habitat creation, exceeding the standard 15m guidance from Natural England and the Forestry Commission. These buffers will enhance ecological connectivity between the site, nearby SSSIs, and ancient woodland, benefiting local wildlife such as bats. Additionally, a	**Under Discussion**

				10m buffer is now applied to ditches, aligning with original watercourse proposals. Full explanatory commentary is set out in **Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029]** and the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** and **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]**.	
2-9	Section 42 response	Offset to woodland	BC consider that a minimum 25m offset should be provided for all woodlands.	The embedded mitigation detailed in Table 7.6 of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]** and secured by the **Outline Landscape and Ecological Management Plan (LEMP) [EN010158/APP/7.6.2]** includes a minimum 20m offset from all other woodland that is not ancient woodland which exceeds Natural England's standing advice of 15m. Full explanatory commentary is set out in **Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029]** and the **Applicant's Response to**	**Under Discussion**

				Relevant Representations [EN010158/APP/8.3] [PDA-006] and **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]**.	
2-10	Section 42 response / Relevant Representation	Black Poplar	BC consider that an offset should be provided commensurate with their height plus 15m. BC request that there should be genetic testing for black poplar.	The group of trees with potential to be black poplar is entirely unaffected by the Proposed Development. A substantial buffer has been maintained around these trees, extending well beyond their calculated root protection areas, ensuring these trees are fully protected throughout the works as detailed in **ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4] [APP-099]**.	**Under Discussion**

2-11	Section 42 response	Bats	BC do not agree with the extent of solar panels as they consider that it is likely to cause harm to bats due to changes to the habitat management and reduction of foraging resources in key areas. BC request that panels and/or infrastructure is removed from fields B6,B7,B10 and B11 and fields D28 and D29.	Full explanatory commentary is set out in **Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029],** the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** and **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]**. The Applicant will be providing further detail on the change of habitat management and grazing on bats within the **Bat Technical Study [EN010158/APP/8.5]** that will be issued at Deadline 1 and will continue to discuss this matter with Buckinghamshire Council.	**Under Discussion**
2-12	Section 42 response	Management Plans	Request that individual management plans for all veteran and ancient trees as well as non-ancient woodland and trees with potential to become veteran and ancient trees (inc. those within the hedgerows).	The Applicant does not consider that individual management plans are necessary as no woodland habitat including ancient woodland, veteran or ancient trees would be removed, with mitigation measures to protect woodland and trees detailed and secured in the **Outline LEMP [EN010158/APP/7.6.2]**.	**Under Discussion**

2-13	Section 42 response	Ancient Woodland and Veteran Trees	BC consider that the proposed PRoW diversions should be avoided due to intensification of usage within the buffer zone and increased vulnerability of the woodland.	As detailed in **ES Volume 2: Chapter 7: Biodiversity [EN010158/APP/6.2.2]**, following the application of additional mitigation measures, no direct adverse impacts are predicted on ancient woodlands within and adjacent to the Order Limits through the lifetime of the Proposed Development. Proposed PRoW diversions and new permissive routes in Parcel 1 would be unsurfaced tracks to avoid any physical impacts on the Root Protection Area. The new permissive path route would be 14.5m to the south of Shrubs Wood at the closest point and the closest diverted PRoW (Ref. SCL/13/1) would be 10m to the west of Shrubs Wood. It has been assessed that the PRoW diversions and permissive footpaths would not result in direct or indirect impacts to ancient woodland sites.	**Under Discussion**
2-14	Relevant Representation	Proposed Bat Monitoring	BC do not agree with the proposed bat monitoring and expect that it should include the monitoring of temporary flight lines.	The **Outline LEMP [EN010158/APP/7.6.2]** outlines that monitoring of bat activity would be undertaken during the operation (including maintenance) phase to	**Under Discussion**

	confirm the expected effectiveness of the embedded mitigation and the effect of the Solar PV modules and associated infrastructure on bats. It is proposed that further detail will be added into the Outline LEMP at Deadline 1 of the examination to set out the methodology of the monitoring strategy. Further engagement is proposed with Natural England to discuss this in further detail. This would also confirm that the final bat monitoring within the detailed Landscape and Ecological Management Plan would be submitted to and approved in writing by the relevant local planning authority in consultation with Natural England prior to the operational phase of the Proposed Development. The strategy will be developed in line with CIEEM's Bat Mitigation Guidelines**Error! Bookmark not defined.** (Chapter 9) to monitor the effectiveness of the mitigation proposed in relation to bats. Specific objectives will be set and tested, and remedial actions proposed where objectives are not met. Full	

				explanatory commentary is set out in **Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2]** [APP-029] and the **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [PDA-006] and **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]**.	
2-15	Relevant Representation	Biodiversity Net Gain	BC consider that the BNG requirements have been met.	This is set out in **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2]**.	**Agreed**
2-16	Relevant Representation	DCO Requirement	BC consider that the DCO should require a detailed Arboricultural Method Statement and Tree Protection Plan to be approved and implemented prior to the commencement of any works (including preliminary works) which could affects trees, hedgerows or woodland.	The **Outline Construction Environmental Management Plan (CEMP) [EN010158/APP/7.2.2]** secures the need for a site specific Arboricultural Method Statement ('AMS') and Tree Protection Plan (TPP) to be produced which will detail the exact location and nature of protective fencing, tree pruning, signage, methods of work and protection measures. The commitments in the **Outline CEMP [EN010158/APP/7.2.2]** are secured via Requirement 11 of the **Draft Development Consent**	**Under Discussion**

				Order [EN010158/APP/3.1.3]. Prior to commencement of construction, the Applicant will submit the detailed Construction Environmental Management Plan to BC for approval to discharge this requirement, which will include further detail on the AMS and TPP.	
2-17	Relevant Representation	Arboricultural cumulative impacts	BC consider that a cumulative assessment of the combined losses of arboricultural features across multiple schemes should be undertaken.	BS 5837 assessments are, by design, scheme-specific, and the quantification of cumulative effects across multiple developments is addressed at Environmental Statement level (for example, within the cumulative landscape, biodiversity and land-use assessments), rather than by attempting to merge disparate BS 5837 datasets from other projects. For the Proposed Development, arboricultural losses have been quantified and are clearly reported within **ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment ('AIA') [EN010158/APP/6.4] [APP-099].** For other schemes, compatible survey information (tree categories, RPAs, precise removals) is generally not available in a form that would	**Under Discussion**

				allow a robust combined numerical total, and attempting one would risk being misleading. The Applicant therefore considers the current approach proportionate and consistent with EIA practice, while still allowing the Examining Authority to understand the contribution of the Proposed Development to any wider pattern of change in tree, hedgerow and woodland cover.	

Table 3 – Climate

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
3-1	Meeting / email correspondence	GHG Assessment Methodology	BC agree with the assessment methodology (including inclusion of a comparison with UK carbon budgets and grid intensity) and conclusions.	**ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]** presents a comparison against national and sectoral carbon budgets and against the UK grid carbon intensity. Additional justification on the methodology of the assessment which uses CCGT as a comparison baseline is outlined in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]** considering potential alternative	**Agreed**

				methodologies, as well as a section comparing the Proposed Development against different energy generation technologies.	

Table 4 – Cultural Heritage

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
4-1	Email correspondence / Relevant Representation	Assessment methodology and conclusions	BC do not agree with the cultural heritage methodology and conclusions.	**ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052]** includes all the assets that have been requested to be scoped in and sets out the assessment methodology and conclusions.	**Under Discussion**
4-2	Section 42 response	Trial Trenching	BC agree with the trial trenching survey scope and methodology.	The Applicant undertook pre-determination archaeological investigations in consultation with the host authority at a 4% sample rate of the targeted areas. Results of these surveys and how this has informed the design of the Proposed Development (including approach to mitigation) is included within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052],**	**Agreed**

				ES Volume 4, Appendix 9.2: Geophysical Survey Report [EN010158/APP/6.4.2] and **Appendix 9.3: Archaeological Trial Trenching Report [EN010158/APP/6.4]** [APP-108].	
4-3	Section 42 response	Written Scheme of Investigation	BC request that a detailed Written Scheme of Investigation submitted to detail an appropriate evaluation and mitigation strategy prior to construction and decommissioning works.	The **Draft Archaeological Management Strategy [EN010158/APP/7.10.2]** includes provision for detailed Written Scheme(s) of Investigation for further evaluation and archaeological mitigation to be agreed with BC prior to construction works commencing. Potential impacts to archaeological remains during operation (including maintenance) and decommissioning works are considered within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** [APP-052].	**Agreed**
4-4	Section 42 response	Bernwood Farm	BC consider that development around Bernwood Farm should be avoided as it would annex historically related features.	Bernwood Farm has been considered as part of the Residential Visual Amenity Assessment (**ES Volume 4, Appendix 10.5: Residential**	**Under Discussion**

				Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]) which confirms that the offset of above ground infrastructure from the property is a minimum of 180 metres. Therefore, the setting of Bernwood Farm would be preserved, as would the relationship between the buildings within the farmyard. Bernwood Farm is not a listed building and assessment of effects on this asset were not requested by BC's built heritage advisor.	
4-5	Section 42 response	Significance	BC consider that the contribution to significance should be assessed including how different views, particularly two-way views, designed parkland and agricultural surroundings, historically relate to heritage sites and contribute to their significance.	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment, Annex C and Annex D [EN010158/APP/6.4] [APP-106]** has considered the contribution made by setting to the significance of heritage assets in turn, including the contribution made by designed views. Detailed assessment has been provided for those assets expected to experience significant effects. This has	**Under Discussion**

				included consideration of any designed views, particularly with reference to Claydon House. The list of assets scoped into the assessment has been agreed with Historic England through ongoing engagement as set out in the **Draft SoCG with Historic England [EN010158/APP/5.16]**.	
4-6	Section 42 response	Claydon House, All Saints Church (both listed Grade I) and Claydon Park (Grade II)	BC consider that the setting of Claydon House, All Saints Church (both listed Grade I) and Claydon Park (Grade II) within the surrounding rural landscape could be impacted.	The design of the Proposed Development has evolved to consider the potential effects of the Proposed Development on the setting of Claydon House, All Saints Church and Claydon Registered Park and Garden. Following Phase Two Consultation, the Applicant removed areas of proposed Solar PV panels from Fields B11 and B9 to reduce visibility of the Proposed Development from Claydon House and RPG, as well as reinforcement of the existing tree belt and hedgerow along Three Points Lane. The siting zones for the Satellite Collector Compound and the Satellite Collector Compound Transformer	**Under Discussion**

				in Field B10 (as shown on the **Works Plans [EN010158/APP/2.3.3]**) have been reduced to minimize the impact on these designated heritage assets. Following application of the mitigation measures, the Applicant anticipates a minor adverse (not significant) effect on the heritage significance of Claydon House & RPG during the lifetime of the Proposed Development as set out in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052].**	
4-7a	Relevant Representation	Draft AMS	BC consider that there are a number of amendments required to the Draft AMS.	Amendments will be made to the **Draft Archaeological Management Strategy [EN010158/APP/7.10.2]** and this will be reissued at Deadline 1 to provide clarification on the timing of the archaeological fieldwork, and address the requests for provision for BC's Historic Environment Record to be supplied with copies of all of the trial trenching reports which have	**Under Discussion**

				been approved by BC and Historic England in hard and digital format.	
4-7b	Relevant Representation	Draft AMS	BC remains concerned about the coverage of pre-construction evaluation proposed and would typically require 4% of area of infrastructure or where geophysical survey indicated potential archaeological sites, and 2% otherwise.	The Applicant is concerned by the request for blanket percentage coverages which does not accord with the emerging best practice guidance published by CIFA, FAME, ALGAO and Historic England in 2025. The Applicant considers that an approach whereby site-specific research questions would determine the scope of further evaluation to inform the detailed design would be more appropriate. This approach is aligned with what was agreed with Historic England and Lincolnshire Council for Springwell Solar Farm.	**Under Discussion**

Table 5 – Cumulative Effects

Ref	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
5-1	Email correspondence	Short-list of other existing	BC agree with methodology and with the long and short-list of	**ES Volume 2, Chapter 17: Cumulative Effects**	**Agreed**

		development and/or approved developments	other existing development and/or approved developments.	**[EN010158/APP/6.2.2]** sets out the cumulative effects based on the short list of developments. The Applicant remains committed to updating the cumulative long and short list as new developments come into the public domain, ensuring that the assessment remains as accurate and comprehensive as possible throughout the examination process.	
5-2	Relevant Representation	'Temporary' effects	BC note that 40 years should not be considered as temporary and could lead to permanent consequential effects.	The Applicant considers that operational impacts would be temporary as the Proposed Development would be decommissioned after the 40 year operational lifespan and the land would be reinstated. This approach is consistent with the approach taken on other Solar DCO projects. The Applicant acknowledges that there would be a number of likely significant inter-project residual cumulative effects on landscape and visual and biodiversity as concluded in **ES Volume 2, Chapter 17:**	**Under Discussion**

				Cumulative Effects [EN010158/APP/6.2.2].	
5-3	Relevant Representation	Construction effects	BC consider that cumulative effects during construction would be significant and they consider that consideration should be given to the staggering of construction programmes.	This comment is noted and we welcome further discussion with BC on this matter.	**Under Discussion**

Table 6 – Landscape and Visual Impact

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
6-1	Section 42 response	Study area	Study area to be increased from 5km to 6km to include sensitive receptors at Waddesdon Manor and Wotton Underwood RPGs.	Study area extended to include all potentially sensitive receptors up to a 6km radius. This is illustrated on **ES Volume 3, Figure 10.1: Landscape Study Area, Context and Designations [EN010158/APP/6.3]** [APP-069].	**Agreed**
6-2	Section 42 response	ZTV	Heights of screening elements used for ZTVs should be reduced.	ZTVs were updated using reduced screening heights of 6m for buildings and 10m for woodland. The ZTVs are illustrated within **ES Volume 3, Figures 10.7a to 10.9a**	**Agreed**

				and Figures 10.10a to 10.12b [EN010158/APP/6.3] [APP-069].	
6-3	Email correspondence	Photography	BC requested for photomontages to illustrate the worst-case scenario using winter photography.	Winter photography has been used to illustrate the worst-case scenario for views and photomontage with the exception of one additional view requested in the summer of 2025.	**Agreed**
6-4	Email correspondence	Viewpoints	Viewpoints have been selected and agreed in discussion with BC.	All viewpoints have been agreed and have informed the assessment set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053].**	**Agreed**
6-5	Section 42 response	Hedgerows	BC consider that 4m high hedgerows would require periodic reduction in height over the 40-year life of the Proposed Development thereby affecting magnitude of visual effect.	Woodland trees have been proposed in locations where taller screening elements are required. Hedgerows will be managed to 3-3.5m to screen the Proposed Development which is considered sustainable in the long-term.	**Agreed**
6-6	Section 42 response	Cumulative visualisations	BC consider that visualisations are required to illustrate the visibility of cumulative schemes from more open/elevated viewpoints	Cumulative visualisations for three viewpoints have been included in **ES Volume 4, Appendix 17.3: Cumulative Visualisations [EN010158/APP/6.4] [APP-136].**	**Under Discussion**

6-7	Section 42 response	Visual effects	BC consider that several villages are likely to experience permanent significant adverse visual effects, including Steeple Claydon, Botolph Claydon and Granborough.	The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** reports no significant adverse effect on the visual amenity of residents in any of villages surrounding the Site. Residents of Botolph Claydon and Granborough would experience up to moderate (not significant) effects, those of Steeple Claydon up to moderate/minor adverse (not significant) effects, whilst no other settlements would experience more than minor adverse (not significant) effects.	**Under Discussion**
6-8	Ongoing correspondence	Assessment methodology and conclusions	BC do not agree with the assessment conclusions, particularly related to public rights of way.	The assessment methodology and conclusions are set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053].**	**Under Discussion**
6-9	Relevant Representation	Cumulative landscape character impacts	BC do not agree with the cumulative assessment of landscape character impacts and consider that cumulative landscape character impacts	The assessment and conclusions of the cumulative landscape character are set out in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2].**	**Under Discussion**

			across the district are unacceptable.		

Table 7 – Land and Groundwater

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
7-1	Section 42 response / Email Correspondence	Geological hazards methodology	BC agreed that geological hazards can be scoped out of the assessment.	**Table 11.1** in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2]** sets out the justification for this matter being scoped out of the assessment.	**Agreed**
7-2	Section 42 response	Groundwater assessment methodology	BC consider that the assessment in relation to groundwater levels and flow lacks detail, and specific information on groundwater depth and flow direction is not provided. In particular, the potential for shallow groundwater impacts on the BESS is not discussed. BC considers that the detail of this assessment should be provided.	The assessment provided in **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2.2]** was informed by the information provided in the preliminary risk assessment in **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2]** and intrusive survey information available in **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4]** [APP-125].	**Under Discussion**

		The Applicant will complete further ground investigation (the scope of which will be designed based on the findings of **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2]** and the information from **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4] [APP-125]**, and agreed with BC, and the Environment Agency, where appropriate) prior to any works commencing**.** This is secured in the **Outline CEMP [EN010158/APP/7.2.2]**). It is noted that there is currently little data on the site-specific groundwater conditions. However, this does not change the fact that the groundwater importance is categorised on the basis of the aquifer designations (according to Table 11.6 of **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2.2]**), which are applied by the Environment Agency based on national mapping. Although more information on site-specific groundwater conditions will be	

				collected during ground investigation work that is still to be completed (as secured within **Outline CEMP [EN010158/APP/7.2.2]**), this will allow a better understanding of the specific groundwater regime, but will not fundamentally change the assessment in terms of the groundwater importance, or the magnitudes of impact that are applied for considering groundwater receptors (Table 11.8 of **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2.2]**).	
7-3	Email correspondence	Approach to Mineral safeguarding	BC agreed that mineral safeguarding can be scoped out of the ES.	Mineral resources are covered in the Mineral Safeguarding Assessment which is provided in Appendix 2 to the **Planning Statement [EN010158/APP/5.7.3]**. The Applicant has agreed to update the Mineral Safeguarding Assessment after results of intrusive ground investigation work are available.	**Agreed**
7-4	Section 42 response	Contamination risks	BC agree with the level of ground investigation data and are happy with the Applicant's	A site investigation has been undertaken of some areas within the Site. However, it has not been	**Agreed**

			proposed approach to verifying contamination risks.	possible to undertake intrusive works of the entire Site in advance of the DCO submission. An interpretive report and further site investigations would be undertaken post-consent as set out and secured in the **Outline CEMP [EN010158/APP/7.2.2]**. The scope of the further works would be subject to approval by the local planning authority as secured in the **Outline CEMP [EN010158/APP/7.2.2]**. The scope of the surveys, which includes the targeting of potential sources of contamination identified within the Preliminary Risk Assessment is secured in the **Outline CEMP [EN010158/APP/7.2.2]**.	
7-5	Relevant Representation	Ground Investigation	BC agree with the proposed approach and welcome the addition of ground gas and groundwater monitoring as part of the further Ground Investigation works proposed at pre-construction.	Section 11.5.25 of **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054]** indicates that, in accordance with **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2]**, the identified potential contaminant linkages should be assessed further	**Agreed**

through appropriate pre-construction ground investigation. This investigation is secured by the **Outline CEMP [EN010158/APP/7.2.2]** to target the identified sources of potential contamination and assess the feasibility of identified pathways.

As detailed in and secured by the **Outline CEMP [EN010158/APP/7.2.2]**, the further required phases of ground investigation work will be completed (including groundwater and ground gas monitoring, where appropriate) prior to construction works commencing. The scope will be agreed in advance with BC (and the Environment Agency, where appropriate) and the findings will be issued to BC (and the Environment Agency, where appropriate). Any remedial action required as a result of any findings from the further phases of ground investigation work will be agreed in advance with BC and the Environment Agency, where appropriate, in terms of scope of

				work for remediation, validation and verification.	
7-6	Relevant Representation	Residual effects	BC notes that the assessment of residual effects assumes no significant existing contamination present but states that it is unclear what this is based on, as the findings from the initial ground investigation is not discussed. Following further engagement, BC no longer see this as an issue and agree with this matter.	The 'assumption of no significant contamination' can be made on the basis that ground investigation work is required to identify and provide details on any existing contamination (as secured within **Outline CEMP [EN010158/APP/7.2.2]** (the scope of which will be designed based on the findings of **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2]** and the information from **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4] [APP-125]**) and agreed with BC and the Environment Agency, where appropriate) prior to any works commencing. Any identified contamination would then be required to be remediated, in accordance with a scope of work to be agreed with BC (and the Environment Agency, where appropriate), prior to any construction works commencing. This applies to the potential for	**Agreed**

		existing contamination to be present. There are also measures within the **Outline CEMP [EN010158/APP/7.2.2]**, **Outline Operational Environmental Management Plan (OEMP) [EN010158/APP/7.3.2]** and **Outline Decommissioning Environmental Management Plan (DEMP) [EN010158/APP/7.4.2]** to ensure that if unexpected existing contamination is encountered once construction works commence (or during the operation or decommissioning phases), that works are stopped until an agreed method of remediation and validation is confirmed with BC (and the Environment Agency, where appropriate). It is therefore possible to determine that, after resolution of any issues relating to contamination via these mechanisms, there will be no residual contamination that could result in a significant effect on the groundwater receptor.	

Table 8 – Soils

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
8-1	Section 42 response	Long-term impacts	BC consider that long-term impacts on agricultural land are not adequately addressed, and appropriate mitigation has not been provided.	The Applicant considers that long-term impacts on agricultural land have been addressed. The Proposed Development considers the impacts on agricultural land for a 40-year period which considers the entire duration of the operational phase of the scheme. The land will be returned to its original use following decommissioning. Details of the mitigation to prevent any long-term damage are outlined within **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2] [APP-055]** and secured in the **Outline Soil Management Plan (SMP) [EN010158/APP/7.7.2]**. Following the execution of the mitigation measures there will be no long-term impacts.	**Under Discussion**
8-2	Section 42 response	Survey methodology	BC agree that methodology used for the ALC survey was appropriate.	**ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4] [APP-**	**Agreed**

				126] sets out the survey methodology and ALC survey results.	
8-3	Section 42 response	Agricultural land	BC consider that climate change impacts and farm impacts have not been addressed.	**ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2] [APP-055]** addresses impacts related to soil quality and agricultural land quality. Climate has been assessed as part of the agricultural land classification survey to determine any limitations on agricultural land quality. Wider climate change related matters have been addressed within **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]**, and the Climate Change Resilience Assessment (**ES Volume 4, Appendix 8.2: Climate Change Resilience Assessment [EN010158/APP/6.4] [APP-105]**). Economic farm impacts have been addressed within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**.	**Under Discussion**
8-4	Relevant Representation	Soil classification	BC do not agree with the topsoil classification conclusions and consider that the entire site should be Unit C (Red) - low tolerance to	The Applicant does not agree and has undertaken the ALC survey in line with the Ministry of Agriculture, Fisheries and Food (1988) Agricultural Land Classification for	**Under Discussion**

			structural damage (see Table 2 of the Outline Soil Management Plan (SMP)). They consider that the Outline SMP fails to identify that the soil across the Site is clay.	England and Wales: Revised Criteria for Grading the Quality of Agricultural Land (ALC011) as set out in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]** [APP-055] and **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4]** [APP-126]. The topsoil texture across the site are all heavy textures but the field capacity days across the site are 136-142 therefore as the FCD are below 150 the topsoil classification is Unit B (Orange).	
8-4	Relevant Representation	Cumulative effects	BC would like to see the cumulative assessment updated to include impacts on the local ALC land quality resource.	The cumulative assessment for soils and agriculture is located in **ES Volume 2 Chapter 17: Cumulative Effects [EN010158/APP/6.2.2]**. No significant cumulative effect on agricultural land was found and as only 1.51% of the site was BMV land and as such, further assessment was not needed.	**Under Discussion**

Table 9 – Noise

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
9-1	Email Correspondence	Baseline methodology	BC consider that the methodology and approach to establishing baseline measurements (including the baseline noise measurement locations, report, and results) is appropriate.	The methodology is set out in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]**.	**Agreed**
9-2	Email Correspondence	Assessment approach and methodology	BC disagree with the, magnitude of impact, and likely significant effect.	The assessment approach, methodology and conclusions are set out in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]**.	**Under Discussion**
9-3	Section 42 Response	Public Rights of Way	BC consider that Public Rights of Way users should be considered as a receptor for noise.	Consideration has been given to the noise impacts on PRoW within/adjacent to the Order Limits as detailed in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] Paragraphs 13.8.6 to 13.8.8).** Cumulative effects from other developments on users of PRoW are not anticipated to be any greater than that presented for the Proposed Development in isolation (see Section 13.8 of **ES Volume 2,**	**Agreed**

				Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]).	
9-4	Section 42 response	Working hours	BC request for noisy activities to be constrained to 08:00 – 18:00 Monday to Friday and 08:00 – 13:00) on Saturday.	Construction works would be undertaken during the hours of 07:00 to 19:00 Monday to Friday, and 07:00 to 12:00 on Saturday. Between 07:00 to 08:00 and 18:00 to 19:00 Monday to Friday and 07:00 to 08:00 on Saturdays, noisier activities (such as piling) would be restricted depending on the construction activity proposed to take place and its proximity to sensitive receptors. No construction works would be carried out on Sundays or Bank or Public Holidays without prior agreement with the host authority. This is secured in the **Outline CEMP [EN010158/APP/7.2.2]**.	**Agreed**
9-5	Relevant Representation	Cumulative Noise Impacts	BC are concerned that there will be cumulative noise impacts and consider that that a mechanism should be secured to compel developers to collaborate with other developers to remedy noise complaints.	The potential for cumulative noise impacts has been presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2]**. Inter-project cumulative noise effects during construction and operational	**Under Discussion**

				phases are assessed as being not significant. In relation to the origin of construction noise that could be generated by different development sites in the area, it would be expected that noise levels at or above the adopted British Standard significance thresholds would generally be attributable to works taking place in the vicinity of the affected receptor and therefore readily identifiable in terms of their origin. The mechanism for addressing construction phase complaints is set out in the **Outline CEMP [EN010158/APP/7.2.2]**.	
9-6	Relevant Representation	BESS Noise	BC has queried whether reliance on timber acoustic fencing as the primary acoustic barrier is sufficient, with request for the specification, installation, and maintenance of the barrier to be robustly secured through DCO requirements or consideration of supplementary mitigation.	The requirement and specification of acoustic barriers and/or other appropriate mitigation measures (including refinement of the engineering requirements to adopt lower noise emitting plant, where possible) will ensure that the acoustic mitigation strategy is sufficient to reduce noise to within the adopted criteria.	**Under Discussion**

	BC also comment that ongoing noise monitoring and a clear complaints procedure must be established, with adaptive	There are various material options that can be adopted for the acoustic barriers. Any timber acoustic fencing to be used as a barrier will have suitable material properties such that the level of noise attenuation required to meet the adopted criteria can be achieved. The specification, installation, and maintenance requirements of any acoustic mitigation scheme will be provided prior to operation and is secured by a requirement of the **Outline OEMP [EN010158/APP/7.3.2]**, (Section 2.8 refers). It is proposed that further detail will be added into the **Outline OEMP [EN010158/APP/7.3.2]** at Deadline 1 of the examination to set out the commitment for a clear complaints procedure, including compliance noise monitoring and adaptive control measures, where deemed necessary.	

Table 10 – Population and Human Health

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
10-1	Relevant Representation	Approach to Health Impact Assessment	BC consider that a formal HIA or Heath ES Chapter should have been undertaken, adhering to IEMA guidance with a full and detailed health baseline, engagement and consultation, and an assessment of the potential for impacts for determinants of and pathways to health and wellbeing.	Following feedback from Phase Two consultation **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.2]** has been produced to support the ES and sets out how a compliant assessment has been undertaken in line with IEMA guidance and taking into account BC's advice during the pre-application period. A Health Effects Report which is provided in Annex A of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.2]** will be submitted at Deadline 1.	**Under Discussion**

Table 11 – Waste

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
11-1	Relevant Representation	Assessment of waste	BC note that there is an absence of a detailed assessment for waste in the DCO Application including potential stream of volumes of construction materials and waste disposal, several waste types (including aggregate, soil and packaging). BC also note that there is no understanding of the baseline including current material market or landfill and waste capacity in the area and how this may change accounting for cumulative effects with other projects.	**ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4] [APP-085]** sets out the potential waste streams and estimated total volumes of waste during construction, operation and decommissioning. No soils would be removed the Site, and all aggregate will be recycled on Site unless there is an instance for contaminated soil to be removed. A technical note will be produced and submitted at Deadline 1 to provide further detail on the landfill and waste capacity in the region alongside a review of the cumulative schemes and anticipated waste generation. The Applicant has considered total waste generation and can confirm that vehicle traffic numbers	**Under Discussion**

				including the delivery and collection of waste and recycling skips have been accounted for within the traffic numbers which have been assessed in the traffic and air quality assessments.	

Table 12 – Water Environment, Surface Water, Flooding, Drainage

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
12-1	Section 42 response	Hydraulic modelling	BC agree with the level of surveys and hydraulic modelling that has been undertaken.	Detailed modelling of Claydon Brook presented in **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.2] [PDA-004]** has informed the baseline data. The modelling has been revised to incorporate the 30% climate chance allowance and will be submitted at Deadline 1.	**Agreed**
12-2	Section 42 response	Offsets from watercourses	BC consider that the offsets to Main Rivers Ordinary Watercourses are acceptable.	Perimeter fencing surrounding the Solar PV development will be offset at least 10m either side from all existing ditches and ordinary watercourses, except where access	**Agreed**

				tracks and/or cable routes are required to cross an existing feature. This is in line with the guidance from the Internal Drainage Board and is secured in the **Design Commitments [EN010158/APP/5.9.3]**.	
12-3	Ongoing correspondence	Assessment methodology and conclusions	BC agree with the assessment methodology and conclusions.	The assessment methodology and conclusions are set out in **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2.2]**.	**Agreed**
12-4	Relevant Representation	Groundwater assessment	BC does not support the location of the BESS and considers that further assessment of groundwater levels is required to confirm the suitability of the location.	The location of the BESS is considered appropriate with regards to the potential impacts on groundwater. The Applicant will complete further ground investigation work as secured within **Outline CEMP [EN010158/APP/7.2.2]** (the scope of which will be designed based on the findings of **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2]** and the information from **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4] [APP-125]**,	**Under Discussion**

				and agreed with BC) prior to any works commencing.	
12-5	Relevant Representation	Flood Risk Assessment	BC consider that the flood risk assessment is sufficient.	**ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.2]** [PDA-004] has been updated to incorporate the latest climate change allowances in consultation with the Environment Agency and re-issued to examination on 10 February Mitigation has been carried out in accordance with the requirements of the Environment Agency. The Applicant considers that flood risk to the Proposed Development has been suitably assessed and the proposed surface water drainage strategy has been developed to ensure run off from the Proposed Development does not increase flood risk off site.	**Agreed**
12-6	Relevant Representation	Surface water drainage strategy	BC considers the surface water drainage strategy sufficient	The **Outline Drainage Strategy [EN010158/APP/7.11.2]** provides preliminary calculations for Parcels 1, 2 and 3 based on the guidance provided by the LLFA and IDB and limiting the flow to 4l/s/ha and sizing of attenuation features for the 1%	**Agreed**

				AEP + 25% climate change event. Provision of detailed drainage design including hydraulic modelling of the networks is anticipated at detailed design when development layouts are finalised. The drainage network will be designed to contain the 1 in 30 year event storm and to safely manage exceedance flows for events up to the 1 in 100 year + CC.	
12-7	Relevant Representation	Water Quality	BC (as the LLFA) does not support discharging potentially contaminated runoff from tanks directly into watercourses. They consider that water quality should be managed through SuDS features such as swales, ponds, and bioretention areas. Following further engagement, BC no longer see this as an issue and agree with this matter.	An assessment using the Simple Index Approach in accordance with SuDS Manual Ciria C753 has been undertaken and results for all 3 Parcels are provided in the **Outline Drainage Strategy [EN010158/APP/7.11.2]**. This provided information on the level of treatment provided by the proposed SuDS features. Where required, additional measures were proposed to mitigate pollution risk from the high pollution hazard areas. This is presented in **Section 8: Water Quality** of the **Outline Drainage Strategy [EN010158/APP/7.11.2]** and proposed to be implemented as part of the detail drainage design.	**Agreed**

				Should contaminated water be identified, it would either be appropriately treated and discharged or contained and tankered off site using an appropriate waste carrier. For example, in the unlikely event of a fire at the BESS, retained water would be tested by the Operator. If contaminated (polluted), the water would be removed from site by tanker for treatment at an appropriately licensed offsite facility. If testing confirms that the water is suitable for discharge or reuse, it would be released to the local drainage network under controlled conditions, in consultation with the relevant regulators or reused as a potential source of firefighting water by re-filling the water tanks. This approach ensures that environmental protection is maintained under both normal and emergency conditions.	
12-8	Relevant Representation	Drainage	Comment that two soakaway tests were undertaken (TP002 and TP014) which is insufficient for a site of this scale.	The **Outline Drainage Strategy [EN010158/APP/7.11.2]** demonstrates that a conservative approach has been taken assuming	**Agreed**

		Following further engagement, BC no longer see this as an issue and agree with this matter.	that infiltration is not considered a viable primary surface water disposal method for the proposed development. Patrial infiltration has been assumed for the conveyance SuDS, which is subject to further ground investigation and infiltration potential from underlying geology.	

Table 13 – Traffic and Transport

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
13-1	Section 42 response / ongoing correspondence	Baseline methodology	BC agree with the methodology and approach to establishing baseline traffic conditions (survey locations, report and results).	The methodology is set out 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] [APP-131]**.	**Agreed**
13-2	Section 42 response / ongoing correspondence	Assessment of construction, Impact	BC consider that the assessment should be undertaken at the peak of construction traffic on all routes within the agreed study area.	Agreed and included in the **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport**	**Agreed**

				Assessment [EN010158/APP/6.4] [APP-131].	
13-3	Section 42 response / ongoing correspondence	Traffic Impact	BC consider that the impact of construction traffic does not lead to significant effects and is short term in nature.	Agreed and included in the **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] [APP-131]**.	**Agreed**
13-4	Section 42 response / ongoing correspondence	Mitigation Measures	BC consider that mitigation measures are required to ensure the safe and efficient use of the study area road network for all road users.	Mitigation measures are detailed in **Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5.2]**.	**Agreed**
13-5	Section 42 response / ongoing correspondence	Abnormal Load Access	BC request for access of abnormal loads to be fully considered and assessed.	**ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** contains an AIL Route Survey. The **Outline CTMP [EN010158/APP/7.5.2]** considers abnormal load traffic management measures.	**Agreed**
13-6	Relevant Representation	Access route	BC agrees with the Applicant's proposed access route, but	The support of BC on the access route is noted and agreed. The Applicant will continue to engage with	**Agreed**

			requests that ongoing discussions with HS2 should continue.	HS2 and will use the Stakeholder liaison measures set out in the **Outline CTMP [EN010158/APP/7.5.2]** to ensure that full engagement is undertaken.	
13-7	Relevant Representation	Provision of drawings	BC requests further drawing details relating to the site access junctions.	Full junction drawing details are provided in the **Outline CTMP [EN010158/APP/7.5.2]**. These provide junction layout, road marking, cross section and dimension details and are of a standard accepted for DCO scale projects. Further engagement with BC will be undertaken.	**Under Discussion**
13-8	Relevant Representation	Staff Travel Plan	BC request further information on staff travel and how the mode share targets will be guaranteed.	Staff travel will be controlled by a Staff Travel Plan, as outlined in the **Outline CTMP [EN010158/APP/7.5.2]**. The mode targets in the **Outline CTMP [EN010158/APP/7.5.2]** will be enforced via two regimes. Firstly, the contractor is bound to accept the mode share targets under the contractual arrangements with the Applicant, ensuring compliance, monitoring and the full introduction of the travel plan.	**Under Discussion**

				Secondly, as staff travel is part of the **Outline CTMP [EN010158/APP/7.5.2]**, its implementation under the DCO is a legal requirement, ensuring that the Applicant and their contractor must ensure compliance with staff mode share targets. These two elements ensure full compliance and as such, no further assessment is required.	
13-9	Relevant Representation	Trip generation and traffic impact	BC has requested peak hour traffic flow information, details on how staff mode share will be achieved and enforced and a junction assessment at the A41 / Station Road Junction.	Peak hour flow data can be provided, however the assessment provided is consistent with energy project assessments undertaken for DCO scale projects across the UK and provides sufficient impact details for BC to consider, noting that the traffic impact indicates that there are no significant traffic effects in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** With regards to staff travel mode share, this will be controlled by a Staff Travel Plan, as outlined in the **Outline CTMP [EN010158/APP/7.5.2]**.	**Under Discussion**

The mode targets in the detailed Construction Traffic Management Plan
will be enforced via two regimes. Firstly, the contractor is bound to accept the mode share targets under the contractual arrangements with the Applicant, ensuring compliance, monitoring and the full introduction of the travel plan.

Secondly, as staff travel is part of the detailed Construction Traffic Management Plan, its implementation under the DCO is a legal requirement, ensuring that the Applicant and their contractor must ensure compliance with staff mode share targets.

These two elements ensure full compliance and as such, no further assessment is required.

Junction assessments at the A41 / Station Road junction will be discussed with BC in further detail. The majority of traffic will not be using the junction at network peak hours and as such, the potential for significant effects is considered minor. The construction traffic

effects are also temporary in nature and the assessment provided covers the peak month, which is a defined peak. In these situations, it is not normally a requirement to undertake a junction assessment and engagement with BC on data collection did not require the collection of manually classified turning count information at this junction, required for the undertaking of a LINSIG assessment of the junction.

5. Signatures

This Statement of Common Ground is agreed upon:

On behalf of Buckinghamshire Council
Name:

Signature:

Date:

On behalf of the Applicant
Name:

Signature:

Date:

Rosefield
Solar Farm

rosefieldsolarfarm.co.uk