Rosefield Solar Farm

Draft Statement of Common Ground – Claydons Solar Action Group

EN010158/APP/5.23
April 2026
Deadline 2
Rosefield Energyfarm Limited

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1. Introduction

1.1. Overview

1.1.1. 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").

1.1.2. 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.

1.1.3. 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 Claydons Solar Action Group.

1.2.2. Claydons Solar Action Group ('CSAG') is an incorporated community organisation of residents from villages that would be affected by the Proposed Development.

1.2.3. Collectively, the Applicant and CSAG are referred to as 'the parties'.

1.3. Purpose of this Document

1.3.1. This Statement of Common Ground ('SoCG') is being submitted to the Examining Authority as an agreed draft between both parties. 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].

1.3.3. Paragraph 007 of the DLUHC Guidance comments that:

[1] Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (30 April 2024).

"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 CSAG and the Applicant on matters relating to the DCO 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 CSAG.

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 will be available in the deposit locations and/or the Planning Inspectorate website after submission of the DCO Application.

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 resolved.
	Under Discussion - indicates where points continue to be the subject of on-going discussions between parties.
	Not Agreed - indicates a position where both parties have reached a final position that a matter cannot be agreed 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 **Environmental Statement 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 permanently 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. Following acceptance of the DCO Application, CSAG has appointed technical consultants to support it during the examination of the Proposed Development. Following the publication of the Applicant's Response to Written Representations at Deadline 2, the Applicant will enter detailed discussions with CSAG's technical consultants. Table 1 will be updated to provide a summary of key engagement that has taken place between the Applicant and CSAG in relation to the DCO Application.

Table 1 - Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
29 January 2026	Email	The Applicant and CSAG agree approach to SoCG development and engagement with technical consultants.
30 March 2026	Email	CSAG provides draft SoCG.
April 2026	Email	Various emails to agree SoCG to be submitted at Deadline 2.

4. Current Position

4.1. Position of the Applicant and CSAG

4.1.1. CSAG maintains its formal objection to this development for the reasons set out in its Relevant Representation and Written Representation. Notwithstanding, it is willing to engage on technical matters.

4.1.2. The following tables set out the position of the Applicant and CSAG, including 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. Where discussions are ongoing, the Applicant has included an indication of the likelihood that disagreement will remain by the end of the examination in accordance with the **Rule 6 letter [PD-008].** This will be discussed and agreed with CSAG following Deadline 2.

Table 1 – Site Selection and Consideration of Alternatives

Ref	Description of Matter	CSAG Comment	Applicant's Response	Status
1-1	Adequacy of assessment	The Applicant has failed to demonstrate that there were no other suitable sites available for the proposed scheme.	The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]) presents the reasoning why the Proposed Development is located in the Site's particular location. **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [APP-047] sets out the design evolution process and alternatives that have been considered from the start of the identification of the Order Limits throughout the design development process.	**Not agreed** **Applicant's assessment of likelihood of resolution: Low**
1-2	Mitigation Hierarchy	The first state of the mitigation hierarchy – avoidance – was not applied to the site selection process	The Applicant disagrees with the Claydons Solar Action Group's position. As detailed in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]), the location and design of the Proposed Development is the result of a comprehensive site selection process that considered environmental, technical and planning issues to avoid potential impacts of the Proposed Development. **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [APP-047] sets out the design evolution process and alternatives that have been considered from the start of the identification of the Order Limits throughout the design development process. This process has been undertaken in accordance with the mitigation hierarchy and if development on fields could not be avoided, mitigation measures have been proposed that directly respond to the key constraints in the surrounding area. Detail of this is set out in each technical chapter presented in the ES.	**Not agreed** **Applicant's assessment of likelihood of resolution: Medium**
1-3	Topography	There is no evidence that topography played any part in site selection	The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]) confirms through Section 2 that there is no standard methodology for the site selection of solar farms. Notwithstanding this, the site selection methodology has been informed by guidance set out in section 2.10 of NPS EN-3 (2023) as well as NPS EN-1 (2023), NPS EN-5 (2023), the NPPF (2024), the Vale of Aylesbury Local Plan 2013 – 2033, the NPPG (as relevant) (2024) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Furthermore, Sections 3 and 4 of the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]) specifically reference 'irradiance and site topography' as an influencing factor in the Proposed Development's site selection process.	**Not agreed** **Applicant's assessment of likelihood of resolution: High**
1-4	Statement of Need	The BESS element of the scheme has only Gate 1 status in the connections queue. The Applicant has not demonstrated that BESS forms a necessary part of the scheme: in particular that the Statera scheme which has planning permission could not provide this function.	The Applicant has been informed that the BESS component of the Proposed Development has been re-prioritised with a Gate 1 connection from NESO. This means that the Applicant has an agreement with NESO to connect the BESS, but that the date of this connection has not yet been confirmed and is 'indicative'. The proposed BESS will support the operation of the Proposed Development by increasing its effectiveness, reducing the potential for wasted energy, and maximising a key benefit of the Proposed Development, being the level of carbon free energy sent to the grid, as explained in Section 7.9 of the **Statement of Need [EN010158/APP/5.6]** [APP-036].	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**

Table 2 – Population

Ref	Description of Matter	CSAG Comment	Applicant's Response	Status
2-1	Scope of assessment	The Applicant has failed to carry out any holistic inter-/intra-project assessment of impacts, on residential/local amenity.	Cumulative effects on community access have been assessed within **ES Volume 2 Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**, which notes that residual inter-project cumulative effects are anticipated to be not significant. Landscape and visual effects on users of recreational routes have also been considered within this assessment: Users of the North Buckinghamshire Way/Midshires Way would experience increased significant cumulative effects over the lifetime of the Proposed Development; the PRoW network between Granborough and East Claydon would experience increased significant cumulative effects prior to mitigation planting reducing effects to not significant by year 10 of the Proposed Development.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
2-2	Impacts on local business	Assessment of impacts on the tourism sector as a whole skews conclusions as to significance. There is no assessment of inter-/intra-project impacts on businesses most affected – TCS/Preston Farms, Hogshaw Farm and Wildlife Park, Claydon Park.	An assessment of inter and intra-project cumulative effects has been undertaken and is provided in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].** This chapter provides a detailed cumulative assessment on biodiversity (including habitats and species), Population (including tourism, users of PRoW, local business and residents), Landscape and Visual (impacts to PRoW) and Transport and Access (including consideration of highway users and impacts on traffic). Aside from landscape and visual effects, there are not considered to be any other significant environmental effects from cumulative projects on the tourist economy or its components including Hogshaw Farm & Wildlife Park. As such, it is likely that the cumulative effect on this receptor in terms of its contribution to the tourist economy and its viability as a rural land-based business would be limited to the same scale of effect as for the Proposed Development in isolation, and is not likely to be significant given the limited environmental scope of change, localised and subjective effects, in the context of the substantial and diverse offer of the tourist economy and the viability of individual businesses which is not solely driven by landscape and visual amenity.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
2-3	Local employment	It is not agreed that there would be a net increase in local employment. There is a risk of significant job losses due to impacts on the businesses above.	The Applicant recognises the importance and sensitivity of both TCS Biosciences Ltd and Hogshaw Farm and Wildlife Park but does not agree that as a result of the Proposed Development there would be job losses. The assessment of effects on businesses, including TCS Biosciences Ltd and Hogshaw Farm and Wildlife Park, has been considered within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** drawing on individual topic-specific assessment within the EIA.	**Not agreed** **Applicant's assessment of likelihood of resolution: Medium**
2-4	Accessibility	The likelihood of highway disruption in combination with recent and ongoing development has not been sufficiently addressed.	Effects on community access/walkers, cyclists and horse riders are reported to be slight adverse and not significant during construction (taking account of measures outline within the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5.3]** to limit disruption to users of PRoW and permissive paths) and slight beneficial (not significant) during operation due to SCL/12/2 and SCL/13/2 combining to reduce journey length and increase community accessibility and connectivity between the existing public highway and community areas such as East Claydon, Middle Claydon and Botolph Claydon in the east and Calvert in the west. The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in the **Outline CTMP [EN010158/APP/7.5.3].** The traffic effects of the Proposed Development are temporary and not	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**

			significant. As such, the disruption to the road users is not significant, will not adversely impact emergency service access.	
2-5	Accessibility /Consideration of alternatives	The Applicant has not shown that accessibility formed part of its consideration of alternatives.	The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**) presents the Applicant's due consideration for environmental constraints which during the site selection process, in accordance with sections 2.3 and 2.10 of NPS EN-3 (2023). The Applicant duly considered the following constraints: irradiance and site topography, network connection, proximity of the site(s) to dwellings, agriculture land classification and land type, accessibility, public rights of way, designated international and national ecological and geological sites, nationally Designated Landscapes, flooding, heritage, security and lighting.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
2-6	Elderly and vulnerable residents	Failure to consider impact of traffic disruption on elderly/vulnerable residents' access to healthcare.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The construction traffic effects of the Proposed Development are temporary and not significant in EIA terms. As such, disruption to road users is not significant, will not adversely impact emergency service access nor the ability for residents to access health care.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
2-7	Road safety	Road safety, especially rural lanes, is inadequately addressed in respect of vulnerable road users, including pedestrians, cyclists and equestrians.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in the **Outline CTMP [EN010158/APP/7.5.3].** The traffic effects of the Proposed Development are temporary and not significant.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
2-8	Cumulative effects	Insufficient analysis of cumulative effects with proposed new NG substation.	Cumulative effects (inter-project effects) have been considered in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3],** which concludes that overall, cumulative effects relating to air quality, biodiversity, cultural heritage, land and groundwater, population, noise and vibration, and traffic and access and water would not be significant.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**

Table 3 – Residential Visual Amenity Assessment

Ref	Description of Matter	CSAG Comment	Applicant's Response	Status
3-1	Mitigation	Existing vegetation/ structures are inappropriately relied on/assumed to provide mitigation for the lifetime of the development.	The Applicant reiterates its position that the assessment assumptions with regard to mitigation planting on pages 48-50 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** are realistic and that, as per the assumptions regarding future baseline, it would be difficult to predict the potential failure of some or all mitigation planting. In addition, as set out in the **Outline Landscape Ecological Management Plan (LEMP) [EN010158/APP/7.6.3]**, height and densities of a new tree and hedgerow will be monitored in years 1,2,3,5 and 10 to help ensure they reach the target heights set out in the Environmental Statement. The target height for hedgerows is generally 3- 3.5m for year 10, depending on specific screening requirements, whilst the target height for woodland is at lease 4m by year 10.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
3-2	Assessment methodology	Unclear how screening distances were arrived at.	To reflect the outputs from the initial site visits and residential visual amenity assessments that were undertaken at nearby residential properties, bespoke offsets and screening were provided for each individual property. The methodology for the RVAA is provided in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]**. As per the Landscape Institute's RVAA Technical Guidance Note 2/19, the RVAA initially considers the change in visual amenity as the result of the addition of the Proposed Development to the existing baseline landscape. As per TGN 2/19, it then considers the residual effects following proposed mitigation. These effects are then considered in the round when judging whether the RVAA threshold has been reached. Further detail on the approach to the offsets and landscape mitigation is provided in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]**.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
3-3	Screening distances	Screening distances fail to consider scale of impact – for example where dwellings would overlook more than one element of the scheme	The Applicant disagrees that the extent of screening distances for RVAA receptors is inadequate. As presented on page 9 of the **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** the height parameters of the Proposed Development are noted in the context of other large scale developments with similar profiles; in comparison, the screening distances for the Proposed Development are appropriate. The landscape mitigation planting has been designed to mitigate multiple aspects of the Proposed Development and not one element in isolation. In addition, offsets have been embedded into the design and secured via the **Design Commitments [EN010158/APP/5.9.4]**.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
3-4	Evidence base	RVAA not supported by wire frames/visualisations as recommended in the guidance or ZTV or accurate mapping to illustrate screening distances.	Type 1 visualisations are presented in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-118]** for all assessed RVAA properties.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
3-5	Conclusions	No visual effects experienced by receptors at residential properties would reach the RVAA threshold. This is not agreed. See WR Part 1. REP1-127	The methodology for the RVAA is provided in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]**. As per the Landscape Institute's RVAA Technical Guidance Note 2/19, the RVAA initially considers the change in visual amenity as the result of the addition of the Proposed Development to the existing baseline landscape. As per TGN 2/19, it then considers the residual effects following proposed mitigation. These effects are then considered in the	**Not agreed** **Applicant's assessment of**

			round when judging whether the RVAA threshold has been reached. The Applicant disagrees that greater screening distances would demonstrate effects exceeding the RVAA threshold. A detailed assessment of visual effects on residential receptors/settlements not included in the RVAA is included in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** and none have been assessed as experiencing significant adverse effects.	**likelihood of resolution: Low**
3-6	Threshold of Significance	The threshold of significance for effects on private property is set at demolition or loss of habitability. This is not justified in the assessment and is not reasonable.	The methodology for the Landscape and Visual amenity assessment for residential properties is provided **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** which follows the Landscape Institute's RVAA Technical Guidance Note 2/19. As per the Landscape Institute's RVAA Technical Guidance Note 2/19, the 'Residential Visual Amenity Threshold' is set at whether the Proposed Development would be so 'overbearing' or 'dominating' at any residential property that the resulting visual effect would widely be regarded to render the property an 'unpleasant' or 'unattractive' place to live. The RVAA, seeks to identify where effects on residential visual amenity are of such a nature or magnitude that they may need to be considered in the overall balance of 'residential amenity' or 'living conditions.' The threshold has not been set at demolition or loss of habitability.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
3-7	Cumulative impacts	There is no inter or intra-project assessment of impacts on residential amenity for either the construction or operational phases.	With regard to cumulative visual effects, it is noted in **ES Volume 4, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.4.2] [REP1-074]** that there would be no long-term increased significant effects on properties/settlements outside of the RVAA screening distances; a number of properties to the western extents of Granborough would experience significant effects at Year 1 of the operation (including maintenance) phase as a result of in combination effects with East Claydon BESS, however, these effects would reduce to moderate (not significant) at Year 10 of the operation (including maintenance) phase.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
3-8	Other local businesses	Inadequate assessment of impacts on local businesses, in particular TCS Biosciences/Preston Farms and Hogshaw Wildlife Park.	The Applicant points to their position as set out at RR-049, Impact on local businesses, of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**. In developing the Proposed Development, the Applicant has taken feedback from concerned non-agricultural businesses and has amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential effects on visual amenity, noise and accessibility.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**

Table 4 – Landscape and visual

Ref	Description of Matter	CSAG Comment	Applicant's Response	Status
4-1	Landscape and Visual: Effects	At the majority of the public VPs, along most of the public routes identified, and at some residential properties, visual receptors would experience significant adverse visual effects during construction, operation and decommissioning.	The Applicant notes the agreement with the LVIA's conclusions regarding significant effects.	**Agreed**
4-2	Landscape and Visual: Effects	Effects are assessed on the basis of the proposed change being permanent.	The Applicant is pleased to have reached agreement with the Claydons Solar Action Group on this matter.	**Agreed**
4-3	Landscape and Visual: Effects	Levels of landscape sensitivity have been underestimated.	The Applicant respectfully disagrees that the assessment of landscape sensitivity has been underestimated. As described at reference 8.3 on page 5 above, the Applicant considers the assessment to be robust, legible and consistent and therefore compliant with implementation of best practice methodology with no requirement for reassessment.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
4-4	Landscape and Visual: Effects	Levels of adverse landscape and visual effects, including their extent and duration, have been underestimated, so in some cases fall below the significance threshold.	The Applicant disagrees that the RVAA has underestimated the levels of adverse visual effects having provided a detailed assessment in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** which follows Landscape Institute best practice as described at reference 8.1.22.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
4-5	Landscape and Visual: Effects	Levels of beneficial landscape effects have been overstated.	The Applicant disagrees that describing a moderate effect on landscape fabric as significant lowers the threshold for significance. As clearly set out on page 53 of **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** professional judgement is applied to determine whether all moderate effects are significant or not.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**

4-6	Landscape and Visual: Effects	The proposed development would result in significant adverse effects, including cumulative effects, on recreational amenity.	As the Applicant set out at RR-026, Cumulative effects of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**, the LVIA has concluded that there is potential for an increase in significant landscape effects as a result of combined effects on Landscape Character Area 9.2: Quainton Hill for the duration of operation. As set out in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** there would also be increased combined effects on Landscape Character Area 5.6: Claydon Valley, Landscape Character Area 5.7: Hogshaw Claylands and the Quainton-Wing Hills Area of Attractive Landscape, albeit with no change to overall significance. The Applicant has therefore acknowledged that not all cumulative effects can be mitigated. However, as set out at RR-026, Cumulative effects, of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**, these effects would extend no more than 2km beyond the Order Limits which would not be atypical considering the scale of the Proposed Development.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
4-7	Mitigation	Mitigation is frequently double counted as enhancement.	The assessment of effects in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** does not double-count mitigation measures as potentially off-setting levels of harm. GLVIA3 para.39, as quoted by CSAG, simply clarifies that mitigation measures should be explicitly identified as such, as required by EIA Regulations, and not referred to as enhancements; the latter are optional whereas mitigation is specifically required by the EIA Regulations. The LVIA provides a clear distinction between mitigation measures required to reduce harmful effects and what can be considered as an enhancement.	**Not agreed** **Applicant's assessment of likelihood of resolution: Medium**
4-8	Landscape and Visual: Method	Use of three- and four-point scales.	The methodology for the assessment is clearly set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** and the Applicant maintains that this approach is consistent with best practice guidance as set out in the Guidelines for Landscape and Visual Impact Assessment, Third Edition, and the Technical Guidance Note 02-21 - Assessing Landscape Value Outside National Designations, both published by the Landscape Institute. As has been used in the Applicant's LVIA, these guidance documents confirm that, "*Word scales with ideally three or four but a maximum of five categories, are preferred as the means of summarising judgements for each contributing criteria.*" As identified in the guidance (GLVIA3 para 3.34) it is noted that for a four-point scale: "*Descriptions should be provided for each of the categories to make clear what they mean, as well as clear explanation of which categories are considered to be significant and which are not.*" The key is to provide a clear and consistent approach to identifying which effects are significant or not and it is not necessary to establish a specific threshold of significance at a median point, such as between minor and moderate.	**Not agreed** **Applicant's assessment of likelihood of resolution: High**
4-9	Landscape and Visual: Method	Moderate effects should automatically be categorised as "significant" and professional judgement applied to determine whether a Moderate-Minor effect is significant or not.	As clearly set out on page 53 of **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** professional judgement is applied to determine whether all moderate effects are significant or not.	**Not agreed** **Applicant's assessment of likelihood of resolution: High**

4-10	Landscape and Visual: Method	The terms “industrialisation” and “industrialised” are applicable to the Proposed Development.	The Applicant acknowledges that the Claydons Solar Action Group does not agree with the Applicant’s response to Buckinghamshire Council’s Relevant Representation concerning the industrialising effect of the Proposed Development. However, the Applicant reiterates their position as set out at RR-026, General Comment, of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [PDA-006] which is that while there would be likely significant effects on landscape and visual amenity as presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**, this change would not result in the creation of an industrialised landscape.	**Not agreed** **Applicant’s assessment of likelihood of resolution: Medium**
4-11	Landscape and Visual: Method	By year 10, all the proposed screen planting would have been fully effective, and at that point, in many cases, levels of effects would reduce below the significance threshold. This is not agreed.	Given that the planting of new hedgerow and structural woodland proposed within the Order Limits would far exceed the amount removed during construction, the Applicant disagrees that changes to landscape fabric would result only in a neutral effect.	**Not agreed** **Applicant’s assessment of likelihood of resolution: Medium**

Table 5 – Ecology

Ref	Description of Matter	CSAG Comment	Applicant’s Response	Status
5-1	Habitats Regulations Screening	Screening concludes no likely significant effects on any European Sites.	The Applicant is pleased to have reached agreement with the Claydons Solar Action Group on this matter.	**Agreed**
5-2	Hazel dormouse	Species unlikely to be present at this time. However, for completeness the ES should consider the scope for the species to colonise/re-colonise the area over the operational lifetime of the development.	As detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** no records of hazel dormouse have been identified within 2km of the Order Limits, and there are limited records of their presence in Buckinghamshire. Therefore, hazel dormouse has not been considered within the assessment.	**Under Discussion** **Applicant’s assessment of likelihood of resolution: Low**
5-3	Baseline in respect of black and brown hairstreak and reptiles	The baseline for impact assessment (i.e. combined effect of survey results, local pre-existing data and reasoned suppositions) is broadly adequate in respect of black and brown hairstreak and reptiles.	The Applicant is pleased to have reached agreement with the Claydons Solar Action Group on this matter.	**Agreed**
5-4	Precautionary principle/mitigation hierarchy	The extent to which the precautionary principle and mitigation hierarchy have been duly applied/adhered to, especially as regards impacts on bats, breeding and non-breeding birds and land eligible for SSSI designation is not agreed.	Table 7.6 within the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.6.3]** sets out how the mitigation hierarchy has been applied primarily by avoiding key habitat such as woodland and the majority of hedgerows.	**Not agreed** **Applicant’s assessment of likelihood of resolution:**

				Medium
5-5	Construction compounds	The proposed construction compound in fields B3, B6, B7 and B10 is likely to cause significant disruption to Bechstein's bats and should be relocated.	In order to further the evidence base of how bats, particularly Bechstein's, use the woodland and arable land within and adjacent to the Proposed Development, the Applicant has already undertaken additional studies which were submitted at Deadline 1 (see **Bat Technical Study [EN010158/APP/8.5]** [**REP1-105**]). The Applicant disagrees that a non-precautionary approach has been undertaken. The Proposed Development includes embedded mitigation which resulted in fields being excluded for solar development and increased offsets from field edges to reduce the potential impact on bats. The mitigation has been designed on a landscape-scale ensuring that commuting is protected and foraging is improved compared to the current situation.	**Not agreed** **Applicant's assessment of likelihood of resolution: Low**
5-6	Bats	The surveys and baseline as regards potential impacts on bats, including reliance on scientifically weak assumptions, are inadequate.	As detailed within **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [**PDA-006**], the Applicant considers the ecological survey effort is adequate to inform a complete and detailed assessment that fully considers impacts the ecological receptors as provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**. The full assessment for legally protected and notable species including amphibians, badgers and bats is provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and, where required, mitigation measures are detailed and secured by the **Outline CEMP [EN010158/APP/7.2.3]**, **Outline LEMP [EN010158/APP/7.6.2], Outline Operational Environmental Management Plan (OEMP) [EN010158/APP/7.3.3]** and **Outline Decommissioning Environmental Management Plan (DEMP) [EN010158/APP/7.4.3]**. The mitigation measures proposed to address the impacts of the Proposed Development are robust and sufficient.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
5-7	Bats	The impact assessment conclusions on bats, especially the rare Bechstein's and barbastelle is not robust.	The full assessment for legally protected and notable species including amphibians, badgers and bats is provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and, where required, mitigation measures are detailed and secured by the **Outline CEMP [EN010158/APP/7.2.3]**, **Outline LEMP [EN010158/APP/7.6.2]**, **Outline OEMP [EN010158/APP/7.3.2]** and **Outline DEMP [EN010158/APP/7.4.3]**. The mitigation measures proposed to address the impacts of the Proposed Development are robust and sufficient.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
5-8	Birds	The assessment approach as regards impacts on breeding and non-breeding birds is inadequate.	The Applicant disagrees that the assessment approach is inadequate. The full detailed assessment of the potential impacts wintering and breeding birds is detailed in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**, this assessment was undertaken under the relevant guidance.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
5-9	Birds	The impact assessment conclusions on breeding and non-breeding birds, particularly as regards displacement, is not robust.	The Applicant does not agree that the assessment conclusions are not robust. The assessment of the potential impacts on breeding and non-breeding birds is detailed **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and has been undertaken under the relevant guidance. The survey results have underestimated the number of ground and other nesting birds, instead, the Applicant has based the	**Under Discussion**

			mitigation requirement on the number of birds observed. As presented in the **Outline LEMP [EN010158/APP/7.6.2]** paragraphs 5.5.22 to 4.5.25 it is estimated that there were 67 skylark territories (used as a proxy for all ground nesting species) across the area subject to breeding bird survey (473 ha) but the actual are to be occupied by solar PV is only 279ha and it is estimated that this area supports 37 breeding pairs. Therefore, mitigation is based on the requirement to mitigate for 37 breeding pairs. It is considered that with appropriate management, the carrying capacity of the areas set aside for ground nesting bird mitigation (95ha) would support a greater carrying capacity of nesting pairs than the current arable farmland. Finally, as indicated in the **Outline LEMP [EN010158/APP/7.6.2]** provision of ground nesting habitat is only one of a suite of measures designed to benefit nesting birds which include increasing the availability of insect prey during the summer months as well as provision of a source of winter seed**.**	**Applicant's assessment of likelihood of resolution: Medium**
5-10	Birds	The proposed mitigation and compensation for breeding and non-breeding birds is inadequate.	The full detailed assessment of the potential impacts wintering and breeding birds is detailed in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]**. The Applicant has grouped certain species together such as wintering and breeding species as well as those protected under Schedule 1 of the Wildlife and Countryside Act to understand more fully the predicted impacts. Assessing each species individually would not provide additional clarity as the likely impacts would be similar nor would it change the mitigation proposals. A whole suite of mitigation measures has been proposed including retention of woodland and hedgerow habitat, provision of open ground for ground nesting species, winter seed provision and improving invertebrate biodiversity within fields containing panels. The full suite of mitigation is outlined and secured by the **Outline LEMP [EN010158/APP/7.6.2]** and **Design Commitments [EN010158/APP/5.9.4]**.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
5-11	Other taxa	Surveys and baseline as regards other taxa (e.g. great crested newts) and by extension the impact assessments predicated upon those baselines are inadequate.	Within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** (RR-203 page 216), that Natural England's Wildlife Licensing team have engaged with the Applicant to discuss potential impacts to Great Crested Newts and agreed the survey approach, the mitigation approach and the compensation approaches in principle.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
5-12	BNG	The BNG baseline in light of errors and omissions in habitat mapping, classification and condition assessment are not sufficiently precise.	Comments in relation to UK habitat surveys and other survey coverage is outlined above and detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and the Applicant considers the evidence base sufficiently robust to inform the assessment and that sufficient mitigation is provided to offset the impacts of the Proposed Development. The **Outline LEMP [EN010158/APP/7.6.2]** provides sufficient detail at this stage of habitat management and condition targets to give confidence that the proposed habitat types to be created and enhanced are achievable and management prescriptions are appropriate.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**

5-13	BNG	Claims made in the ES and elsewhere around post-development BNG score and the delivery of net gain are not reliable.	The **Draft Development Consent Order (DCO) [EN010158/APP/3.1.4]** secures, via Requirement 7, a BNG that is significantly in excess of 10% and equates to a secured minimum net gain of 40% for habitats area units, a net gain of 17% for hedgerow units, and a net gain of 10% for watercourse units. Furthermore, it should be noted that BNG is not yet mandatory for NSIP-scale projects and so BNG should be received positively and attract weight, particularly where the uplift is as great as it is in the Proposed Development's case. This is fully in line with local and national policy thresholds.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
5-14	Grazing	The claims made around future grazing extent, stock-type and deliverability and around the types of habitats deliverable in former arable fields under solar arrays lack evidence/veracity.	The Applicant is committed to using grazing management if possible but cannot commit to maintaining current levels of intensive grazing. Grazing levels during the operational phase will be defined in the final LEMP but are likely to be lower than current to ensure the required grassland condition and wildlife benefits are delivered.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
5-15	Mitigation	The Applicant could substantially mollify or even negate many or most of the ecology concerns by means of significant changes to its scheme, including removal of PV arrays from Fields B2-B11, B18-B20 and D28 and D29.	As detailed within **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [PDA-006] (see response to **[RR-026]** at page 21) the Applicant is not intending to remove Solar PV panels from these fields. In addition a detailed response regarding these fields has been given in **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [PDA-006] (see response to **[RR-203]** at page 209 to 214) outlining why the Applicant considers that in the context of the landscape scale mitigation proposed, the placing of solar in these fields is unlikely to cause a significant effect with regards to foraging bats and that overall there will be no net loss of cattle grazed fields. **Statement of Need [EN010158/APP/5.6]** [APP-036] provides further detail on the urgent need for an unprecedented capacity of new low carbon schemes to come forward to support achievement and maintenance of the government's clean power target by and beyond 2030.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Low**

Table 6 – Cultural Heritage

Ref	Description of Matter	CSAG Comment	Applicant's Response	Status
6-1	List of heritage assets	CSAG agrees with the Applicant's list of heritage assets likely to be impacted by the proposals.	The Applicant is pleased to have reached agreement with the Claydons Solar Action Group on this matter.	**Agreed**
6-2	Harm	The scheme will cause less than substantial harm to the listed buildings, registered park and garden, scheduled monuments and conservation areas identified in the Heritage Impact Assessment.	The Applicant is pleased to have reached agreement with the Claydons Solar Action Group on this matter.	**Agreed**
6-3	Levels of Harm	Levels of less than substantial harm are not agreed.	The Applicant has reached agreement with Historic England and National Trust regarding the level of harm to the significance of the assets which they have focused their responses on and has reached agreement with Buckinghamshire Council that the harm to the designated and non-designated heritage assets is less than substantial. These matters of agreement are documented within the **Draft Statement**	**Not agreed** **Applicant's assessment**

			of Common Ground with Historic England [EN010158/APP/5.16.2], **Statement of Common Ground with National Trust [EN010158/APP/5.17.2]** and **Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2]** submitted at Deadline 2.	**of likelihood of resolution: High**
6-4	Archaeology	The scheme will have an impact, but this is due to be mitigated by design or by excavation.	The Applicant is pleased to have reached agreement with the Claydons Solar Action Group on this matter.	**Agreed**
6-5	Claydon Park/Claydon House	Impact on Grade II registered Claydon Park and Grade-1 listed Claydon house is understated.	The Applicant disagrees with this statement. Taking the significance of Claydon Park "in the round" the effect of the impact of the Proposed Development within views to and from the Park would be at the lower end of less than substantial harm. The contribution of the agricultural setting of Claydon Park has been acknowledged within the assessment and throughout the design of the Proposed Development. The Order Limits were pulled back to the south of Calvert Road and Solar PV was removed from Fields SA12, SA134, SA14, SA15, SA26 and SA33 to preserve agricultural land south of Claydon Park and Solar PV was also removed from Field B17 on Knowl Hill to retain the appearance of agricultural land in the wider estate from key views within the park. As noted above, the Applicant has reached agreement with National Trust that the harm to the significance of Claydon as a result of the Proposed Development causing change within its setting will be at the lower end of less than substantial, this agreement is documented within the **Statement of Common Ground with National Trust [EN010158/APP/5.17.2]** submitted at Deadline 2. The Applicant's assessment has followed standard industry practice and relevant guidance on assessing the effects of changes in the setting of heritage assets. Historic England has agreed with the conclusions of the assessment that the harm to the significance of Claydon House Grade I listed building would be at the lower end of less than substantial harm. This agreement is set out within the **Statement of Common Ground with Historic England [EN010158/APP/5.16.2]** submitted at Deadline 2.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
6-6	Claydon House complex	The complex of associated listed buildings within the park is likely to experience greater harm than suggested.	The complex of interconnected listed buildings is recognised within the designations of Claydon Park and Middle Claydon Conservation Area which are both assessed within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]**.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
6-7	Pond Farmhouse	Impact on Grade II-listed Pond Farmhouse, which will be completely surrounded by panels, will be at the higher end of less than substantial, not mid-range.	The Applicant disagrees with this statement. The design of the Proposed Development retains agricultural land to the east and north of Pond Farmhouse by creating offsets from the areas of Solar PV development, this embedded mitigation along with existing woodland to the southeast of the farmhouse will reduce the sense that the farmhouse is encircled by development. The Applicant's assessment recognises that the change to the agricultural character of the building's surroundings will represent "changes to setting of an asset, such that the significance of the asset is compromised" (based on the criteria within Table 9.6 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]**) and as such would be harm within the middle of the scale of less than substantial. Harm towards the upper end of less than substantial harm (as suggested by CSAG) would require "comprehensive change to the setting such that the *significance of the asset* is severely compromised".	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**

			As significance derives not only from setting but from other elements which in the case of Pond Farmhouse will not be altered (such as its inherent architectural and historic interest and its historic relationship with Claydon House and Park), the Applicant considers that the lower magnitude adequately reflects the impact.	

Table 7 – Transport

Ref	Description of Matter	CSAG Comment	Applicant's Response	Status
7-1	Methodology	The methodology in the ES is unclear and appears contradictory, leading to understatement of significance of impacts. For example, *minor rural roads not constructed to accommodate frequent use by HGVs. Includes roads with traffic control signals, waiting and loading restrictions, traffic calming measures"* – indicates a high sensitivity receptor. However, low sensitivity is ascribed to any "*small rural settlement, few community or public facilities or services."*	The methodology used is taken direct from guidance as noted in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]**. The assessment methodology comes directly from The Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement (2023) and the Design Manual for Roads and Bridges LA 104: Environmental assessment and monitoring (2020), published by the Department for Transport (and others). The methodology used is entirely standard and has been used in numerous other DCOs, Section 36, Section 37, etc. applications across the United Kingdom. The assessment has been reviewed and accepted by DCO hearings, public inquiries, stakeholder reviews and other external audits.	**Not agreed** **Applicant's assessment of likelihood of resolution: Medium**
7-2	Methodology	"Magnitude of Effect" is determined according to whether the effects are deemed to be "*material in the decision-making process"* and not in accordance with the range of impacts set out in the assessment. This is inappropriate and misleading.	The Applicant disagrees with this statement. The required guidance has been followed correctly to develop the assessment of effects. The effects and their sensitivity are correctly identified, in line with the required process and guidance.	**Not agreed** **Applicant's assessment of likelihood of resolution: High**
7-3	Methodology	The threshold for a major (adverse) impact due to "Severance, Driver Delay, Non-Motorised User Amenity and Fear & Intimidation" is set at a 90% increase in traffic, but Table 16 does not assess any impact above minor, although there will be traffic increases well above the threshold. (For example a 290% increase for Snake Lane/Fidler's Field).	The assessment has been undertaken in line with the process described in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** The provision of mitigation including **Outline CTMP [EN010158/APP/7.5.3]** and the **Outline RoWAS [EN010158/APP/7.8.3]** addresses the issues noted in the significant effects review and allows these effects to be reconsidered as not significant.	**Not agreed** **Applicant's assessment of likelihood of resolution: High**
7-4	Business impacts	Hogshaw Farm and Wildlife Park and Claydon Park are likely to suffer disruption to its business from road closures and increase traffic but are not identified as receptors.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3]**.The traffic effects of the Proposed Development are	**Under Discussion** **Applicant's assessment**

			temporary and not significant. As such, the disruption to the road users is not significant, will not adversely impact tourist and visitor attractions. For example, no road closures or diversions such as those encountered with HS2 are proposed.	**of likelihood of resolution: Medium**
7-5	Cumulative Impacts	There is inadequate assessment of cumulative highway impacts with other recent, ongoing and proposed development in the area. A review of recent and proposed road closures/restrictions and coordination with other projects is required to inform measures to minimise further disruption.	Cumulative impacts are considered in the assessment provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058], ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] and ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** for all classes of vehicles (Car-/-LGV, HGV and Total Traffic Flows). No significant effects following mitigation are predicted.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
7-6	Road widths	Snake Lane/Fidlers Field, Claydon Road and Quainton Road are not sufficiently wide along their entire length for two HGVs to pass safely without destroying road margins.	Sufficient width is available for passing traffic. This view is shared by Buckinghamshire Council who have expressed no concerns on the principal of access on the proposed roads. Should verge works be required, the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.4]** contains powers to effect such works, if deemed necessary by Buckinghamshire Council.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
7-7	Flood risk	The proposed site entrance on Claydon Road (107130_SK_003) is at the location of well-known but unresolved flooding issues. This needs to be addressed in the Transport Statement/traffic plans.	The detailed design of the access junctions will consider the drainage requirements required for technical approval. Where drainage enhancements are required, these will be provided.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
7-8	Other road users	The Applicant does not appear to have assessed the number of pedestrians, cyclists or equestrians using the proposed construction route.	Non-motorised users have been assessed along with all other road users in the assessment contained within **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]**.	**Under Discussion** **Applicant's assessment of likelihood of resolution:**

				Medium
7-9	CTMP	Highway condition assessment and repairs should be carried out prior to commencement of development, to reduce deterioration and delays in reinstatement.	The **Outline CTMP [EN010158/APP/7.5.3]** includes a Wear & Tear Agreement to protect the condition of public roads used for construction access. The **Outline CTMP [EN010158/APP/7.5.3]** also commits the Applicant to undertaking repairs to Snake Lane/Fidlers Field, should the road be in poor condition at the start of construction works.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
7-10	CTMP	Highways should be restored to good, safe condition following the construction period.	The **Outline CTMP [EN010158/APP/7.5.3]** includes a Wear & Tear Agreement to ensure that the public road condition is guaranteed by the Applicant	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
7-11	CTMP	A clear timetable for highway repair works, prior to and following construction should be provided.	The **Outline CTMP [EN010158/APP/7.5.3]** includes a Wear & Tear Agreement to protect the condition of public roads used for construction access. The **Outline CTMP [EN010158/APP/7.5.3]** also commits the Applicant to undertaking repairs to Snake Lane/Fidlers Field, should the road be in poor condition at the start of construction works.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
7-12	CTMP	Construction period working hours of 7 am to 7 pm would cause excessive construction. Suggest 08:00-18:00 Mon-Fri; 08:00-13:00 Sat; No working on Sunday or Bank Holidays.	Construction phase control mechanisms include normal hours of working and traffic management. These measures are set out in the **Outline CEMP [EN010158/APP/7.2.3]**, and **Outline CTMP [EN010158/APP/7.5.3]**. Both these documents have been informed by the Environmental Impact Assessment ('EIA') and will guide the construction process, through environmental controls, in order to promote good construction practices and avoid adverse or nuisance-causing impacts during the construction phase.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Low**

7-13	CEMP	"Noisier activities (such as piling) would be restricted depending on the construction activity proposed to take place and its proximity to sensitive receptors." This measure requires more detailed parameters/safeguards.	Piling works for the PV frames will be a highly transient activity, with each small pile typically taking less than a minute to install. Given the small scale of the solar piling rig and the low hammer energy, there are not predicted to be any exceedances of the 1 mm/s PPV criterion at the surrounding receptors as a result of the PV piling works. On the basis of the BS 5228-2:2009+A1:2014 Annex E piling calculation, assuming a worst-case kp value of 5 for piles being driven to refusal, a nominal hammer energy value of 1200 joules (MGI Tonker 830 or equivalent), and a pile toe depth of 3m, the 1 mm/s PPV significance criterion has the potential to be exceeded when works are taking place within approximately 50 m of sensitive human receptors. The proposed piling works are not intended within this distance. If ground-borne vibration adversely affects livestock in adjacent fields, alternative rotary bored piling techniques could be adopted in specific locations, depending on the proximity of livestock and time of year. Potential disturbance to livestock would be managed through appropriate consultation with the relevant parties. Where specific concerns are raised, temporary measures would be introduced to reduce the construction induced noise and vibration levels, where appropriate. This is captured within the **Outline CEMP [EN010158/APP/7.2.3].**	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
7-14	Calvert Road/Three Points Lane	It is unclear whether the proposed speed limit on Calvert Road/Three Points Lane indicates this is a proposed access to the site (including for construction). This requires clarification and is not agreed.	Construction traffic only crosses Three Points Lane as illustrated in the access junction drawings provided in the **Outline CTMP [EN010158/APP/7.5.3]**. The speed limit is suggested to ensure the safe operation for all users.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**

Table 8 – Public Rights of Way

Ref	Description of Matter	CSAG Comment	Applicant's Response	Status
8-1	Methodology	The creation of a new permissive path (PP-A1 to PP-A2) along the boundary of field D3 (North) & D3 (South) will enhance the existing connectivity across the PRoW network in this location.	The Applicant is pleased to have reached agreement with the Claydons Solar Action Group on this matter.	**Agreed**
8-2	Methodology	Assessment of impacts on public rights of way lacks inquiry into levels of usage/local value and the impact of loss of views/amenity is consequently under-assessed.	The Applicant disagrees with the comment and maintains that the methodology, as set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4]** [APP-110] and the analysis, as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**, follows best practice as set out in the Guidelines for Landscape and Visual Impact Assessment, Third Edition, published by the Landscape Institute.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**

8-3	Methodology	There is no holistic impact impacts on rights of way users from noise, vibration, disturbance, loss of views, enclosure, during operational or construction periods.	The interaction and combination of different environmental residual (post-additional mitigation effects from the Proposed Developing affecting Public Rights of Way (intra-project effects) has been assessed and is provided in Table 17.4, 17.5 and 17.6 of **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** also provides a summary of all of the likely significant (moderate and above) and minor significance in-combination and cumulative effects reported within the ES, and describes them in terms of their relevance to health in-line with guidance - this includes a consideration of the in-combination effects on Public Rights of Way (PRoW) users.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
8-4	Buckinghamshire Greenway	Part of the proposed Buckinghamshire Greenway intended to provide a continuous walking, wheeling and cycling route across the length of Buckinghamshire passes through the site. This has not been considered.	Discussions have been held between the Applicant and Buckinghamshire Council in relation to the Buckinghamshire Greenway. While the indicative route passes through the Order Limits, the land that the route would cross is within an area only required to be used by the Applicant for cabling and/or construction and maintenance access. This area would be returned to its current use following the completion of the Proposed Development's construction phase. The Applicant is therefore not delivering a new stretch of the Buckinghamshire Greenway as part of the Proposed Development.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
8-5	Assessment of Impacts	It is unclear whether the assessment of impacts is for the whole routes of PRoWs through the site or based on specific locations.	An assessment of PRoWs considering amenity, access and visual amenity is detailed within **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**, **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**, **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** which all consider the public rights of way of the site.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
8-6	BESS impacts	The BESS would have significant adverse noise and visual impacts on nearby public rights of way, especially in accumulation with the approved Statera BESS. Relocation or removal of the BESS should be considered.	Sources of noise and vibration associated with the Proposed Development have been considered and assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** No noise effects are identified as being significant following the adoption of appropriate mitigation measures.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**

Table 9 – Noise and vibration

Ref	Description of Matter	CSAG Comment	Applicant's Response	Status
9-1	Methodology	BS-5228 Category A has been assumed to be applicable which is likely to be appropriate given the largely agricultural nature of the site.	The Applicant is pleased to have reached agreement with the Claydons Solar Action Group on this matter.	**Agreed**
9-2	Methodology	Design Manual for Roads and Bridges, LA 111 Noise and Vibration is used to determine the magnitude of impact based on the change in noise levels caused by construction vehicles using the local road network. This approach is suitable.	The Applicant is pleased to have reached agreement with the Claydons Solar Action Group on this matter.	**Agreed**
9-3	Methodology	Peak particle velocity (PPV) vibration criteria have been taken from BS 5228-2:2009+A1:2014 '*Code of practice for noise and vibration control on construction and open sites. Vibration*' to determine the magnitude of impact for construction vibration. This is suitable.	The Applicant is pleased to have reached agreement with the Claydons Solar Action Group on this matter.	**Agreed**
9-4	Plant noise	The use of the non-specific plant noise data introduces the likelihood that actual construction plant noise levels will vary from that considered and should be further assessed once known.	At this stage, it is appropriate to predict the likely noise levels generated by the construction phase activities so that potentially significant adverse effects can be identified and initial mitigation strategies proposed to control noise levels to an appropriate level. It is agreed that the construction phase assessment and associated mitigation measures would be refined when a Principal Contractor is involved, as part of the CEMP.	**Agreed**
9-5	Piling vibration	There is no assessment of piling vibration impact. If this assessment is to be omitted, robust substantiation should be provided.	Piling works for the Solar PV frames will be a highly transient activity, with each pile typically taking less than a minute to install. Given the small scale of the solar piling rig and the low hammer energy, there are not predicted to be any exceedances of the 1 mm/s peak particle velocity (PPV) criterion at the surrounding receptors as a result of the PV piling works. On the basis of the BS 5228-2:2009+A1:2014 Annex E piling calculation, assuming a worst-case kp value of 5 for piles being driven to refusal, a nominal hammer energy value of 1200 joules (MGI Tonker 830 or equivalent), and a pile toe depth of 3m, the 1 mm/s PPV significance criterion has the potential to be exceeded when works are taking place within approximately 50-m of human receptors. The proposed piling works are not intended within this setback distance. If ground-borne vibration adversely affects livestock in adjacent fields, alternative rotary bored piling techniques could be adopted in specific locations, depending on the proximity of livestock and time of year. Potential disturbance to livestock would be managed through appropriate consultation with the relevant parties. Where specific concerns are raised, temporary measures would be introduced to reduce the construction induced noise and vibration levels, where appropriate. This is captured within the **Outline CEMP [EN010158/APP/7.2.3]**.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**

9-6	Mitigation	*Potential* noise mitigation measures '*may be employed where reasonably practicable'* does not offer sufficient assurance as to the acceptability of impacts.	A range of mitigation measures have been presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-078]** to address potential short-term significant adverse noise effects associated with the construction phase, at a limited number of receptors. The listed measures represent industry best practice and would be refined when a Principal Contractor is involved. At this stage, it is appropriate to identify potential mitigation measures that can be used to control noise levels so that significant adverse effects do not occur, however, the mitigation measures should not be fixed, so that the most effective solution can be adopted on a case-by-case basis.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
9-7	Mitigation	The noise assessment does not qualify which measures are likely to be appropriate for specific construction noise sources and which receptors will benefit.	A range of mitigation measures have been presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** and secured within the **Outline CEMP [EN010158/APP/7.2.3]** to address potential short-term significant adverse noise effects associated with the construction phase, at a limited number of receptors. The listed measures represent industry best practice and would be refined when a Principal Contractor is involved. At this stage, it is appropriate to identify potential mitigation measures that can be used to control noise levels so that significant adverse effects do not occur, however, the mitigation measures should not be fixed, so that the most effective solution can be adopted on a case-by-case basis.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
9-8	Magnitude of impact	BS 4142 suggests that the highest rating noise level for operational noise to be classified as a 'low' magnitude of impact should be equivalent to the existing background level whereas the criteria in Table 3.1 permits a level 5dB above the background level to be classified as 'low', depending on the context. This is not appropriate.	BS 4142 provides three categories when describing potential impacts ("low", "adverse" and "significant adverse"). These are not directly interchangeable with the magnitude criteria within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** ("negligible", "low", "medium", "high"). BS 4142 identifies a potential significant adverse impact where the rating level is around 10dB above the background level, prior to the consideration of context, such as the absolute level of sound. The assessment for the Proposed Development adopts a threshold of >5dB above the background level as potentially significant, prior to the consideration of context. This therefore represents a precautionary approach which provides a greater level of protection to residents.	**Not agreed** **Applicant's assessment of likelihood of resolution: Medium**
9-9	Spectral noise levels	Because there is no comparison of the spectral levels of the proposed noise sources in relation to those of the background noise environment, it is not possible to conclusively state the extent of which the proposed plant will be distinguishable.	Within the scope of BS 4142:2014+A1:2019, rating corrections to account for perceived tones within sources of noise can be applied on a variable scale. This ranges from just perceptible at the receptor, clearly perceptible and highly perceptible. In the case of Proposed Development, where installations are yet to be installed and measured, it is necessary to make a reasonable judgement based on professional experience as to the likelihood that tones or other characteristics will be audible at receptor locations. Based on the acoustic modelling and assessment undertaken, it is considered that should tones from specific items of plant be audible at receptors, these are unlikely to be more than "just perceptible". This is due to the low specific sound level predicted at receptors, which regularly falls below the level of residual sound experienced at receptors (that resulting from existing sources of noise) as presented in **ES Volume 4, Appendix 13.1: Baseline Noise Survey [EN010158/APP/6.4] [APP-127]**.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**

			It is acknowledged that the approach adopted introduces potential uncertainty to the assessment. This uncertainty is managed through the commitment within the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.4]** to achieve defined rating level limits at receptors. Rating levels account for the predicted noise level from the Proposed Development, plus any relevant rating penalties for acoustic characteristics such as tonality. Compliance with the limits will be verified through post-completion monitoring, as secured in the **Outline OEMP [EN010158/APP/7.3.2].** Should it be identified during the detailed design or compliance stages that tonality (or other characteristics) would be more perceptible than expected, the resulting specific sound level from the site would be reduced to account for the higher penalty, such that the total rating limit would be met. As a result, the impact of noise from the development would not be higher than that presented.	
9-10	Building facades	The noise assessment does not comment on reductions afforded by the façade design of existing receptor buildings.	Contextual factors have been accounted for as part of the significance criteria adopted for the noise assessment presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]** [REP1-040]. This includes consideration of low baseline sound levels, the absolute level sound and the receptor facade insulation (open windows). The character and level of the residual sound has been compared to the character and level of the specific sound has been used to inform the application of rating corrections.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
9-11	Underestimation/omission of noise sources	The considered sound data for the battery container and auxiliary transformer may be underestimated and the absence of Inverter / PCS data may be a significant omission considering that this is typically a dominant noise source in BESS compounds.	BESS inverters have been included as part of the operation (including maintenance) phase assessment set out in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]** [REP1-040]. The current design solution that has been used to inform the operation (including maintenance) phase noise assessment incorporates string inverters that are housed within the BESS generic containers, therefore, the noise emissions from BESS units incorporate noise contributions from the inverters. The approach taken by Environoise to derive sound power levels from the proposed equipment, for the purposes of a comparison with other similar developments, is based on an over-simplified assumption that the noise emitting equipment has been modelled as point sources. As noted in Table 13.8 of **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]** [REP1-040], the noise emitting equipment has been modelled as 3D emitting objects, and as such, the resultant sound power levels are higher than the approximated values used by Environoise to inform the comparison. This demonstrates that the adopted values are appropriate.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
9-12	Cumulative impacts with Statera BESS	There is no consideration of cumulative impacts with the Statera Battery Energy Storage System development approved on land immediately adjacent to the north-east edge of the proposed development.	Cumulative noise effects are considered in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**, which includes the Statera Battery Energy Storage System. No exceedance of the LOAEL is predicted considering cumulative developments. No significant noise effects are predicted.	**Under Discussion** **Applicant's assessment of likelihood**

				of resolution: High
9-13	Acoustic barriers	Acoustic barriers of varying heights to the noise generating areas is acceptable mitigation in principle, but the surface mass of the material would need to be sufficient to mitigate the lowest of the frequencies of concern.	As set out in the **Design Commitments [EN010158/APP/5.9.4],** acoustic barriers will be provided around elements of the Independent Outdoor Equipment centralised inverters, transformers and switchgear), ITS (centralised inverters, transformers and switchgear), Rosefield Substation, Main Collector Compound, Satellite Collector Compounds and BESS compound, to ensure that unacceptable noise impacts do not arise. The final design of the acoustic barrier will be confirmed during the detailed design, should the Proposed Development get consented.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
9-14	Evidence to demonstrate LOAEL can be met	A 5dB reduction at source is required for the main transformers through *'refinement of the engineering requirements'*. This approach is vague and indicates that the LOAEL is not met with the current design. The design of the transformer, and other plant, the noise level of which has potentially been underestimated, needs to be developed further before targets can be demonstrated to be met.	The Applicant is satisfied that the lower transformer noise emissions are attainable and therefore appropriate for use in the assessment. A higher noise emission value for the transformers had initially been used to provide flexibility.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
9-15	Failure to demonstrate residual impacts will be low/negligible	The report has not demonstrated that noise from construction plant will achieve a 'negligible' or 'low' impact at all receptors once mitigation measures have been implemented. The assessment demonstrates that without noise mitigation measures, the 'low' magnitude of impact threshold of 65dB LAeq,T will be exceeded by up to 10dB which is a 'medium' impact in accordance with the adopted criteria.	A range of mitigation measures have been presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** to address potential short-term significant adverse noise effects associated with the construction phase, at a limited number of receptors. The listed measures represent industry best practice and would be refined when a Principal Contractor is involved as part of the CEMP. At this stage, it is appropriate to identify potential mitigation measures that can be used to control noise levels so that significant adverse effects do not occur, however, the mitigation measures should not be fixed, so that the most effective solution can be adopted on a case-by-case basis.	**Under Discussion** **Applicant's assessment of likelihood of resolution: Medium**
9-16	Wildlife/livestock	There is no assessment of noise/vibration impacts on wildlife/livestock.	As acknowledged in the Sharps Acoustics document **[REP1-133]**, there are no reliable studies which enable an adverse effect to be linked to a measured level or metric. Given the uncertainty in terms of relevant criteria to be applied for livestock in terms of threshold values, metrics and weighting corrections, communication with Preston Farms–/–TCS Biosciences throughout the works is considered to be the most appropriate solution to minimise potential impacts on their livestock (as recommended by Sharps Acoustics). Within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**, the following commitment was made within the Community Liaison section: *"Community liaison and communication throughout the construction phase would be undertaken to provide information to people residing in properties located in the vicinity of the*	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**

			Order Limits. This typically serves to understand concerns from local residents and enable them to be addressed where feasible, thereby reducing the likelihood of complaints. The community liaison would extend to landowners with livestock or other animals that may be present in fields adjacent to the construction works." As part of Deadline 1, the **Outline CEMP [EN010158/APP/7.2.3]** was updated to include the following commitment in respect of this within Section 2.9. Control of Noise: *"Potential disturbance to livestock would be managed through appropriate consultation with the relevant land interests so that they are aware of the construction works that will be taking place close to particular fields. In addition, the control measures with regards to noise set out in The British Horse Society document 'Advice on Construction sites and horses' would be implemented, where applicable."* In addition, the following statement is included with Section 2.10 of the **Outline CEMP [EN010158/APP/7.2.3]**: *"Potential disturbance to livestock would be managed through appropriate consultation with the relevant parties. Where specific concerns are raised, temporary measures would be introduced to reduce the construction induced noise levels experienced by livestock, where appropriate."* The specific mitigation measures that are implemented will depend on the timing of the works and the location of the livestock at the time. **Appendix 1 - Response to the Written Representation received from TCS Biosciences Ltd and Preston Farms** of the **Applicant's Response to Written Representations [EN010158/APP/8.12]** has been prepared to provide further information regarding the effects of noise and vibration on livestock (horses and sheep). The document presents a summary of available research and guidance on the impacts of noise and vibration on livestock and sets out the mitigation measures proposed to avoid or reduce adverse effects.	

Table 10 – Soils

Ref	Description of Matter	CSAG Comment	Applicant's Response	Status
10-1	BMV land	The soils of the majority of the site are likely to be Grade 3b and not best and most versatile agricultural land.	The Applicant is pleased to have reached agreement with the Claydons Solar Action Group on this matter.	**Agreed**
10-2	Failure to demonstrate there were no available sites with poorer quality land	Buckinghamshire has a very high percentage of non BMV, which is not typical for Southern England. The Applicant has not demonstrated that there were no sites available on poorer quality land.	The Applicant points to NPS EN-1(2023) paragraph 4.3.9 which states that 'this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective'. Moreover, and in a similar sense to paragraph 4.3.9, NPS EN-1 (2023) paragraph 4.3.24 recognises that a proposed project does not have to demonstrate that is it is the best option, but rather that it is acceptable under the provisions of the relevant policy. Therefore, the Applicant disagrees with the statement made. The Applicant has continually sought to minimise the use of Best and Most Versatile (BMV) agricultural land, by focusing the initial site selection exercise on areas identified as provisional Grades 3 and 4 by Defra and Natural England mapping, to the extent that only a very small proportion of BMV is included in the development area. The Proposed Development's Order Limits is concluded to have a BMV take of 1.51% which, in the wider context of solar NSIPs, is exceptionally low.	**Not agreed** **Applicant's assessment of likelihood of resolution: Medium**

10-3	ALC	Agricultural land classification reports indicate that all the farmland affected by this scheme is better and more productive than the Natural England ALC maps of the wider area. This is not reflected in the Applicant's assessments.	The detailed ALC survey set out in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2]** indicates that the land is 0.44% Grade 2, 1.07% Grade 3a, 4.07% non-agricultural and the rest of the site is Grade 3b (non-BMV). These results and further information of the soils found across the Site can be found within **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4] [APP-126].** The results identified within the ALC report are more accurate and detailed than the provisional Natural England ALC maps.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
10-4	No evidence that cattle grazing would be possible	The Applicant suggests that cattle grazing can take place on the site, but there is no information as to how this could be achieved without damage to solar arrays.	Normal agricultural use (e.g. arable and/or grazing as current) would continue in Work Nos 2B, 6, 7 and 10B (**Works Plans [EN010158/APP/2.3.2] [AS-006]**) (all areas outside of main developable Parcels). Within the areas proposed for Solar PV development, grazing some sheep is a viable option that is used on several other solar farms, continuing food production uses. Lower stocking levels would be used than on a sheep farm to ensure that ecological management objectives can be achieved. Cattle grazing is also an option in habitat management areas.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**
10-5	Impacts	It is not agreed that the impact on land/soil ecosystems will be slight adverse/not significant. There will be a significant loss of productive agricultural land.	The Applicant recognises the importance of agricultural use on national food security and confirms low-quality land has been prioritised for the Proposed Development - with 1.51% of the Site considered to be BMV land which, in the wider context of solar NSIPs, is exceptionally low. Food security has been assessed within the **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** and no significant effects have been reported. The utilised agricultural area (UAA) across the UK is 16.8 million hectares in 2024, therefore the total agricultural land take from the Proposed Development accounts for less than 0.004% of the UAA. The total area of land within Buckinghamshire is 187,400, therefore the Proposed Development would occupy 0.66% of the total region. Additionally, there is a potential for livestock grazing during the operation of the Proposed Development therefore continuing food production uses. Upon decommissioning, the soils would be reinstated to their pre-construction condition as secured in the **Outline Soil Management Plan [EN010158/APP/7.7.3]** meaning it would be capable of agricultural production.	**Not agreed** **Applicant's assessment of likelihood of resolution: Medium**
10-6	Post-decommissioning condition	Greater clarification is required that the land can be restored to its pre-development condition.	Upon decommissioning, the soils would be reinstated to their pre-construction condition as secured in the **Outline Soil Management Plan [EN010158/APP/7.7.3]** meaning it would be capable of agricultural production.	**Under Discussion** **Applicant's assessment of likelihood of resolution: High**

10-7	Decommissioning	It is not acceptable to leave cables in the ground following decommissioning, particularly in the light of growing evidence of forever chemical pollution/harms.	The Proposed Development would be decommissioned in accordance with the **Outline DEMP [EN010158/APP/7.4.3]**. As detailed in this Plan, cables buried at least 1m below ground are expected to be left in place, and that approach is based on the Applicant's understanding (informed by use of cabling elsewhere and the approach taken on other similar schemes) that these cables would Rosefield Solar Farm Applicant's Response to Relevant Representations be unlikely to be considered as waste if left in the ground. The approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. However, recognising that industry practice and legislation may change by the time of decommissioning, the Applicant has made clear in the **Outline DEMP [EN010158/APP/7.4.3]** that the approach would be confirmed at the time of decommissioning, based on government policy and best practice.	**Not agreed** **Applicant's assessment of likelihood of resolution: Medium**

Signatures

This Statement of Common Ground is agreed upon:

On behalf of CSAG

Name:

Signature:

Date:

On behalf of the Applicant

Name:

Signature:

Date:

Rosefield
Solar Farm

rosefieldsolarfarm.co.uk

Planning Inspectorate Scheme Ref: EN010158