

Rosefield Solar Farm

Draft Statement of Common Ground –
Buckinghamshire Council
(Tracked~~Clean~~)

EN010158/APP/5.22.54

Revision 54

Deadline 54

Julyne 2026

Rosefield Energyfarm Limited



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1. Introduction

1.1. Overview

- 1.1.1. Buckinghamshire Council maintains its formal objection to this development for the reasons set out in the Relevant Representations and the forthcoming Local Impact Report. Notwithstanding, there is acknowledgment that as Host Authority, the Council must engage on technical matters.
- 1.1.2. This Statement of Common Ground ('SoCG') has been prepared in respect of the application for the proposed Rosefield Solar Farm Development Consent Order ("the Application") made by Rosefield Energyfarm Ltd ("the Applicant") to the Secretary of State for Energy Security and Net Zero under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.3. The Proposed Development is a proposed new solar farm and battery storage facility located in Buckinghamshire. The proposals also include infrastructure to connect the Proposed Development to the National Grid East Claydon Substation, as well as any necessary supporting site infrastructure and environmental mitigation, including landscaping and ecological planting.
- 1.1.4. The SoCG is being submitted to the Examining Authority as an agreed draft between both parties. It will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.
- 1.1.5. The SoCG has been updated at Deadline 3 to reflect the ongoing engagement with the Buckinghamshire Council technical leads, however, this updated version has not yet been fully reviewed by the Council due to time constraints. The Council agreed that this version should be submitted at Deadline 3, and an updated and reviewed version would be submitted at Deadline 4.

1.2. Parties to this Statement of Common Ground

~~4.1.6.~~ 1.2.1. This SoCG has been prepared by the Applicant and Buckinghamshire Council (BC). BC is the host authority for the Proposed Development, as the Order Limits are located entirely within its administrative boundary.

~~4.1.7.~~ 1.2.2. Collectively, the Applicant and BC are referred to as 'the parties'.

~~4.1.8.~~ 1.2.3. The matters of interest discussed with BC are detailed in **Section 4** of this SoCG.

1.2.1.3. Purpose of this Document

~~4.2.1.~~ 1.3.1. This SoCG is a 'live' document and will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.

~~4.2.2.1.3.2.~~ 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').

~~4.2.3.1.3.3.~~ Paragraph 007 of the DLUHC Guidance comments that:

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

~~4.2.4.1.3.4.~~ The aim of this SoCG is, therefore, to provide a clear position of the progress and agreement met or not yet met between BC and the Applicant on matters relating to the Application.

~~4.2.5.1.3.5.~~ The document will be updated as more information becomes available and as a result of ongoing discussions between the Applicant and BC.

~~4.2.6.1.3.6.~~ 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.

~~4.2.7.1.3.7.~~ This SoCG does not seek to replicate information which is available elsewhere within the DCO Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate's website (<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010158/documents>).

~~4.2.8.1.3.8.~~ 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.

~~4.3.1.4.~~ Terminology

~~4.3.1.1.4.1.~~ 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 **ES Volume 3, Background and Context Figures 1.1 - 1.2 [EN010158/APP/6.3] [APP-061]** and described in **ES Volume 1, Chapter 2: Location of the Proposed Development [EN010158/APP/6.1] [APP-045]**, with the consideration of alternatives and the evolution of the design of the Proposed Development presented in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**.
- 2.1.4. The principal components of the Proposed Development include:
- Solar PV development consisting of:
 - Ground mounted Solar PV generating station. The generating station would include Solar PV modules and mounting structures; and
 - Balance of Solar System (BoSS) which comprises: Inverters; Transformers; Switchgear; Combiner Boxes; acoustic barriers and cabling.
 - A project substation (the 'Rosefield Substation') compound comprising: Transformers; Switchgear; reactive power compensation bays; disconnectors; circuit breakers; busbars; control equipment; lightning surge arrestors; building(s) including office, control, functions, material storage, material laydown areas and welfare facilities; firewalls; fencing and acoustic barriers; a security cabin; parking as well as wider monitoring, maintenance and emergency equipment;
 - A Main Collector Compound and two Satellite Collector Compounds comprising: Switchgear; Transformers; ancillary equipment; operation and

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

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

3. Record of Engagement

3.1. Record of Engagement

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

Table 1 - Record of Engagement

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

30 May 2024	Transport	Teams meeting	Agreed access route assessed
10 June 2024	Noise and Vibration	Email Correspondence	The baseline survey results, including statistical analysis of background sound levels, were fully included and reflected BC's feedback
12 June 2024	Landscape and Visual	Email Correspondence	Request for the experience of users on cycle route No. 51 to be considered. Experience of users of cycle route No. 51 has been considered in the assessment
12 June 2024	Landscape and Visual	Email Correspondence	Request for additional views to be considered for HS2 close to Viewpoint 4
12 June 2024	Landscape and Visual	Email Correspondence	Request for the consideration of the screening effect of hedgerows throughout the duration of the Proposed Development. The assessment includes effects as a result of plant growth rates and management strategy
12 June 2024	Landscape and Visual	Email Correspondence	Request for winter views to demonstrate a worst-case scenario for the photomontages. Winter photography has been used as the basis for all photomontages
12 June 2024	Landscape and Visual	Email Correspondence	Request for further viewpoints within the Proposed Development and for consideration towards the experience of horse riders on bridleways
26 June 2024	Cultural Heritage	Teams meeting	Discussion around emerging geophysical results and approach to trial trenching
3 July 2024 (and recurring monthly)	Planning	Teams Meeting	Monthly online meetings to provide BC's Planning Officer with regular updates
07 August 2024	Biodiversity	Email Correspondence	Council contact to discuss proposed survey works for protected species

06 September 2024	Cultural Heritage	Email Correspondence	Update on geophysical survey results. Suggested trial trenching strategy shared
09 September 2024	Biodiversity	Teams Meeting	Design principles presented and secured
26 September 2024	Water	Teams Meeting	Meeting with the Lead Local Flood Authority to discuss principles of the development and implementation of SuDs and the drainage hierarchy
26 September 2024	Cultural Heritage	Email Correspondence	Discussions on scope of pre-determination trial trenching
02 October 2024	Landscape and Visual	Email Correspondence	Itinerary of the proposed site visit shared with BC
09 November 2024	Noise and Vibration	Email Correspondence	Agreed methodology for survey was undertaken
25 November 2024	Land and Groundwater	Email Correspondence	BC agreed that sufficient information in the PEIR justified scoping geological hazards out for assessment in the ES
25 November 2024	Land and Groundwater	Email Correspondence	Revised ES assessment methodology issued following comments on the PEIR. Agreement that methodology was acceptable was received from BC on 21 March 2025
10 December 2024	Cultural Heritage	Email Correspondence	Trench plan agreed and draft Written Scheme of Investigation issued for comment
08 January 2025	Cultural Heritage	Email Correspondence	Written Scheme of Investigation for the Trial Trenching agreed
10 January 2025	Cultural Heritage	Email (archaeological advisor – jointly)	Updates were made to the archaeological trial trenching written scheme of investigation and issued to the archaeological advisor for comment

		with Historic England)	
15 January 2025	Land and Groundwater	Teams Meeting	Agreed a mineral safeguarding assessment would be provided in advance of the DCO Application to determine whether mineral resources could be scoped out of the ES
16 January 2025	Cultural Heritage	Email (archaeological advisor – jointly with Historic England)	Archaeological trial trenching written scheme of investigation finalised and approved
11 February 2025	Landscape and Visual	Site walkover	Site meeting with BC to review the viewpoints, offsets and proposed footpath diversions
19 February 2025	Water	Teams Meeting	Meeting with the Lead Local Flood Authority to review comments in the Preliminary Environmental Information Report
26 February 2025	Landscape and Visual	Site walkover	Site meeting with BC to review proposed PRoW diversions and permissive routes and clarifications of High Speed 2 (HS2) changes
14 March 2025	Land and Groundwater	Email Correspondence	Mineral Safeguarding Assessment was issued and comments provided on the proposed structure of the assessment
2 April 2025	Arboriculture	Email Correspondence	Email sets out the BC's comments on arboricultural matters and the Applicant's response to these comments with a request for further discussion
11 April 2025	Climate	Teams Meeting	Discussion related to the assessment methodology, baseline and mitigation measures. The Applicant has included an assessment of greenhouse gas emissions including a comparison with UK carbon budgets and grid carbon intensity, with expanded and specific mitigation measures and contextual methodology explanations

15 April 2025	Biodiversity	Teams Meeting	Update on the design, mitigation, surveys and enhancement proposals. Queries raised have been addressed in the Outline Landscape and Ecological Management Plan, Biodiversity Net Gain Assessment, and Bat Preliminary Roost Assessment
16 April 2025	Population	Email Correspondence	Agreed the Population Assessment in the ES would exclude health and wellbeing effects
30 April 2025	Water	Teams meeting	Agreed methodology included in Outline Drainage Strategy
12 May 2025	Cultural Heritage	Teams Meeting	Review of trial trenching results and discussion of archaeological management strategy for post-DCO submission
13 May 2025	Arboriculture	Email Correspondence	BC provided a contact for their Arboricultural lead
13 May 2025	Water	Teams meeting	Discussion on the draft drainage strategy for the Proposed Development
06 June 2025	Cumulative Effects	Email Correspondence	Shortlist agreed, request that Longbreach Solar Farm be included
12 August 2025	Cultural Heritage	Email (built heritage advisor)	Discussion of built heritage assets to be scoped into the detailed setting assessment in the ES
13 August 2025	Cultural Heritage	Email (built heritage advisor)	Confirmed that as Shepherd's Furze (NHLE 1214845) listed building had been demolished (with consent) in advance of HS2 and that it could be de-scoped from the assessment
14 August 2025	Cultural Heritage	Email (archaeological advisor)	List of archaeological assets proposed to be scoped into the ES was sent to the archaeological advisor

21 August 2025	Cultural Heritage	Email (archaeological advisor)	Archaeological advisor requested that the nearby scheduled moated site be included in the setting assessment
22 August 2025	Cultural Heritage	Email (archaeological advisor)	Archaeological advisor provided comments on draft archaeological management strategy (AMS). AMS updated
28 August 2025	Cultural Heritage	Email (archaeological advisor)	Archaeological advisor reiterated the request for 4% trenching of hard infrastructure and geophysical anomalies and 2% of remainder of development area to be undertaken pre-construction and form part of the AMS
09 September 2025	Land and Groundwater	Email Correspondence	BC confirmed that it agrees that an assessment of mineral extraction and mineral safeguarding can be scoped out of the ES
12 September 2025	Cultural Heritage	Email (archaeological advisor)	Confirmed that the WWII ammunition dump could be scoped out of the ES
18 September	Arboriculture	Email Correspondence	Arboriculturist lead from BC provided a response with a provisional date for a call to discuss the BC's comments
23 September 2025	Cultural Heritage	Email (built heritage advisor)	Confirmed that East Claydon is not designated as a conservation area but that the group of listed and non-designated assets should be considered within the ES
28 November 2025	Cultural Heritage	Teams meeting (BC archaeological advisor jointly with The National Trust and Historic England)	BC Archaeological Advisor confirmed that their relevant representation had been submitted requesting amendments to the Archaeological Management Strategy

13 January 2026	Biodiversity	Teams meeting	Discussed the Relevant Representation received from BC and the Applicants initial response and amendments to documents that will be made at Deadline 1
15 January 2026	Population	Teams meeting	Discussed the Relevant Representation received from BC and the Applicants initial response and amendments to documents that will be made at Deadline 1
5 February 2026	Cultural Heritage	Teams meeting	Discussed the Relevant Representation received from BC and the Applicants initial response and amendments to documents that will be made at Deadline 1
9 February 2026	Arboriculture	Teams meeting	Discussed the Relevant Representation received from BC and the Applicants initial response and amendments to documents that will be made at Deadline 1
13 February 2026	Flood Risk and Drainage	Teams meeting	Discussed the Relevant Representation received from BC and the Applicants initial response and amendments to documents that will be made at Deadline 1
4 March 2026	Land and Groundwater	Teams meeting	Discussed the matters detailed within this Statement of Common Ground and amendments to documents that will be made at Deadline 1.
26 March	Land and Groundwater	Teams meeting	Discussed remaining matters under discussion within this Statement of Common Ground.
30 March 2026	Cultural Heritage	Teams meeting	Discussed the matters detailed within this Statement of Common Ground and response to LIR
1 April 2026	Waste	Teams meeting	Discussed comments raised by BC in their LIR and amendments to documents that will be made at Deadline 2.

8 April 2026	Biodiversity	Teams meeting	Discussed comments raised by BC in their LIR and remaining matters under discussion within this Statement of Common Ground.
10 April 2026	Cultural Heritage	Teams meeting	Discussed remaining matters under discussion within this Statement of Common Ground.
15 April 2026	Soil	Teams meeting	Discussed comments received in the LIR and remaining matters under discussion within this Statement of Common Ground.
17 April 2026	Biodiversity	Teams meeting	Discussed comments received in the LIR and remaining matters under discussion within this Statement of Common Ground.
5 May 2026	Public Rights of Way	Teams meeting	Discussed comments received in the LIR and remaining matters under discussion within this Statement of Common Ground.
11 May 2026	Noise	Teams meeting	Discussed comments received in the LIR and remaining matters under discussion within this Statement of Common Ground.
4 June 2026	Biodiversity	Teams meeting	Discussed comments received at Deadline 3 from BC related to the BNG Assessment and the Applicants proposed approach to address their comments.
5 June 2026	Arboriculture	Teams meeting	Discussed comments received in the response to Deadline 3 and remaining matters under discussion within this Statement of Common Ground.
5 June 2026	Built Heritage	Teams meeting	Discussed built heritage assets and the Council's position on the level of harm. In addition, mitigation was discussed as a result of the request from the ExA in the Issue Specific Hearing 1.
11 June 2026	Landscape and Visual	Teams meeting	Discussed comments received in the response to Deadline 3 and remaining

matters under discussion within this Statement of Common Ground.

12 June 2026	Built Heritage	Teams meeting	Discussed responses to Deadline 3 submissions, interpretation measures and mitigation.
17 June 2026	Built Heritage	Emails	Agreed that assessment of Bernwood Farm could be included within the update to Annex D of Appendix 9.1 as effects are not significant.
18 June 2026	Transport	Teams Meeting	Agreed additional test to the oCTMP and confirmed that there were no further transport matters outstanding.
18 June 2026	Soils	Teams Meeting	Discuss outstanding matters within the Statement of Common Ground and responses to Deadline 3 submission.
<u>10 July 2026</u>	<u>Built Heritage</u>	<u>Teams Meeting</u>	<u>Discuss outstanding matters within the Statement of Common Ground and BC's response to the Applicant's Deadline 4 submission.</u>
<u>21 July 2026</u>	<u>Soils</u>	<u>Teams Meeting</u>	<u>Discuss outstanding matters within the Statement of Common Ground and responses to BC's Deadline 4 submission.</u>

4. Current Position

4.1. Position of the Applicant and Buckinghamshire Council

- 4.1.1. Buckinghamshire Council maintains its formal objection to this development for the reasons set out in the Relevant Representations and the forthcoming Local Impact Report. Notwithstanding, there is acknowledgment that as Host Authority, the Council must engage on technical matters.
- 4.1.2. The following tables set out the position of the Applicant and BC on technical matters, following a series of meetings and discussions with respect to the key areas of the Proposed Development. This includes matters where discussions are ongoing.
- 4.1.3. As noted above, this is a 'live' document, and some aspects have yet to be agreed upon between both parties. The intention is to provide a final position in subsequent versions of the SoCG, addressing and identifying where changes have been made, and ultimately, documenting agreement by both parties on relevant points.
- 4.1.4. Where discussions are ongoing, the parties have included an indication of the likelihood that disagreement will remain by the end of the examination in accordance with the **Rule 6 letter** [\[PD-008\]](#).

Table 1 - Air Quality

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

there may be a requirement to update the air quality assessment.

Assessment (**ES Volume 4, Appendix 6.1: Air Quality Assessment [EN010158/APP/6.4] [APP-086]**) are the same.

Table 2 – Biodiversity

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
2-1	Section 42 response / ongoing correspondence	Survey effort and assessment approach	BC agree with the precautionary approach to the survey efforts and assessment and consider that there is appropriate mitigation measures secured for the following species and habitats: - Great Crested Newt - Badger - Invertebrates ((lepidoptera, glow worm, aquatic invertebrates, black and brown hairstreak butterfly eggs) - Reptiles - Breeding Birds - Wintering Birds - Arable Plants	ES Volume 4, Appendix 7.5: Great Crested Newt Habitat Suitability Index and Environmental DNA Report (2023) [EN010158/APP/6.4] [APP-091], Appendix 7.6: Badger Survey Report (2022) (Confidential) [EN010158/APP/6.4] [APP-092] and Appendix 7.15: Badger Survey Report (2025) (Confidential) [EN010158/APP/6.4] [APP-101] set out the survey findings.	Agreed

			- Otter and Water Vole - Trees (Arboriculture)		
2-2	Section 42 response / ongoing correspondence / Relevant Representation	Survey and Assessment Methodology	BC do not agree with the survey and assessment methodology for the following species and habitats: - Bats	The Applicant does not consider that further surveys and/or data are required. Full explanatory commentary is set out in Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029] and the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] with the full assessment provided within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2].	Under Discussion Medium
2-3	Section 42 response / Relevant Representation	Embedded mitigation	BC do not agree with the use of buffers which do not accord with the minimum specifications set out within local policy.	The Applicant disagrees that buffers are generic. Bespoke offsets have been incorporated into the design of the Proposed Development which have been informed by both the results of surveys and through consultation with stakeholders. Full explanatory commentary is set out in Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029] and the Applicant's Response to Relevant Representations	Under Discussion Medium

2-4	Section 42 response / Relevant Representation/ LIR	Offset to ancient woodland	BC consider the buffer from ancient woodland should be at least 50m, in accordance with VALP Policy NE8.	[EN010158/APP/8.3] [PDA-006] and ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]. A minimum 30m buffer zone is proposed around ancient woodland to prevent root damage and support habitat creation, exceeding the standard 15m guidance from Natural England and the Forestry Commission. These buffers will enhance ecological connectivity between the site, nearby SSSIs, and ancient woodland, benefiting local wildlife such as bats. Additionally, a 10m buffer is now applied to ditches, aligning with original watercourse proposals. Full explanatory commentary is set out in Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029] and the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] and ES	Not Agreed
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Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2].				
2-5	Section 42 response / Relevant Representatio n	Black Poplar	BC consider that an offset should be provided commensurate with their height plus 15m. BC request that there should be genetic testing for black poplar.	The group of trees with potential to be black poplar is entirely unaffected by the Proposed Development. A substantial buffer has been maintained around these trees, extending well beyond their calculated root protection areas, ensuring these trees are fully protected throughout the works as detailed in ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4] [APP-099].
				Agreed

2-6	Section 42 response	Bats	BC do not agree with the extent of solar panels as they consider that it is likely to cause harm to bats due to changes to the habitat management and reduction of foraging resources in key areas. BC request that panels and/or infrastructure is removed from fields B6,B7,B10 and B11 and fields D28 and D29.	Full explanatory commentary is set out in Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029], the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] and ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]. The Applicant provided further detail on the change of habitat management and grazing on bats within the Bat Technical Study [EN010158/APP/8.5] that was issued at Deadline 1. The Applicant will continue to discuss this matter with Buckinghamshire Council.	Under Discussion High
2-7	Section 42 response	Management Plans	Request that individual management plans for all veteran and ancient trees as well as non-ancient woodland and trees with potential to become veteran and ancient trees (inc. those within the hedgerows).	The Applicant does not consider that individual management plans are necessary as no woodland habitat including ancient woodland, veteran or ancient trees would be removed, with mitigation measures to protect woodland and trees detailed and secured in the Outline LEMP [EN010158/APP/7.6.2].	Agreed

2-8	Section 42 response	Ancient Woodland and Veteran Trees	BC consider that the proposed PRoW diversions should be avoided due to intensification of usage within the buffer zone and increased vulnerability of the woodland.	As detailed in ES Volume 2: Chapter 7: Biodiversity [EN010158/APP/6.2.2], following the application of additional mitigation measures, no direct adverse impacts are predicted on ancient woodlands within and adjacent to the Order Limits through the lifetime of the Proposed Development. Proposed PRoW diversions and new permissive routes in Parcel 1 would be unsurfaced tracks to avoid any physical impacts on the Root Protection Area. The new permissive path route would be 14.5m to the south of Shrubs Wood at the closest point and the closest diverted PRoW (Ref. SCL/13/1) would be 10m to the west of Shrubs Wood. It has been assessed that the PRoW diversions and permissive footpaths would not result in direct or indirect impacts to ancient woodland sites.	Agreed
2-9	Relevant Representation / LIR	Proposed Bat Monitoring	BC do not agree with the proposed bat monitoring and expect that it should include the monitoring of temporary flight lines.	The Outline LEMP [EN010158/APP/7.6.2] outlines that monitoring of bat activity would be undertaken during the operation (including maintenance) phase to	Under Discussion Medium

confirm the expected effectiveness of the embedded mitigation and the effect of the Solar PV modules and associated infrastructure on bats.

Further detail on the bat monitoring strategy and objectives have been added into the **Outline LEMP [EN010158/APP/7.6.5]** at Deadline 4.

The strategy will be developed in line with CIEEM's Bat Mitigation Guidelines (Chapter 9) to monitor the effectiveness of the mitigation proposed in relation to bats. Specific objectives will be set and tested, and remedial actions proposed where objectives are not met. Full explanatory commentary is set out in **Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029]** and the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** and **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]**.

2-10	Relevant Representation	Biodiversity Net Gain	BC consider that the BNG requirements have been met.	This is set out in ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] .	Agreed
2-11	Relevant Representation	DCO Requirement	BC consider that the DCO should require a detailed Arboricultural Method Statement and Tree Protection Plan to be approved and implemented prior to the commencement of any works (including preliminary works) which could affect trees, hedgerows or woodland.	The Outline Construction Environmental Management Plan (CEMP) [EN010158/APP/7.2.2] secures the need for a site specific Arboricultural Method Statement ('AMS') and Tree Protection Plan (TPP) to be produced which will detail the exact location and nature of protective fencing, tree pruning, signage, methods of work and protection measures. The commitments in the Outline CEMP [EN010158/APP/7.2.2] are secured via Requirement 11 of the Draft Development Consent Order [EN010158/APP/3.1.3] . Prior to commencement of construction, the Applicant will submit the detailed Construction Environmental Management Plan to BC for approval to discharge this requirement, which will include further detail on the AMS and TPP.	Agreed

2-12	Relevant Representatio n	Arboricultura l impacts with HS2	BC notes that the Order Limits of the Proposed Development overlap with the HS2 Act land limits and would place panels in areas designated or already planted woodland by HS2. This would reduce the buffer next to Decoypond Wood Ancient Woodland and limit a key bat commuting route. This could harm both the integrity of the ancient woodland and the effectiveness of the ecological network planned as part of HS2.	The Applicant is aware that some parcels of the land within the Order Limits are covered by The Secretary of State for Transport's HS2 Safeguarding Directions made under articles 18(4), 31(1) and 34(8) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. HS2's requirement for this land is for the purposes of mitigation. This land is also the subject of a private agreement between the Claydon Estate, The Department for Transport and HS2 regarding the effect of the Direction. The Proposed Development does not impact any HS2 mitigation planting due to the agreement reached with the Claydon Estate, which switches out areas of mitigation planting within the safeguarded land for replacement land which is not impacted by the Proposed Development. The Applicant has email confirmation from HS2 that this is the case and is in the process of consulting with High Speed Two (HS2) Limited to obtain a formal letter of confirmation which we	Agreed
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				plan to submit to the Examining Authority, once available. The Applicant is aware of the importance of the areas around Decoypond Wood to bats and has protected commuting routes through appropriate buffers as set out and secured by the Outline LEMP [EN010158/APP/7.6.5] submitted at Deadline 4.	
2-13	LIR	Hedgerow removal	BC are concerned that there would be fragmentation of ecological networks in the Bernwood Opportunity Area due to the loss of approx. 2,060m of hedgerow	The Applicant acknowledges limited arboricultural impacts from the Proposed Development, mainly involving small sections of hedgerows and a limited number of trees, with no loss of veteran trees or ancient woodland. Most linear features will be retained, preserving landscape character. The ecological and historical importance of the hedgerow network is recognised, and losses are minimised. Replacement and new hedgerow planting will result in a net increase in hedgerows across the site, improving ecological connectivity. While new planting will take time to establish, this does not represent permanent loss, and	Under Discussion Medium

				interim measures will maintain landscape connectivity until hedgerows are fully established	
2-14	LIR	Ground nesting bird mitigation	BC have concerns on the topography of mitigation land and potential conflicting management requirements for bats and birds, particularly in areas where cattle grazing is proposed to support bat mitigation.	As presented in the Outline LEMP [EN010158/APP/7.6.3] at paragraphs 4.5.22 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 surveys (473ha). However, since breeding bird surveys were undertaken, the design of the Proposed Development has reduced substantially so that the actual area where ground nesting birds may be displaced by solar PV panels is only 279ha and it is estimated that this area supports 39 breeding pairs. Therefore, mitigation is based on the appropriate and proportionate requirement to mitigate for 39 breeding pairs. It is considered that with appropriate management the carrying capacity of the areas set aside for ground nesting bird mitigation (95ha) all of which is within the order limits would support a greater carrying capacity of nesting pairs than the current arable	Under Discussion Medium

farmland. Finally, as indicated in the **Outline LEMP** [EN010158/APP/7.6.5] 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. The **Applicant's Response to Relevant Representations** [EN010158/APP/8.3] [PDA-006] (see response to [RR-020] at page 288) indicates that with appropriate management solar farms can continue to support a diverse range of breeding bird species. Breeding bird surveys have been undertaken over two years within the Solar PV panel areas, covering a substantial area. As the cable route and other areas support the same habitats, the Applicant is confident this survey data can reliably predict breeding bird use, including by ground-nesting species. Cabling works are temporary, with land reinstated to agricultural use, so no significant effects on breeding birds are anticipated. The **Outline LEMP**

[EN010158/APP/7.6.5] commits to carrying out works outside the breeding season where possible, or undertaking nesting bird checks to ensure legal compliance. Additional mitigation and monitoring measures to support ground-nesting birds are secured through the **Outline LEMP [EN010158/APP/7.6.5]** and Requirement 7 of the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.7]**. The Applicant provided a detailed response in relation to the adequacy of the location of ground nesting bird mitigation within the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [REP3-049]**.

Table 3 – Climate

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

Table 4 – Cultural Heritage

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
4-1a	Section 42 Response / Email correspondence / Relevant Representation / LIR	Assessment methodology including how the contribution of setting to significance has been identified	BC do not agree with the way the cultural heritage methodology has been followed and consider that the assessments of setting do not adequately consider the contribution of setting to significance and thus the effects of changes to the setting of the designated heritage assets. <u>The assets scoped in for detailed assessment are agreed. BC agree that Bernwood House can be scoped out of the ES Chapter as the effects will not be significant.</u> BC consider that the contribution to significance should be assessed in more detail including how different views including two way views, views that	ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052] includes all the assets that have been requested to be scoped in and sets out the assessment methodology which follows industry standards and guidance, and conclusions. ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment, Annex C and Annex D [EN010158/APP/6.4] [APP-106] has considered the contribution made by setting to the significance of heritage assets in turn, including the contribution made by designed views. Detailed assessment has been provided for those assets expected to experience significant effects. This has included consideration of any designed views, particularly with	Not Agreed Under Discussion High

			take in both the receptor and scheme, parkland views and views and relationships that historically relate to heritage sites and contribute to their significance.	reference to Claydon House. The list of assets scoped into the assessment has been agreed with Historic England through ongoing engagement as set out in the Draft SoCG with Historic England [EN010158/APP/5.16]. The Applicant welcomes this agreement	
<u>4-1b</u>	<u>Section 42 Response / Email correspondence / Relevant Representation / LIR</u>	<u>Assessment methodology including how the contribution of setting to significance has been identified</u>	<u>BC consider that the Applicant's detailed setting assessment gives insufficient weight to the contribution that setting makes to the significance of the heritage assets and this leads to under consideration of the level of harm and the significance of effects.</u>	<u>ES Volume 2, Chapter 9: Cultural Heritage</u> [EN010158/APP/6.2.4] includes all the assets that have been requested to be scoped in and sets out the assessment methodology which follows industry standards and guidance. <u>ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment, Annex C and Annex D</u> [EN010158/APP/6.4.4] has considered the contribution made by setting to the significance of heritage assets in turn, including the contribution	<u>Not Agreed</u>

				<u>made by designed views. Detailed assessment has been provided for those assets expected to experience significant effects. This has included consideration of any designed views, particularly with reference to Claydon House.</u>	
4-2	Section 42 response / ongoing correspondence	Trial Trenching	BC agree with the trial trenching survey scope and methodology.	The Applicant undertook pre-determination archaeological investigations in consultation with the host authority at a 4% sample rate of the targeted areas. Results of these surveys and how this has informed the design of the Proposed Development (including approach to mitigation) is included within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.41] [APP-052], ES Volume 4, Appendix 9.2: Geophysical Survey Report [EN010158/APP/6.4.2] and Appendix 9.3: Archaeological Trial Trenching Report	Agreed

				[EN010158/APP/6.4] [APP-108].	
4-3	Section 42 response	Written Scheme of Investigation	BC request that a detailed Written Scheme of Investigation submitted to detail an appropriate evaluation and mitigation strategy prior to construction and decommissioning works.	The Draft Archaeological Management Strategy [EN010158/APP/7.10.2] includes provision for detailed Written Scheme(s) of Investigation for further evaluation and archaeological mitigation to be agreed with BC prior to construction works commencing. Potential impacts to archaeological remains during operation (including maintenance) and decommissioning works are considered within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.41] [APP-052].	Agreed
4-4a	Section 42 response / ongoing engagement	Bernwood Farm	BC consider that the harm to the significance of Bernwood Farm through changes in its setting would be at the higher end of less than substantial harm. As a low importance asset this	The Applicant has included a detailed setting assessment <u>assessment</u> of Bernwood Farmhouse within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment	Not Agreed Under Discussion

~~harm would not result in a significant effect.~~

[EN010158/APP/6.4.43]
submitted at Deadline 4. The Applicant considers that there would be less than substantial harm within the middle of this scale to Bernwood Farmhouse and that the effect would be slight and not significant.

<u>4-4b</u>	<u>Section 42 response / ongoing engagement</u>	<u>Bernwood Farm</u>	<u>BC agree that the magnitude of impact would be moderate and that the effect would be slight and not significant.</u>	<u>The Applicant welcomes this agreement.</u>	<u>Agreed</u>
4-5	LIR	Harm to the significance of heritage assets	BC agree that the harm to the significance of the designated built heritage assets will be less than substantial and with the exception of those detailed in the rows below (which BC consider would experience a greater level of harm than assessed by the Applicant) BC agree that the harm would be at the lower end of that scale.	The Applicant welcomes agreement that the harm would be less than substantial and the agreement regarding the scale of harm to those heritage assets not specified below.	Agreed

4-6a	Section 42 Response, Relevant Representation and LIR	Harm to significance of Claydon House and Park	BC consider that there would be less than substantial harm to the significance of Claydon House and its associated park as a result of changes to views out from the upper floors of the house towards Knowl Hill <u>and from Knowl Hill to Claydon House,</u> and through changes to the character of the wider estate surroundings including the relationship between Claydon House and its estate farms and the overall change to the agricultural character of the estate. BC consider this harm to be in the middle of the scale of less than substantial. This relationship would also be affected by the cumulative effects of other developments, especially infrastructure.	The Applicant considers that the harm to the significance of Claydon House and its associated park as a result of changes to the views out from the upper floors of the house towards Knowl Hill and through changes to the character of the wider estate surroundings including the relationship between Claydon House and its estate farms and the overall change to the agricultural character of the estate would be less than substantial and towards the lower end of this scale. <u>Further detail on the disagreement is set out in Appendix 1.</u>	Not Agreed
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4-6b	Section 42 Response, Relevant Representation and LIR	Middle Claydon Conservation Area	BC consider that the harm to the significance of Middle Claydon Conservation Area would be at the lower end of less than substantial harm as some important elements of its significance (such as <u>the village itself and a large part of its setting</u> the listed buildings within the village) would not be harmed.	The Applicant considers that the harm to the significance of Middle Claydon Conservation Area would be at the lower end of less than substantial harm as reported with ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.43] .	Agreed
4-6c	Section 42 Response, Relevant Representation and LIR	Harm to the significance of All Saint's Church, St Mary's Church and East Claydon village, Rosehill Farmhouse, Botolph House, Botolph Claydon Conservation Area.	BC consider that the harm to the significance of these heritage assets would be less than substantial and towards the middle of this scale. BC consider that there would also be cumulative impacts on these heritage assets.	The Applicant considers that the harm to the significance of these heritage assets through changes within their setting resulting from the Proposed Development would be at the lower end of the scale of less than substantial. The Applicant considers that cumulative effects with other developments would not increase the level of effect resulting from the Proposed Development alone. <u>Further detail on the disagreement is set out in Appendix 1.</u>	Not Agreed

4-6d	Relevant Representation, LIR and ongoing engagement	Blackmoorhill Farmhouse	BC agree that there would be harm to the significance of this Grade II listed building at the lower end of less than substantial harm but consider that this would represent an effect of slight significance (and not significant).	The Applicant considers that there would be a negligible impact to the significance of this heritage asset (representing harm at the lower end of less than substantial) and that the effect would be neutral and not significant. <u>Further detail on the disagreement is set out in Appendix 1.</u>	Not Agreed
4-6e	LIR	Harm to the significance of Pond Farmhouse	BC consider that there would be harm to the significance of Pond Farmhouse through disruption to its relationship with Claydon House (which has already <u>and is being</u> en damaged by HS2, East West Rail and other infrastructure projects), and the harm would be at the upper end of less than substantial harm.	The Applicant considers that the harm to the significance of Pond Farmhouse through changes within its setting resulting from the Proposed Development would be at the middle of the scale of less than substantial. The Applicant further considers that the cumulative effect of the Proposed Development in combination with HS2 and East West Rail would remain within the middle of the scale of less than substantial harm. <u>Further detail on the disagreement is set out in Appendix 1.</u>	Not Agreed

4-6f	Meeting 05.06.26	The Fernery	Although BC consider that there would be less than substantial harm to the significance of this asset resulting a slight effect which would not be significant.	The Applicant agrees that the impact would be not significant upon this asset and that the harm is at the lower end of less than substantial. The Applicant considers that the effect would be neutral and not significant.	Agreed
4-6g	Meeting 05.06.26	Dry Leys Farmhouse	BC consider that the harm to the significance of this heritage asset would be less than substantial harm at the lower end of the scale.	The Applicant agrees that the impacts would be minor for operation and neutral for construction/decommissioning and would be less than substantial harm at the lower end of the scale.	Agreed
4-7a	Relevant Representation, LIR	Draft AMS	BC considered that the amendments to the Draft AMS at Deadline 1 are acceptable	Amendments have been made to the Draft Archaeological Management Strategy [EN010158/APP/7.10.2] at Deadline 1 to provide clarification on the timing of the archaeological fieldwork, and address the requests for provision for BC's Historic Environment Record to be supplied with copies of all of the	Agreed

				trial trenching reports which have been approved by BC and Historic England in hard and digital format.	
4-7b	Relevant Representation	Draft AMS	BC is in agreement with the proposed approach to pre-construction evaluation as detailed in the Draft AMS.	The Applicant considers that an approach whereby site-specific research questions would determine the scope of further evaluation to inform the detailed design would be more appropriate. This approach is aligned with what was agreed with Historic England and Lincolnshire Council for Springwell Solar Farm.	Agreed
4-8	Meeting 05.06.26 and Meeting 12.06.2026	Mitigation	BC have reviewed the proposed mitigation planting measures with the Applicant and agree that no further measures would be possible.	The Applicant has provided clarification on the hedgerow and tree belt heights. The Applicant considers that the screening proposed is as much as can be achieved given the topography of the Site and other environmental constraints.	Agreed
4-9	Meeting 12.06.2026	Interpretation Boards	BC agree that the Outline Landscape and Ecological Management Plan	The Applicant has committed within the Outline LEMP [EN010158/APP/7.6.5] to provide interpretation boards,	Agreed

		[EN010158/APP/7.6.3.5] secured through Requirement 7 in the Draft DCO [EN010158/APP/3.1.7] provides an appropriate mechanism to secure future agreement regarding the location, content and ongoing maintenance of interpretation boards.	noting that are not able to commit to specific locations until the detailed design stage post-DCO consent. The Applicant considers that Requirement 7 in the Draft DCO [EN010158/APP/3.1.7] provides an appropriate mechanism to secure future agreement regarding the location, content and ongoing maintenance of interpretation boards.	
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Table 5 – Cumulative Effects

Ref	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
5-1	Email correspondence	Short-list of other existing development and/or approved developments	BC agree with methodology and with the long and short-list of other existing development and/or approved developments.	ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2] sets out the cumulative effects based on the short list of developments. The Applicant remains committed to updating the cumulative long and short list as new developments come into the public domain, ensuring that the assessment remains as accurate and comprehensive as possible	Agreed

				throughout the examination process.	
5-2	Relevant Representation	'Temporary' effects	BC note that 40 years should not be considered as temporary and could lead to permanent consequential effects.	The Applicant considers that operational impacts would be temporary as the Proposed Development would be decommissioned after the 40 year operational lifespan and the land would be reinstated. This approach is consistent with the approach taken on other Solar DCO projects. The Applicant acknowledges that there would be a number of likely significant inter-project residual cumulative effects on landscape and visual and biodiversity as concluded in ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2] .	Not Agreed
5-3	LIR	Cumulative effects	BC disagree with the approach and outcome of the cumulative effects assessment particularly related to ecology, landscape and cultural heritage.	ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2] [REP1-044] considers all environmental topics, including biodiversity, landscape and cultural heritage. Relevant mitigation is secured through the Outline CEMP	Not Agreed

[EN010158/APP/7.2.2] [REP1-078] and Design Commitments [EN010158/APP/5.9.3] [REP1-020]. In addition, embedded design measures have been incorporated to avoid or reduce potential cumulative effects through the placement of infrastructure.

Table 6 – Landscape and Visual Impact

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
6-1	Section 42 response	Study area	Study area to be increased from 5km to 6km to include sensitive receptors at Waddesdon Manor and Wotton Underwood RPGs.	Study area extended to include all potentially sensitive receptors up to a 6km radius. This is illustrated on ES Volume 3, Figure 10.1: Landscape Study Area, Context and Designations [EN010158/APP/6.3] [APP-069].	Agreed
6-2	Section 42 response	ZTV	Heights of screening elements used for ZTVs should be reduced.	ZTVs were updated using reduced screening heights of 6m for buildings and 10m for woodland. The ZTVs are illustrated within ES Volume 3, Figures 10.7a to 10.9a and Figures 10.10a to 10.12b [EN010158/APP/6.3] [APP-069].	Agreed

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

				<u>Hill was submitted at Deadline 5 (ES Volume 4, Appendix 17.3: Cumulative Visualisations [EN010158/APP/6.4.2]).</u>	
6-7	Section 42 response	Visual effects	BC consider that several villages are likely to experience permanent significant adverse visual effects, including Steeple Claydon, Botolph Claydon and Granborough.	The assessment in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053] reports no significant adverse effect on the visual amenity of residents in any of villages surrounding the Site. Residents of Botolph Claydon and Granborough would experience up to moderate (not significant) effects, those of Steeple Claydon up to moderate/minor adverse (not significant) effects, whilst no other settlements would experience more than minor adverse (not significant) effects.	Not Agreed
6-8	Ongoing correspondence / LIR	Assessment methodology and conclusions	BC do not agree with the assessment conclusions, particularly related to public rights of way and landscape characters across the Claydon Bowl, Hogshaw Claylands, Twyford	The assessment methodology and conclusions are set out in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053].	<u>Not Agreed Under Discussion</u> High

			Value and areas within the Aylesbury Vale AAL.		
6-9	LIR	BESS	BC are concerned about the location of the BESS in fields D8 and D9	As set out in the response to LIR Para. Ref. 4.4.68, the Applicant respectfully disagrees that relocating the BESS would result in overall reduced impacts. ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047] and the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] explain the reasons why the proposed BESS has been located in Fields D8 and D9	Not Agreed
6-10	LIR	Mitigation	BC consider that mitigation is insufficient and in some cases worsens impacts by enclosing former open rural views	Taller elements of the Proposed Development, which include the noise barrier and BESS, are located in low lying areas of the Order Limits with proposed mitigation hedgerow planting to minimise and soften views. The solar PV development and BESS have been set back from the Bernwood Jubilee Way, given its elevated position, to allow views to continue over the top of the built elements of the Proposed Development, as described in the	<u>Not Agreed Under Discussion</u> Medium

Design Approach Document
[EN010158/APP/5.8.2] [[REP1-018](#)].

Table 7 – Land and Groundwater

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
7-1	Section 42 response / Email Correspondence	Geological hazards methodology	BC agreed that geological hazards can be scoped out of the assessment.	Table 11.1 in ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] sets out the justification for this matter being scoped out of the assessment.	Agreed
7-2	Section 42 response	Groundwater assessment methodology	BC consider that the assessment in relation to groundwater levels and flow lacks detail, and specific information on groundwater depth and flow direction is not provided. In particular, the potential for shallow groundwater impacts on the BESS is not discussed. BC considers that the detail of this assessment should be provided.	The Applicant has detailed this issue more fully in ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2.2], to bring that document in line with the management plans that provide details of mitigation measures in relation to this issue. The assessment provided in ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] was informed by the information provided in the preliminary risk assessment in ES Volume 4, Appendix 11.1: Preliminary Risk Assessment	Agreed

[EN010158/APP/6.4.2] and intrusive survey information available in **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4] [APP-125]**.

The Applicant will complete further ground investigation (the scope of which will be designed based on the findings of **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2]** and the information from **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4] [APP-125]**, and agreed with BC, and the Environment Agency, where appropriate) prior to any works commencing. This is secured in the **Outline CEMP [EN010158/APP/7.2.2]**).

It is noted that there is currently little data on the site-specific groundwater conditions. However, this does not change the fact that the groundwater importance is categorised on the basis of the aquifer designations (according to Table 11.6 of **ES Volume 2 Chapter 11: Land and**

				Groundwater [EN010158/APP/6.2.2]), which are applied by the Environment Agency based on national mapping. Although more information on site-specific groundwater conditions will be collected during ground investigation work that is still to be completed (as secured within Outline CEMP [EN010158/APP/7.2.2]), this will allow a better understanding of the specific groundwater regime, but will not fundamentally change the assessment in terms of the groundwater importance, or the magnitudes of impact that are applied for considering groundwater receptors (Table 11.8 of ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2.2]).	Agreed
7-3	Email correspondence	Approach to Mineral safeguarding	BC agreed that mineral safeguarding can be scoped out of the ES.	Mineral resources are covered in the Mineral Safeguarding Assessment which is provided in Appendix 2 to the Planning Statement [EN010158/APP/5.7.3]. The Applicant has agreed to update the Mineral Safeguarding Assessment after results of intrusive	

				ground investigation work are available.	
7-4	Section 42 response	Contamination risks	BC agree with the level of ground investigation data and are happy with the Applicant's proposed approach to verifying contamination risks.	A site investigation has been undertaken of some areas within the Site. However, it has not been possible to undertake intrusive works of the entire Site in advance of the DCO submission. An interpretive report and further site investigations would be undertaken post-consent as set out and secured in the Outline CEMP [EN010158/APP/7.2.2]. The scope of the further works would be subject to approval by the local planning authority as secured in the Outline CEMP [EN010158/APP/7.2.2]. The scope of the surveys, which includes the targeting of potential sources of contamination identified within the Preliminary Risk Assessment is secured in the Outline CEMP [EN010158/APP/7.2.2].	Agreed
7-5	Relevant Representation	Ground Investigation	BC agree with the proposed approach and welcome the addition of ground gas and groundwater monitoring as part	Section 11.5.25 of ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054] indicates that, in	Agreed

of the further Ground Investigation works proposed at pre-construction.

accordance with **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment**

[EN010158/APP/6.4.2], the identified potential contaminant linkages should be assessed further through appropriate pre-construction ground investigation. This investigation is secured by the

Outline CEMP

[EN010158/APP/7.2.2] to target the identified sources of potential contamination and assess the feasibility of identified pathways.

As detailed in and secured by the **Outline CEMP**

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

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

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

Table 8 – Soils

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

				126 sets out the survey methodology and ALC survey results.	Agreed
8-3	Section 42 response	Agricultural land	BC consider that climate change impacts, including consideration of ecosystem services have not been addressed.	ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2] [APP-055] addresses impacts related to soil quality and agricultural land quality. Climate has been assessed as part of the agricultural land classification survey to determine any limitations on agricultural land quality. Wider climate change related matters have been addressed within ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051], and the Climate Change Resilience Assessment (ES Volume 4, Appendix 8.2: Climate Change Resilience Assessment [EN010158/APP/6.4] [APP-105]). The Applicant has amended ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.3] at Deadline 4 to update all the terminology from ‘ecosystem services’ to ‘soil structure’ for clarity.	

8-4	Relevant Representation	Soil classification	BC do not agree with the topsoil classification conclusions and consider that the entire site should be Unit C (Red) - low tolerance to structural damage (see Table 2 of the Outline Soil Management Plan (SMP)). They consider that the Outline SMP fails to identify that the soil across the Site is clay / <u>heavy clay loam, weakly developed structure, non-calcareous, Wetness Class IV, which should be classed as low tolerance according to the Institute of Quarrying's Good Practice Guide for Handling Soils.</u>	The Applicant does not agree and has undertaken the ALC survey in line with the Ministry of Agriculture, Fisheries and Food (1988) Agricultural Land Classification for England and Wales: Revised Criteria for Grading the Quality of Agricultural Land (ALC011) as set out in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2] [APP-055] and ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4] [APP-126]. The topsoil texture across the site are all heavy textures but the field capacity days across the site are 136-142 therefore as the FCD are below 150 the topsoil classification is Unit B (Orange).	<u>Not Agreed</u> Under Discussion Medium
8-54	Relevant Representation / Comments on responses to the ExA FWQ	Cumulative effects	BC is satisfied that the cumulative effects on BMV land have been considered.	The cumulative assessment for soils and agriculture is located in ES Volume 2 Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037]. No significant cumulative effect on agricultural land was found and as only 1.51% of the site was BMV land. The Applicant updated ES Volume 2 Chapter 17: Cumulative Effects	Agreed

[EN010158/APP/6.2.3] [REP2-037]
at Deadline 3 to consider food security.

**Agreed
Under
Discussion
Low**

8- 65	Comments on further information received at Deadline 2	Outline Soil Management Plan	BC consider that based on the Institute of Quarrying Guidance Good Practice Guide for Handling Soils in Mineral Workings, the soils on site have low resilience to structural damage. <u>However, the appropriate methods for soil handling are outlined in the SMP and it is considered suitable for use. BC nonetheless advises that the overestimation of soil resilience could lead to a lack of care in handling the soils.</u>	The Applicant does not consider the Outline Soil Management Plan [EN010158/APP/7.7.3] [REP2-069] to contain contradictory conclusions on soil resilience. The description of the soils as slowly permeable, seasonally waterlogged and constrained by wetness relates to the baseline soil characteristics and the principal agricultural limitation identified through the ALC survey. By contrast, the classification of the soils as having medium resilience relates specifically to their susceptibility to structural damage during handling under suitable conditions, in accordance with the methodology cited in the Outline SMP [EN010158/APP/7.7.3] [REP2-069] for soils with fewer than 150 Field Capacity Days. The Applicant's position is therefore that the soils are wetness-limited in ALC terms, but can be managed as medium resilience soils for handling purposes.
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			The Applicant acknowledges that, in accordance with the Institute of Quarrying (IoQ) guidance, clay and heavy clay loam soils have an inherently low resilience to structural damage when considered on the basis of textural class alone. However, the Institute of Quarrying guidance also states that the resilience is significantly modified by the soil water regime (Soil Wetness Class) and the local climate. This is consistent with the IEMA guidelines classifying the clay and heavy clay loam soils as medium resilience due to the field capacity days being fewer than 150.		
8-76	Comments on further information received at Deadline 2	Assessment methodology	BC consider that the impact to Grade 2 land should be classed as minor.	The assessment of impacts on ALC Grade 2 land has concluded that a negligible magnitude of impact is the correct classification. The extent of ALC Grade 2 land is limited (3.01 ha), and there is no loss or reduction in soil function or soil volumes, as all Grade 2 land is either untouched, or under a grass sward in the areas of Solar PV development, or hosting ecological mitigation / enhancement.	Not Agreed Under Discussion Medium

Furthermore the effect is temporary, reversible and subject to committed mitigation.

A negligible magnitude of impact on a very high sensitive receptor results in a slight adverse and not significant effect. The justification of negligible magnitude is not based on the proportion of non-BMV land, but rather comes from a use of professional judgement that the small area of the receptor and land use does not justify a minor magnitude of effect.

Table 9 – Noise

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
9-1	Email Correspondence	Baseline methodology	BC consider that the methodology and approach to establishing baseline measurements (including the baseline noise measurement locations, report, and results) is appropriate.	The methodology is set out in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] .	Agreed

9-2	Email Correspondence / LIR	Assessment approach and methodology	<u>BC accept that the Applicant's assessment applies the methodology set out in BS 4142, and that against the Applicant's set LOAEL and SOAEL the 'with mitigation' effects of the Scheme are below the LOAEL. However, the Council remain concerned by the setting of the LOAEL at 40 dB(A) in the daytime and 35dB(A) in the nighttime specifically in the tranquil areas demonstrated in the Baseline Noise Survey. BS 4142 recognises that both absolute and relative increases in sound level should be taken into account, and not one exclusively preferred over the other. The Council do recognise that this requires an exercise of judgment, and particularly tranquil areas give rise to difficulties in assessment. However, given that some reference locations experience increases above the measured background sound level of 10 dB plus, and given the effects on PRow's, the Council has concerns that the wrong balance has been struck in applying BS 4142 in</u>	The assessment approach, methodology and conclusions are set out in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.3]. Taking into account the context in which sound occurs is an important part of a British Standard 4142 assessment. One factor stated is that the absolute level of sound can be as, or more, important than relative outcomes where background and rating levels are low. This reflects the baseline environment at noise-sensitive receptors surrounding the Proposed Development. BS 4142 does not define 'low' in the context of background sound levels nor rating levels. However, the Association of Noise Consultants suggest that background levels of less than about 30 dB LA90 and rating levels of less than about 35 dB(A) would be a reasonable indication. The background level stated reflects the conditions observed and measured in the baseline	Not Agreed
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some instances and as a result the real world impact on some receptors given the context and the characteristics of the noise is not properly taken into account. As a result, BC accepts the magnitude of impact and likely significant effects for the most part, but disagrees with the magnitudes of impact identified and likely significant effects for particularly tranquil locations. To which see Table 13.19 of ES Chapter 13: Noise and Vibration by reference to columns for exceedance above representative background sound level.

~~BC disagree with the magnitude of impact, and likely significant effect.~~

~~Whilst the Applicant's assessment methodology is accepted and no exceedances of the set lowest observed adverse effect level (35dB(A)) are anticipated, Buckinghamshire Council still has some concerns about real world impact on some residential receptors given the context and characteristic of the noise.~~

environment within the Study Area, particularly at night.

On this basis, an external rating level of 35 dB(A), inclusive of penalties for characteristics such as hums, has been adopted as the lowest observed adverse effect level for the night-time period, whereby noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. There may be a slight effect on the acoustic character of the area but not such that there is a change in the quality of life.

This approach aligns with many other consented NSIPs that have applied a similar approach due to low background sound levels, as set out in the response to Q2.13.1 in the **Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082].**

Notwithstanding this, the assessment methodology adopts a precautionary approach in regards

to the prediction of noise levels from the Proposed Development. The prediction of noise is based on the assumption that all noise generating items of plant throughout the Site will operate at full duty during both daytime and night-time periods. This is likely to overestimate the noise emissions from the Site, as a reduced operating duty would be expected during periods of the night, due to darkness and temperature fluctuations resulting in lower cooling demands.

The assessment also assumes that all sources will propagate downwind to a given receptor, regardless of the relative location; this is likely to result in a further overestimation to the predicted noise level at receptors. The relative differences between the background sound levels and predicted rating levels are therefore likely to be lower in practice than those presented in
ES Volume 2, Chapter 13: Noise

				<u>and Vibration</u> <u>[EN010158/APP/6.2.4].</u>	
9-3	Section 42 Response	Public Rights of Way	BC consider that Public Rights of Way users should be considered as a receptor for noise.	Consideration has been given to the noise impacts on PRow within/adjacent to the Order Limits as detailed in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] Paragraphs 13.8.6 to 13.8.8). Cumulative effects from other developments on users of PRow are not anticipated to be any greater than that presented for the Proposed Development in isolation (see Section 13.8 of ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]).	Agreed
9-4	Section 42 response	Working hours	BC request for noisy activities to be constrained to 08:00 – 18:00 Monday to Friday and 08:00 – 13:00) on Saturday.	Construction works would be undertaken during the hours of 07:00 to 19:00 Monday to Friday, and 07:00 to 12:00 on Saturday. Between 07:00 to 08:00 and 18:00 to 19:00 Monday to Friday and 07:00 to 08:00 on Saturdays, noisier activities (such as piling) would be restricted depending on the construction activity proposed to take place and its proximity to	Agreed

				sensitive receptors. No construction works would be carried out on Sundays or Bank or Public Holidays without prior agreement with the host authority. This is secured in the Outline CEMP [EN010158/APP/7.2.2].	
9-5	Relevant Representation / LIR	Cumulative Noise Impacts	BC are happy with the approach taken to considering cumulative noise impacts based on the updates to the Outline Construction Environmental Management Plan at Deadline 2, specifically Table 3.8, Noise and vibration: Monitoring Requirements and Para 2.22.5 stating the applicant with consult with other developments in the area.	The potential for cumulative noise impacts has been presented in ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037]. Inter-project cumulative noise effects during construction and operational phases are assessed as being not significant. In relation to the origin of construction noise that could be generated by different development sites in the area, it would be expected that noise levels at or above the adopted British Standard significance thresholds would generally be attributable to works taking place in the vicinity of the affected receptor and therefore readily identifiable in terms of their origin. The mechanism for addressing	Agreed

				construction phase complaints is set out in the Outline CEMP [EN010158/APP/7.2.5] .	
9-6	Relevant Representation	BESS Noise	BC has queried whether reliance on timber acoustic fencing as the primary acoustic barrier is sufficient, with request for the specification, installation, and maintenance of the barrier to be robustly secured through DCO requirements or consideration of supplementary mitigation. BC also comment that ongoing noise monitoring and a clear complaints procedure must be established, with adaptive	The requirement and specification of acoustic barriers and/or other appropriate mitigation measures (including refinement of the engineering requirements to adopt lower noise emitting plant, where possible) will ensure that the acoustic mitigation strategy is sufficient to reduce noise to within the adopted criteria. There are various material options that can be adopted for the acoustic barriers. Any timber acoustic fencing to be used as a barrier will have suitable material properties such that the level of noise attenuation required to meet the adopted criteria can be achieved. The specification, installation, and maintenance requirements of any acoustic mitigation scheme will be provided prior to operation and is secured by a requirement of the Outline	Agreed

OEMP [EN010158/APP/7.3.2],
(Section 2.8 refers).

It is proposed that further detail will be added into the **Outline OEMP [EN010158/APP/7.3.2]** at Deadline 1 of the examination to set out the commitment for a clear complaints procedure, including compliance noise monitoring and adaptive control measures, where deemed necessary.

Table 10 – Population and Human Health

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
10-1	Relevant Representation	Approach to Health Impact Assessment	BC acknowledges the methodological improvements made through the submission of the Health Effects Report Annex A [REP1-056] and is satisfied that it demonstrates that most regulated health pathways are unlikely to result in significant adverse effects following mitigation. BC maintains that the material should be presented as an integral part of the	Following feedback from Phase Two consultation ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6] has been produced to support the ES and sets out how a compliant assessment has been undertaken in line with ISEP (formerly IEMA) guidance and taking into account	Not Agreed Medium

ES, rather than an Annex to an Appendix.

Further, the findings of the health and wellbeing assessment, including the reported significance of health effects (i.e. whether effects are significant or not significant), should be explicitly reported within the Environmental Statement's overall conclusions through an update to the Non Technical Summary [APP-077], with clear signposting to ES Appendix 5.5 [REP1-056] and Annex A (Health Effects Report) [REP1-056].

BC's advice during the pre-application period.

A Health Effects Report is provided in Annex A of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]** which was submitted at Deadline 1 and further updated at Deadline 2 to address concerns about the presentation of health effects.

The Applicant maintains that as an Appendix to the ES, the Health and Wellbeing Summary Statement and the Health Effects Report (**Annex A to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]**) are both certified documents that have according weight alongside other elements of the Environmental Statement including the 'stand alone' chapters.

10-2 LIR	Approach to the (Population) assessment	BC disagree with the level of assessment and consider that further assessment is required to consider local businesses, local	The Applicant has undertaken a detailed assessment which considers local businesses, land use and employment capacity	Under Discussion Medium
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		employment, agricultural displacement and tourism.	change and tourism as outlined in ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057] .	
10-3	LIR (Addendum)	Health effects – noise, vibration, air quality, traffic and access, land contamination and operational safety	Buckinghamshire Council broadly agrees, on the basis of the Health Effects Report provided as Annex A to the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3] at Deadline 1 [REP1-056] , that for the regulated physical health pathways of air quality, noise and vibration, traffic and access, land contamination and operational safety, no significant residual adverse effects are predicted following mitigation, subject to the delivery of the proposed design measures, DCO requirements and management plans (as amended).	The Applicant acknowledges agreement that for the regulated physical health pathways of air quality, noise and vibration, traffic and access, land contamination and operational safety, no significant residual adverse effects are predicted following mitigation.
10-4	LIR Addendum	Health Mitigation	Buckinghamshire Council is satisfied that the majority of the mitigation relied upon in Section 6 of the Health Effects Report provided as Annex A to the ES Volume 4, Appendix 5.5: Health	The Applicant acknowledges agreement that mitigation referenced that is relied upon for health effects mitigation is adequately secured.

Agreed

Agreed

			and Wellbeing Summary Statement [EN010158/APP/6.4.3] at Deadline 1 [REP1-056] is adequately secured through the Commitments Register, Draft DCO provisions, Design Commitments and the suite of outline management plans (including the Outline CEMP [REP2-059], Outline CTMP [REP2-065], Outline RoWAS [REP2-071], Outline LEMP [REP2-067], Outline OEMP [REP2-061], Outline DEMP [REP2-063] and Outline BSMP [REP2-073]).		
10-5	LIR Addendum	Residual Significant Health Effects	Buckinghamshire Council considers that the health assessment provided by the Applicant does not: • Demonstrably ISEP social impact assessment in EIA methodology (October 2025) Consistently identify vulnerable or high-exposure geographic sub-populations through demographic analysis, or therefore provide sufficiently focused assessment to enable	The Applicant considers that: • While the ISEP guidance referenced was developed following the submission of the application, ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6] does accord with the approach to consideration of health effects identified in it.	Under Discussion Medium

- reporting on differential health effects for high-exposure geographic sub-populations, as standalone receptors; or
- Afford the assessment of significance of health effects equivalent prominence within the ES (in the absence of a stand-alone health chapter of the ES and in the absence of a Non-Technical Summary).
 - Sub-populations with greater vulnerability have been considered in-line with guidance, and that consideration of effects on individual, geographically specific receptors is not proportionate; and
 - The **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]** is a certified document with according weight in the ES and application and does not require an NTS.

Table 11 – Waste

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
11-1	LIR	Assessment of waste	The Council has concerns that full consideration of material use, and waste generation has not been provided including levels of plastic and cardboard waste during construction and operation and waste from demobilisation of the construction compounds.	Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4.3] has been updated at Deadline 4 to include the requested clarification on the worker waste, packing	Agreed

assumptions and inclusion of all temporary compounds during the operational and decommissioning phase.

11-2	LIR	Assessment of waste	These concerns undermine confidence that the Applicant has fully reported on the traffic impacts (also covering air and noise) of the Proposed Development, where full material and waste volumes are not known.	The traffic numbers that have been considered in Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4] and within the Environmental Statement incorporates a reasonable assumption that includes waste movements.	Agreed
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Table 12 – Water Environment, Surface Water, Flooding, Drainage

Ref	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
12-1	Section 42 response	Hydraulic modelling	BC agree with the level of surveys and hydraulic modelling that has been undertaken.	Detailed modelling of Claydon Brook presented in ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.2] [PDA-004]	Agreed

				has informed the baseline data. The modelling has been revised to incorporate the 30% climate chance allowance and will be submitted at Deadline 1.	
12-2	Section 42 response	Offsets from watercourses	BC consider that the offsets to Main Rivers Ordinary Watercourses are acceptable.	Perimeter fencing surrounding the Solar PV development will be offset at least 10m either side from all existing ditches and ordinary watercourses, except where access tracks and/or cable routes are required to cross an existing feature. This is in line with the guidance from the Internal Drainage Board and is secured in the Design Commitments [EN010158/APP/5.9.3] .	Agreed
12-3	Ongoing correspondence	Assessment methodology and conclusions	BC agree with the assessment methodology and conclusions.	The assessment methodology and conclusions are set out in ES Volume 2, Chapter 16: Water [EN010158/APP/6.2.2] .	Agreed
12-5	Relevant Representation	Flood Risk Assessment	BC consider that the flood risk assessment is sufficient.	ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.2] [PDA-004] has been updated to incorporate the latest climate change allowances in consultation with the Environment	Agreed

				Agency and re-issued to examination on 10 February Mitigation has been carried out in accordance with the requirements of the Environment Agency. The Applicant considers that flood risk to the Proposed Development has been suitably assessed and the proposed surface water drainage strategy has been developed to ensure run off from the Proposed Development does not increase flood risk off site.	Agreed
12-6	Relevant Representation	Surface water drainage strategy	BC considers the surface water drainage strategy sufficient	The Outline Drainage Strategy [EN010158/APP/7.11.2] provides preliminary calculations for Parcels 1, 2 and 3 based on the guidance provided by the LLFA and IDB and limiting the flow to 4l/s/ha and sizing of attenuation features for the 1% AEP + 25% climate change event. Provision of detailed drainage design including hydraulic modelling of the networks is anticipated at detailed design when development layouts are finalised. The drainage network will be designed to contain the 1 in 30 year event storm and to	

safely manage exceedance flows for events up to the 1 in 100 year + CC.

Agreed

12-7	Relevant Representation	Water Quality	BC (as the LLFA) does not support discharging potentially contaminated runoff from tanks directly into watercourses. They consider that water quality should be managed through SuDS features such as swales, ponds, and bioretention areas. Following further engagement, BC no longer see this as an issue and agree with this matter.	An assessment using the Simple Index Approach in accordance with SuDS Manual Ciria C753 has been undertaken and results for all 3 Parcels are provided in the Outline Drainage Strategy [EN010158/APP/7.11.2]. This provided information on the level of treatment provided by the proposed SuDS features. Where required, additional measures were proposed to mitigate pollution risk from the high pollution hazard areas. This is presented in Section 8: Water Quality of the Outline Drainage Strategy [EN010158/APP/7.11.2] and proposed to be implemented as part of the detail drainage design. Should contaminated water be identified, it would either be appropriately treated and discharged or contained and tankered off site using an appropriate waste carrier. For example, in the unlikely event of a fire at the BESS, retained water would be tested by the Operator. If
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			contaminated (polluted), the water would be removed from site by tanker for treatment at an appropriately licensed offsite facility. If testing confirms that the water is suitable for discharge or reuse, it would be released to the local drainage network under controlled conditions, in consultation with the relevant regulators or reused as a potential source of firefighting water by re-filling the water tanks. This approach ensures that environmental protection is maintained under both normal and emergency conditions.	Agreed
12-8	Relevant Representation	Drainage	Comment that two soakaway tests were undertaken (TP002 and TP014) which is insufficient for a site of this scale. Following further engagement, BC no longer see this as an issue and agree with this matter. The Outline Drainage Strategy [EN010158/APP/7.11.2] demonstrates that a conservative approach has been taken assuming that infiltration is not considered a viable primary surface water disposal method for the proposed development. Patrial infiltration has been assumed for the conveyance SuDS, which is subject to further ground investigation and infiltration potential from underlying geology.	

Table 13 – Traffic and Transport

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
13-1	Section 42 response / ongoing correspondence	Baseline methodology	BC agree with the methodology and approach to establishing baseline traffic conditions (survey locations, report and results).	The methodology is set out in ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058] and ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] .	Agreed
13-2	Section 42 response / ongoing correspondence	Assessment of construction, Impact	BC consider that the assessment should be undertaken at the peak of construction traffic on all routes within the agreed study area.	Agreed and included in the ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058] and ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] .	Agreed
13-3	Section 42 response / ongoing correspondence	Traffic Impact	BC consider that the impact of construction traffic does not lead to significant effects and is short term in nature.	Agreed and included in the ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058] and ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] .	Agreed

13-4	Section 42 response / ongoing correspondence	Mitigation Measures	BC consider that mitigation measures are required to ensure the safe and efficient use of the study area road network for all road users.	Mitigation measures are detailed in Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058] and Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5.2] .	Agreed
13-5	Section 42 response / ongoing correspondence	Abnormal Load Access	BC request for access of abnormal loads to be fully considered and assessed.	ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] contains an AIL Route Survey. The Outline CTMP [EN010158/APP/7.5.2] considers abnormal load traffic management measures.	Agreed
13-6	Relevant Representation	Access route	BC agrees with the Applicant's proposed access route, but requests that ongoing discussions with HS2 should continue.	The support of BC on the access route is noted and agreed. The Applicant will continue to engage with HS2 and will use the Stakeholder liaison measures set out in the Outline CTMP [EN010158/APP/7.5.2] to ensure that full engagement is undertaken.	Agreed
13-7	Relevant Representation	Provision of drawings	BC requests further drawing details relating to the site access junctions.	Full junction drawing details are provided in the Outline CTMP [EN010158/APP/7.5.4] with swept path assessment drawings. These	Agreed

				provide junction layout, road marking, cross section and dimension details and are of a standard accepted for DCO scale projects.	
13-8	Relevant Representation	Staff Travel Plan	BC request further information on staff travel and how the mode share targets will be guaranteed.	Staff travel will be controlled by a Staff Travel Plan, as outlined in the Outline CTMP [EN010158/APP/7.5.2]. The mode targets in the Outline CTMP [EN010158/APP/7.5.2] will be enforced via two regimes. Firstly, the contractor is bound to accept the mode share targets under the contractual arrangements with the Applicant, ensuring compliance, monitoring and the full introduction of the travel plan. Secondly, as staff travel is part of the Outline CTMP [EN010158/APP/7.5.2], its implementation under the DCO is a legal requirement, ensuring that the Applicant and their contractor must ensure compliance with staff mode share targets. At the request of Buckinghamshire Council, the mode share targets will be included in the Outline CTMP	Agreed

				[EN010158/APP/7.5.4] at Deadline 4.	Agreed
13-9	Relevant Representation	Trip generation and traffic impact	BC has requested peak hour traffic flow information, details on how staff mode share will be achieved and enforced and a junction assessment at the A41 / Station Road Junction.	Peak hour flow data can be provided, however the assessment provided is consistent with energy project assessments undertaken for DCO scale projects across the UK and provides sufficient impact details for BC to consider, noting that the traffic impact indicates that there are no significant traffic effects in ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]. With regards to staff travel mode share, this will be controlled by a Staff Travel Plan, as outlined in the Outline CTMP [EN010158/APP/7.5.2]. The mode targets in the detailed Construction Traffic Management Plan will be enforced via two regimes. Firstly, the contractor is bound to accept the mode share targets under the contractual arrangements with the Applicant, ensuring compliance,	

monitoring and the full introduction of the travel plan.

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

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

Junction assessments at the A41 / Station Road junction have been undertaken as discussed with Buckinghamshire Council and the results shared. The junction has sufficient spare capacity to accommodate peak construction traffic movements.

13-10	Relevant Representation	Construction effects	BC consider that cumulative effects during construction would be significant and they consider that consideration should be given to the staggering of construction programmes.	The Applicant updated the Outline CEMP [EN010158/APP/7.2.4] at Deadline 2 to include a commitment for collaboration with other developers prior to construction, on programme and at the discharge of requirements phase to manage	Agreed
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interactions and reduce any associated potential cumulative impacts, where practicable.

Table 14 – Public Rights and Way and Amenity

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
14-1	Relevant Representation/ Local Impact Report	Reinstatement of temporary PRow closures	BC welcomes the commitment to limit temporary closures to a maximum of six months per route. The Council welcomes the Applicant's confirmation that the surface of PROWs will be reinstated post construction following cable laying, at least to the pre-construction condition.	It is the intention that temporarily diverted PRow would be reinstated to at least their original condition post construction. Details such as surfacing of routes would be discussed with and approved by BC to create an appropriate high-quality network. This secured in the Outline Rights of Way and Access Strategy (RoWAS) [EN010158/APP/7.8.2] [REP1-090].	Agreed
14-2	Relevant Representation/ Local Impact Report	Permanent diversions	Diversion of Footpaths ECL/4/2 within Parcel 3 and ECL/7/2 within Parcel 2 - the proposals are acceptable in principle. It is not considered that the minor inconvenience as a result of the diversions amounts to a layout of the scheme which would discourage recreational use.	The diversions are secured by the Streets, Rights of Way and Access Plans [EN010158/APP/2.4.3] [REP1-006] and the Outline RoWAS [EN010158/APP/7.8.2] [REP1-090].	Agreed

14-3	Relevant Representations/ Local Impact Report	Permanent diversions	Diversion of Footpath SCL/13/2 and SCL/13/1 within Parcel 1 - the application proposal creates a dead-end at Ponds Farm which BC considers to be unacceptable. A revised alignment is required to maintain connectivity. BC also requests the applicant considers an alternative which creates a desire line that eliminates the right-angle bend at Calvert Road. <u>Following confirmation that no fencing will be implemented along PRow SCL/12/2 and SCL/13/1 through field B5 during operation unless agreed with BC, this matter is agreed.</u>	The Applicant has reduced the length of PRow SCL/12/2 that is stopped up, connecting the stretch of SCL/12/2 that runs through the Ponds Farm complex to the permanently diverted route to the west. This maintains connectivity and prevents a dead end. This was updated in the Outline RoWAS [EN010158/APP/7.8.2] [REP1-090] at Deadline 1. BC confirmed by email dated 18 May 2026 that retention of the current proposed alignment would be acceptable, to facilitate circular walks from Steeple Claydon, subject to a design commitment to ensure the PRow in this location are not fenced in at a later date. The wording of the design commitment is currently under discussion with BC.	Agreed Under Discussion Low
14-4	Relevant Representations/ Local Impact Report	Recorded width of diversions	BC request a 2m width is recorded in the definitive statement for newly created public footpaths resulting from the proposed diversions. BC would welcome an undertaking in the Outline RoWAS to address this at the detailed design stage.	The Outline RoWAS [EN010158/APP/7.8.3] [REP2-071] requires any new or diverted routes to be designed in accordance or with regard to design standards adopted by BC, and be approved by BC before they are implemented. It was updated at Deadline 2 to include reference to a 2m width being recorded in the definitive statement for newly created	Agreed

				public footpaths resulting from the proposed diversions, unless this would require hedgerow removal where the routes pass through existing gaps in hedgerows or where there are gates or stiles in place. Details of any variations from the 2m width will be identified in the submitted detailed Rights of Way and Access Strategy. This commitment will be updated in the Draft DCO [EN010158/APP/3.1.7] at Deadline 4.	Agreed
14-5	Relevant Representation/ Local Impact Report	Permissive footpaths	A permissive path network is provided for in the Application and welcomed. However, an additional permissive path linking Knowl Hill and Knowlhill Farm is recommended to mitigate impacts of additional traffic along Calvert Road and until wider connections can be made when the permissive path network is opened.	Creating an additional link to the proposed permissive route from the south and south east, to link to MCL/17/1 and/or MCL/18/1 at Knowlhill Farm, would require the route to cross land outside the main developable area which is only required to be used by Applicant for cabling and/or construction and maintenance access. This area would be returned to agricultural use following construction, and the additional link is not considered necessary to mitigate the effects of the Proposed Development. It is not anticipated that traffic would increase on Calvert Road during construction, as it is not part of the primary construction route for construction	

14-6	Relevant Representation/ Local Impact Report	Three Points Lane	BC requested segregation of non-motorised users along Three Points Lane to avoid conflict with construction traffic. BC would welcome clarity on where in the application documents smaller areas for construction compounds than the maximum parameters shown on ES Volume 3, Figure 3.8: Indicative Location of Primary and Secondary Construction Compounds [EN010158/APP/6.3.2] [AS-021] is provided for but, on the basis that traffic would only be crossing Three Points Lane, BC consider that not providing	traffic or the Abnormal Indivisible Load (AIL) access route. The permissive paths are intended to be implemented during the construction phase, as secured in the Outline RoWAS [EN010158/APP/7.8.2] [REP1-090]. It is therefore not considered appropriate to provide this link. BC confirmed by email 13 May 2026 that the operational reasons for not providing this link are acceptable. A single construction compound is proposed on Three Points Lane. ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034], sets out that each Primary Construction Compound would be no greater than 25,000m² in plan. The maximum plan area is secured through the Outline CEMP [EN010158/APP/7.2.2] [REP1-078]. Construction traffic would not travel along Three Points Lane. It would cross Three Points Lane between Fields SA12 and B23 (South) only, as indicated in ES Volume 3, Figure 3.11: Indicative Location of Internal Access Tracks [EN010158/APP/6.3] [APP-063]. The access point shown in	Agreed
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			a segregated route would be acceptable.	ES Volume 3, Figure 3.9: Indicative Construction and Operational Access [EN010158/APP/6.3] [APP-063] into Field B20 would only be used during operation. It is therefore not considered necessary to provide a segregated route behind the highway boundary hedge.	
14-7	Relevant Representation/ Local Impact Report	PRoW network improvements	An opportunity exists to upgrade Footpaths SCL/8/2 and QUA/41/1 to bridleway status, closing a gap in the network and deleting the dead-end bridleway to Coppice Lowhill Farm. It is an opportunity to maximise opportunities to facilitate enhancements within NPS EN-3 para 2.10.44. A variety of permissive paths are provided to improve the walking connectivity during the lifetime of the development and enhance the recreational options. While BC accepts there is no direct mitigation in diverting the bridleway in this part of the site, it could form part of the Proposed Development's wider package	Notification of a proposed change was published by the ExA on 6 May 2026. The proposed change looks to provide a bridleway link to connect the existing dead-end PRoW Bridleway (reference 'ECL/10/5') to the north of Field D27 to the PRoW Bridleway (reference 'QUA/40/2' and 'QUA/40/3') that runs along the southern edge of Fields D28 and D29. The bridleway link, if accepted by the ExA, would be accessible to the public during the operation (including maintenance) phase. It would run south west along the proposed internal access track through Field D27 and then along PRoW Footpath (reference 'QUA/41/1') through Field D28. BC confirmed by email 13 May 2026 that this approach would be acceptable.	Agreed

of local access improvements, at no additional cost. This supports ROWIP objectives, NPPF para 105 and Policy C4 of VALP.

14-8	Relevant Representation/ Local Impact Report	Upgrades to existing footpaths	The removal of stiles within the application boundary and replacement with mobility gates or gaps would support local policy and legislation aiming to improve access for the mobility impaired. This would be in accordance with NPS EN-3 para 2.10.44 and is something BC would welcome being secured in the Outline Rights of Way and Access Strategy.	This would be further assessed at the detailed design stage and at that time would be discussed with and approved by BC. The Outline RoWAS [EN010158/APP/7.8.3] [REP2-071] requires any new or diverted routes to be designed in accordance or with regard to design standards adopted by BC, which would include in relation to stiles and gates, and be approved by BC in that regard before they are implemented and was updated at Deadline 2 to secure review of the location of stiles across the Site and consideration of their accessibility during the detailed design.
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Agreed

5. Signatures

This Statement of Common Ground is agreed upon:

On behalf of Buckinghamshire Council

Name:

Signature:

Date:

On behalf of the Applicant

Name:

Signature:

Date:

Appendix 1 - Cultural Heritage Summary



Table 1 - Summary of areas of agreement and disagreement between the Applicant and Buckinghamshire Council

<u>Asset</u>	<u>Applicant's assessment of magnitude</u>	<u>Council's assessment of magnitude</u>	<u>Applicant's assessment of level of harm</u>	<u>Council's assessment of level of harm</u>	<u>Applicant's assessment of significance of effect</u>	<u>Council's assessment of significance of effect</u>
<u>Claydon House and Park</u>	<u>minor</u>	<u>minor</u>	<u>lower end of less than substantial</u>	<u>middle of less than substantial</u>	<u>slight</u>	<u>moderate</u>
<u>The Fernery and Arch and wall to stables</u>	<u>negligible</u>	<u>negligible</u>	<u>lower end of less than substantial</u>	<u>lower end of less than substantial (but greater than applicant's assessment)</u>	<u>neutral</u>	<u>slight</u>
<u>All Saint's Church</u>	<u>negligible</u>	<u>minor</u>	<u>lower end of less than substantial</u>	<u>middle of less than substantial</u>	<u>slight</u>	<u>moderate</u>
<u>Botolph Claydon Conservation Area</u>	<u>minor</u>	<u>moderate</u>	<u>lower end of less than substantial</u>	<u>middle of less than substantial</u>	<u>slight</u>	<u>moderate</u>
<u>Botolph House</u>	<u>minor</u>	<u>minor</u>	<u>lower end of less than substantial</u>	<u>middle of less than substantial</u>	<u>slight</u>	<u>moderate</u>
<u>East Claydon</u>	<u>minor</u>	<u>moderate</u>	<u>lower end of less than substantial</u>	<u>middle of less than substantial</u>	<u>slight</u>	<u>moderate</u>

<u>St Mary's Church</u>	<u>negligible</u>	<u>minor</u>	<u>lower end of less than substantial</u>	<u>middle of less than substantial</u>	<u>slight</u>	<u>moderate</u>
<u>Rosehill Farmhouse and Barns</u>	<u>negligible</u>	<u>minor</u>	<u>lower end of less than substantial</u>	<u>middle of less than substantial</u>	<u>neutral</u>	<u>slight (upper end)</u>
<u>Blackmoorhill Farmhouse</u>	<u>negligible</u>	<u>minor</u>	<u>lower end of less than substantial</u>	<u>middle of less than substantial</u>	<u>neutral</u>	<u>slight</u>
<u>Pond Farmhouse</u>	<u>moderate</u>	<u>major</u>	<u>middle of less than substantial harm</u>	<u>upper end of less than substantial harm</u>	<u>moderate</u>	<u>moderate verging on large</u>
<u>Bernwood House</u>	<u>moderate</u>	<u>moderate (close to major)</u>	<u>middle of less than substantial harm</u>	<u>upper end of less than substantial harm</u>	<u>slight</u>	<u>slight</u>

Green highlighting represents matters of full agreement between the parties

Yellow highlighting represents matters of partial agreement between the parties



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