

## **Rosefield Solar Farm – EN010158**

### **Rosefield Energyfarm Limited**

#### **Section 51 Advice Log**

**Version: 25 September 2025**

There is a statutory duty under [section 51 \(s51\) of the Planning Act 2008](#) for the Planning Inspectorate to record the advice that it gives in relation to an application or potential application, and to make this publicly available.

This document comprises a record of the advice that has been provided by the Inspectorate to the applicant Rosefield Energy Farm Limited and their consultants during the pre-application stage. It will be updated by the Inspectorate after every interaction with the applicant during which s51 has been provided. The applicant will always be given the opportunity to comment on the Inspectorate's draft record of advice before it is published.

The applicant will use this Advice Log as the basis for demonstrating regard to section 51 advice within the application.

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Date of meeting	Meeting overview
<a href="#">09/10/2024</a>	<ol style="list-style-type: none"> <li>1. Welcome and Introductions (All)</li> <li>2. Consultation Update (App)               <ol style="list-style-type: none"> <li>a) Themes arising from non-statutory consultation</li> <li>b) Ongoing statutory consultation</li> </ol> </li> <li>3. Illustrative Masterplan development (App)</li> <li>4. National Grid Substation works (App)</li> <li>5. Natural England SSSI designation (App)</li> <li>6. Next Steps (All)</li> <li>7. AOB (All)</li> </ol>
<a href="#">02/05/2025</a>	<ol style="list-style-type: none"> <li>1. Update on Statutory Consultation</li> <li>2. Design Development/Evolution</li> <li>3. New National Grid Substation</li> <li>4. Additional targeted consultation</li> <li>5. Natural England SSSI Designation</li> <li>6. Submission Programme.</li> </ol>
<a href="#">27/08/2025</a>	<ol style="list-style-type: none"> <li>1. Crown Estate Land</li> <li>2. Survey Methodology</li> <li>3. Submission Documentation</li> <li>4. SharePoint Access</li> <li>5. Shapefile Submission</li> <li>6. Adequacy of Consultation Milestone (AoCM) Feedback</li> </ol>

Rosefield Solar Farm -s51 Advice Library	
Topic	Meeting date: 09 October 2024
Statement of Community Consultation (SoCC)	The Inspectorate noted that within non-statutory consultation phase, the Applicant engaged with action groups and hard to reach people. The Inspectorate queried whether the Local Authorities had been consulted on how to reach these groups and whether this has been covered within the SoCC and approach agreed. The Applicant confirmed they did consult and invited the hard-to-reach groups to advise how they want to be consulted with. The Applicant advised they have also been helpful in sharing their registers of local groups.
Programme document	The Inspectorate advised the Applicant to include what it had undertaken in the SoCC within the updated programme document.
National Grid substation works	The Inspectorate noted that the Applicant's present consideration of two options for substation development, which included one being proposed next to the existing National Grid substation. The Inspectorate queried whether on submission in Q2 2025, it will decide on one preferred substation location. The Applicant confirmed its aim is to have one preferred option.
Programme to submission	The Inspectorate advised the Applicant to update their Programme document to reflect their scheduled submission dates the position on Statements of Common Ground (SoCGs) and/or service level agreements (SLA) with Local Authorities. The Inspectorate also advised the Applicant to update the programme document with SoCGs with Natural England (NE) and the Environment Agency (EA).
Programme document	The Inspectorate advised it is encouraging Applicant's to make a public facing version of the Programme document available on its own project website. The Inspectorate confirmed it is not anticipating publishing a public facing version on the National Infrastructure project website. The Inspectorate explained the more information shown within the Programme document, the better advice the Inspectorate can provide.
Programme Document (post-meeting note feedback)	The applicant submitted an initial Programme Document to the Inspectorate in July 2024 in reply to our Expression of Interest request regarding our new pre-application service. Having reviewed the document, the Inspectorate considers that it satisfactorily covers the expected content as set out

	<p>in the government's <a href="#">pre-application guidance at paragraph 10</a>, namely:</p> <ul style="list-style-type: none"> <li>• “the date the applicant intends to submit their application</li> <li>• a comprehensive timetable of the applicant’s pre-application process, the main events with dates and milestones demonstrating how the pre-application process will be completed (using the maximum target of 2 years as a benchmark)</li> <li>• the applicant’s view on the main issues for resolution and activities they will undertake to address those</li> <li>• the applicant’s proposals for engaging with statutory consultees and local authorities during the pre-application period and any intended financial support agreements, such as Planning Performance Agreements (PPAs)</li> <li>• the applicant’s identification of risks to achievement of the pre-application stage and the process by which these risks are tracked and managed</li> <li>• cross references to the SoCC required by <a href="#">section 47 of the Planning Act</a>”.</li> </ul> <p>The Programme Document provides enough detail about the proposed development, timetable, and activities for the pre-application process, the main issues as identified by the applicant, the progress and completion of PPAs, as well as the applicant's methods for engaging with stakeholders and its approach to mitigating the programme risks.</p> <p>It would be helpful if the applicant could set out whether the Programme Document has been shared with the local authorities and statutory consultees as well as an Issues Tracker in its next iteration, and provide an expected date for the Adequacy of Consultation Milestone, as well as details on any other relevant consents or licenses needed and any update or resolution of matters in its proposed activities in the ‘main issues’ table (such as its ongoing engagement and / or progress with SOCGs with Natural England, the Environment Agency, Historic England, and Buckinghamshire Council on biodiversity, flood risk, cultural heritage and cumulative issues respectively, where feasible).</p>
<b>Topic</b>	<b>Meeting date: 02 May 2025</b>
Statutory Consultation	The applicant updated the Inspectorate on its statutory consultation held in December 2024.

	<p>The Inspectorate asked the applicant if any comments had been received from consultees on the extent of detail provided in respect of the grid connection corridor options (north and south) and the flexibility being sought in the design of the proposed development. The applicant replied that some consultees were expecting a level of design detail that could not be confirmed yet. However, the applicant was able to illustrate and explain to consultees the need for such optionality, as well as the main design changes between its 2023 Masterplan at non-statutory consultation stage and the current, statutory consultation Masterplan and Preliminary Environmental Information Report.</p> <p>The Inspectorate advised the applicant to set out its mitigation strategy and commitments register clearly within its documentation, to assist with consultees' understanding of the applicant's measures likely to be required to ensure that good design objectives will be secured and implemented. This is to ensure that potential environmental effects arising from the project are mitigated as far as possible and in accordance with the mitigation hierarchy.</p>
Design Development	<p>The applicant provided an overview of its non-statutory consultation masterplan and consultation feedback, as well as its statutory consultation masterplan and zonal masterplan highlighting the evolution of the design over time. Some of the design changes include relocating infrastructure away from areas of flood risk at Claydon Brook and mitigating views towards the listed Claydon House, the registered park and gardens and other local heritage assets. On feedback from tenant farmers in particular, the applicant is considering removing certain areas of land on its southern connection grid corridor option to avoid disruption to farming practices.</p> <p>The Inspectorate asked about various connections options across Home Wood – whether these options will remain in the Development Consent Order (DCO). The applicant replied that its preferred corridor option will form part of its draft DCO and application at the acceptance stage.</p>
National Grid substation	<p>After statutory consultation the site boundary changed, with substantial areas discounted. The Inspectorate asked about National Grid's new substation and the progress of its Town and Country Planning Act 1990 (TCPA) application to achieve planning consent. The applicant explained that National Grid has undertaken its site selection exercise, and it is expected that the TCPA application would be submitted in the next few months following engineering and environmental surveys. A zone of land under the Rochdale</p>

	Envelope has been mapped to where the new substation is expected to be located together with the battery storage and has formed part of the Order Limits at statutory consultation stage, as denoted in its consultation material and maps.
Targeted Consultation	<p>The applicant identified a need for additional targeted consultation from 21 May to 16 July 2025, owing to removing certain land areas earmarked for access routes and instead seeking to use parts of the track access used for the HS2 railway line development. This was not part of the statutory consultation phase and the applicant is looking to produce a newsletter explaining the further design evolution, expected to be published on 21 May.</p> <p>The applicant's Adequacy of Consultation Milestone (AOCM) statement is expected to be submitted by mid-May 2025, but owing to the recent local elections in Buckinghamshire, it is awaiting feedback from the Council before submitting the statement to the Inspectorate. The Inspectorate expressed its preference to delay the submission of the AOCM statement until the Council (and any other relevant councils) have provided any views on the adequacy of consultation to date (given that the provision of any views or material from councils at the AOCM stage is an important part of assessing as to whether any further consultation is required before submitting the application for acceptance).</p>
Natural England SSSI Designation	<p>The applicant informed the Inspectorate that Natural England are looking to potentially designate a new Site of Special Scientific Interest (SSSI) named Bernwood near the southern end of the proposed development's Order Limits. The new SSSI is the result of the renotification, amalgamation and enlargement of the SSSI within Bernwood under Section 28 of the Wildlife and Countryside Act 1981. The new SSSI follows the existing HS2 work being undertaken to mitigate effects on bat populations and the introduction of bat tunnels, as well buffers and offsets to visual impacts and public rights of way. Additionally, the applicant explained that it was seeking to use access routes created by the HS2 rail development for its proposed development.</p> <p>The Inspectorate advised the applicant to ensure it clearly explains how any modification to the Order Limits and/or mitigation undertaken as a result of the new SSSI designation is recorded in its application documents, as well as any additional consultation undertaken. The applicant should also proactively seek a Statement of Common Ground with Natural England on its assessment of the</p>

	<p>worst-case scenario under the Environmental Statement. The applicant added that Natural England have identified several fields that they would like to see removed from the proposed development in order to accommodate the SSSI designation. The applicant was considering Natural England's communications on this but did not believe that significant changes to its Order Limits and expected land take would be necessary.</p>
Cumulative Effects	<p>The Inspectorate asked the applicant about cumulative effects from other projects – namely HS2 and East West Rail and if there were any other solar farms or Town and Country Planning Act (TCPA) applications nearby.</p> <p>The applicant informed the Inspectorate of Longbridge Solar Farm and the respective battery storage which has gone through a TCPA application, and were assessing any cumulative effects accordingly.</p>
Submission Programme and Next Steps	<p>The applicant highlighted that the Environmental Statement Design Freeze is now complete with the expected submission of the application in November 2025.</p>
<b>Topic</b>	<b>Meeting date: 27 August 2025</b>
Crown Estate Land	<p>The Inspectorate queried the presence of crown land within the project. The applicant confirmed that there is no Crown Land within the Order Limits.</p>
Potential Bernwood Site of Special Scientific Interest (SSSI)	<p>The applicant confirmed that there is insufficient information to undertake an environmental assessment relating to the potential designation of Bernwood SSSI, including no known extent of this potential future receptor. There is therefore no reasonable worst case that can be assessed. The applicant has assessed the Proposed Development in relation to the features which Natural England have highlighted as potential designated interest features within the potential Bernwood SSSI, including: Bechstein's bats, black hairstreak butterfly, and the existing woodland designated as SSSI and ancient woodland.</p> <p>The applicant agreed to continue to engage with Natural England and respond accordingly if/when details of the potential designation are further progressed and made available.</p>
Survey Methodology	<p>The Inspectorate queried whether Natural England was supportive of the applicant's survey approach, which the applicant confirmed. The Inspectorate explained that, should the application be accepted for examination, it would</p>

	likely assess the justification for the survey methodology due to the concerns raised by some stakeholders regarding its suitability. The Inspectorate emphasised the importance of demonstrating any agreement with Natural England to support the approach to address this.
Submission Documentation	<p>The Inspectorate advised the applicant to submit its application index as early as possible to allow sufficient time for any necessary amendments. It also highlighted the importance of avoiding the use of certain special characters in document name, as highlighted in the index.</p> <p>Additionally, the Inspectorate queried whether the applicant intended to submit any confidential documents. It advised that any such documents should be clearly marked as confidential within the submission.</p>
SharePoint Access	The Inspectorate advised the applicant that access to its SharePoint site would be granted two weeks prior to submission to allow for testing.
Shapefile Submission	The applicant informed the Inspectorate that it was ready to submit its shapefile. The Inspectorate welcomed the early submission but advised that it should only be provided once the applicant is confident it is the final version.
Adequacy of Consultation Milestone (AoCM) Feedback	<p>The AoCM was received by the Inspectorate ahead of the meeting. The Inspectorate notes that only Buckinghamshire Council comments were sought on the adequacy of consultation, but that their response is that the applicant has undertaken consultation in accordance with the requirements of sections 42, 47 and 48 of the Planning Act 2008.</p> <p>Post Meeting Note</p> <p>Having reviewed the submitted information including Buckinghamshire Council's response, the Inspectorate does not consider that the consultation is seriously adrift.</p> <p>The Inspectorate does note that no latest date is given on the notice for availability of documents. It would be helpful for this information to be included in the consultation report. It would also be helpful for the consultation report to include a contents page to navigate the documents.</p>