

Rosefield Solar Farm

Potential Main Issues for Examination

EN010158/APP/5.10
September 2025
Rosefield Energyfarm Ltd

APFP Regulation 5(2)(q)
Planning Act 2008
Infrastructure Planning
(Applications: Prescribed Forms
and Procedure) Regulations 2009



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1. Introduction

1.1. Introduction

- 1.1.1. This Potential Main Issues for Examination Document has been prepared on behalf of Rosefield Energyfarm Limited ('the Applicant') to accompany the Development Consent Order (DCO) application for the construction, operation (including maintenance), and decommissioning of Rosefield Solar Farm (hereafter referred to as the 'Proposed Development')

1.2. The Order Limits

- 1.2.1. The extent of the Order Limits are shown in **Location, Order Limits and Grid Coordinate Plans [EN010158/APP/2.1]** and the Proposed Development is described in full in the **Environmental Statement (ES) Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and shown spatially on the **Works Plans [EN010158/APP/2.3]**.

1.3. The Proposed Development

- 1.3.1. 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.
- 1.3.2. The Proposed Development would include a generating station with a total exporting capacity exceeding 50 megawatts ('MW').
- 1.3.3. The location of the Proposed Development is shown on **ES Volume 3, Figure 1.1: Location Plan [EN010158/APP/6.3]**. The Proposed Development would be located within the Order Limits (the land shown on the **Works Plans [EN010158/APP/2.3]** within which the Proposed Development can be carried out). The Order Limits plan is provided as **ES Volume 3, Figure 1.2: Order Limits [EN010158/APP/6.3]**. Land within the Order Limits is known as the 'Site'.

1.4. Purpose of this document

- 1.4.1. This document has been prepared and submitted in compliance with the Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus (September 2024) and Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('the APFP Regulations') which states: *"The application must be accompanied by... any other documents considered necessary to support the application"*.

- 1.4.2. This document does not set out a consideration or assessment of likely significant effects, this is delivered within the **ES [EN010158/APP/6.1-6.4]**. The purpose of this document is to provide the Examining Authority (ExA) with a summary of the main residual issues, expressed by key stakeholders, remaining at the time of the DCO Application submission that require further discussion. In preparing this document, the Applicant has drawn on feedback from the pre-application and engagement process and identified the main issues or areas of potential disagreement based on engagement with relevant statutory bodies and Buckinghamshire Council. The issues set out in **section 2** do not constitute a definitive list of matters still outstanding with key stakeholders and does not preclude stakeholders from raising further concerns during the planning process. The intended purpose of this document is to provide an indication of potential residual main issues that require further discussion, demonstrating the Applicant's awareness of key concerns and commitment to transparency.
- 1.4.3. This document has been prepared in consultation with relevant stakeholders and has been shared with the relevant stakeholders and the contents agreed, where possible, prior to the submission of the DCO Application. Buckinghamshire Council provided a response following their review of the draft Potential Main Issues for Examination document which identified a number of additional concerns. As set out in paragraph 1.4.2 above, this document is not intended to be a definitive list of matters still outstanding with stakeholders, nor is it a consideration or assessment of likely significant effects. On review of Buckinghamshire Council's response, the Applicant does not consider that the additional concerns raised fit within the scope of this document and have not included these matters within Table 1 below, however, their response has been included at Appendix 1 for full transparency. It is the Applicant's hope that a number of the concerns raised, particularly those around the need for a robust assessment, will be considered resolved once Buckinghamshire Council review the submitted DCO Application. If Buckinghamshire Council's concerns remain after review of the submitted DCO Application, the Applicant has requested that these concerns be included within their Relevant Representation and Local Impact Report. Additionally, the Applicant will seek to capture these points within a future Statement of Common Ground (SoCG) with Buckinghamshire Council.
- 1.4.4. This document has been presented in the format provided by the Planning Inspectorate.
- 1.4.5. It is anticipated that a number of the issues outlined in this document may be resolved between the submission of the DCO Application and Examination, when stakeholders will have an opportunity to review the DCO Application and provide Relevant Representations. The Applicant will also continue to engage with stakeholders for the negotiation of 'protective provisions' where necessary. It is the Applicant's intention to continue to

work with stakeholders throughout the DCO Examination to resolve issues wherever possible.

- 1.4.6. Finally, the Applicant intends to agree SoCG's with relevant stakeholders to be set out in the Rule 6 and Rule 8 letters issued by the ExA following acceptance of the DCO Application. These SoCGs will remain live through the course of the Examination as the Applicant continues to engage on any outstanding matters, and a final position will be submitted prior to the close of Examination.

2. Potential Main Issues for Examination

- 2.1.1. **Tables 1** below sets out the remaining main issues with each of the relevant stakeholders that have not been resolved prior to submission of the DCO Application.
- 2.1.2. The tables provide an overview of the concerns held by each Stakeholder, where this concern is addressed in the DCO Application, and the Applicant's position on the likelihood of the issue being resolved prior to, or during, the Examination. The tables include a Red/Amber/Green rating to highlight the likelihood of each issue being resolved as outlined below.




Cell	Status
	Green – issues that are likely to be resolved prior to or during Examination.
	Amber – issues which are in discussion and may be resolved during Examination.
	Red – fundamental disagreements which are unlikely to be resolved during Examination

Table 1: Potential Main Issues for the Examination

Ref	Description of Issue	Affected Stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
PMI1	<p>Impacts to Bats:</p> <p>The effects of solar development to commuting, roosting and foraging bats (in particular Bechstein's Bats), due to potential fragmentation and isolation of woodland and connecting hedgerows which would reduce ecological connectivity across the Site have been highlighted as particular areas of focus for Natural England, Buckinghamshire Council and BBOWT. They would like to see increased buffers and removal of solar development from certain fields within the Proposed Development.</p>	Natural England, Buckinghamshire Council, BBOWT, National Trust	<ul style="list-style-type: none"> • Design Commitments [EN010158/APP/5.9] • ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1], • ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2], • ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3] • ES Volume 4, Appendix 7.10: Bat Activity Survey Report (2024) [EN010158/APP/6.4] • Outline Construction Environmental Management Plan 		<p>Medium</p> <p>The Applicant's position:</p> <p>The Applicant considers that the mitigation measures included within the DCO Application for commuting, roosting and foraging bats are appropriate.</p> <p>The sensitivity of the location of the Proposed Development, particularly with respect to commuting, roosting and foraging bats, is fully acknowledged and Figures 11-13 of ES Volume 4, Appendix 7.10: Bat Activity Survey Report (2024) [EN010158/APP/6.4] identifies the key areas for commuting and foraging bats and has informed the design of the Proposed Development.</p> <p>The Applicant has consulted with key stakeholders to discuss the potential impacts to foraging, commuting and roosting bat species throughout the pre-application period. In response, in addition to removal of sensitive areas from the developed area, significant buffers have been incorporated into the embedded design of the Proposed Development to</p>

Ref	Description of Issue	Affected Stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
			<p>(CEMP) [EN010158/APP/7.2].</p> <ul style="list-style-type: none"> Outline Landscape and Ecological Management Plan (LEMP) [EN010158/APP/7.6]. 		<p>ensure the retention of existing habitats. Along with retaining existing habitats of value, these significant buffers will allow for habitat creation and improvements to maintain and enhance the connectivity between the woodland blocks and help mitigate any displacement effect of Solar PV modules on foraging and commuting bats and avoid the risk of displacement from HS2 mitigation planting, as well as providing habitat suitable to support a range of species.</p> <p>Trees that have been identified with bat roost potential will be protected by a buffer and demarcation fencing, as detailed within and secured by the Outline CEMP [EN010158/APP/7.2]. However, if it is found that any trees with bat roost potential would experience direct impacts, they would be surveyed prior to impact to determine presence/or likely absence of a roost. If a Bechstein's bat or barbastelle roost is identified within a tree that requires removal, the tree would be left in situ and retained in its entirety with an appropriate buffer. If a roost that is not a Bechstein's bat or barbastelle is identified, in the first instance the design of the Proposed</p>

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					Development would be amended to ensure retention and protection of the tree and roost with an appropriate buffer. If this is not possible, depending on the roost type and species using the roost, loss of a confirmed bat roost would be mitigated and compensated under a European Protected Species licence from Natural England. These mitigation measures are detailed within and secured by the Outline CEMP [EN010158/APP/7.2] . A variety of bat boxes would be installed in suitable locations on hedgerow trees or in woodland to increase roosting opportunities, detailed within and secured by the Outline LEMP [EN010158/APP/7.6] .
PMI2	<p>Proposed Bernwood SSSI:</p> <p>Natural England confirmed its intent to designate a new Site of Special Scientific Interest (SSSI), the Bernwood SSSI, and requested the Applicant undertake an assessment of the proposed Bernwood</p>	Natural England	<ul style="list-style-type: none"> ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2], 		<p>Medium</p> <p>The Applicant's position:</p> <p>At this stage, the Applicant is unable to undertake a meaningful assessment of the effects of the Proposed Development on the potential Bernwood SSSI as the extent of the designation is not known. However, the ES [EN010158/APP/6.1–6.4] includes a detailed assessment of its potential designation interest features (ancient woodland, Bechstein's bats and hairstreak</p>

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	SSSI designation as if it were already in place.				butterflies) and considers the potential for in-combination effect on these receptors where an effect is considered likely. Therefore, the Applicant considers that the conclusions of these individual assessments can be applied to the Bernwood SSSI, should the SSSI be designated following submission of the DCO Application and before the DCO Application is determined.
PMI3	<p>Impacts to ancient woodland and SSSI sites</p> <p>The Proposed Development's proposed offsets to ancient woodlands and SSSI are not considered suitable. It is also considered that the Proposed Development would fragment and isolate the woodland blocks, reducing connectivity across the wider landscape. It is not accepted that the residual effects of the development</p>	BBOWT, Buckinghamshire Council, National Trust	<ul style="list-style-type: none"> • Design Commitments [EN010158/APP/5.9] • ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] 		<p>Medium</p> <p>The Applicant's position:</p> <p>The Applicant considers that the offsets embedded into the Proposed Development are appropriate. Perimeter fencing surrounding the Solar PV development will be offset at least 30m from existing SSSI sites and ancient woodlands, as secured in the Design Commitments [EN010158/APP/5.9] This is in excess of Natural England and the Forestry Commission's 'standing advice' which states that development proposal should have a buffer zone of at least 15m from the boundary of the woodland to avoid root</p>

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	on these woodlands will be not significant.				<p>damage (known as the root protection area).</p> <p>Along with protecting the areas of ancient woodland, these buffers will also allow for the creation of high-quality habitats, such as a mosaic of species-rich grassland, scrub, woodland planting. This will help to ensure the connections between the existing SSSIs and ancient woodland adjacent to the Proposed Development would be enhanced.</p> <p>Perimeter fencing surrounding the Solar PV development will be offset at least 30m from existing woodland and hedgerows located along the boundaries of Field D29 and partially in Field D28. Additional woodland planting is proposed within these fields to strengthen the corridor between Finemere and Runt's Wood.</p>
PMI4	<p>Survey Scope</p> <p>Disagreement as to the appropriateness of the survey effort for some receptors.</p>	Buckinghamshire Council, BBOWT	<ul style="list-style-type: none"> • ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] • ES Volume 4, Appendices 7.1-7.16 [EN010158/APP/6.4] 		<p>Medium</p> <p>The Applicant's position:</p> <p>The Applicant considers that the approach to surveys for the Proposed Development is appropriate and in compliance with the EIA Scoping Opinion as provided in ES Volume 4, Appendix 5.2: EIA Scoping Opinion</p>

Ref	Description of Issue	Affected Stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
	<p>Including for Buckinghamshire Council, surveys for;</p> <ul style="list-style-type: none"> - Bats - Breeding birds - Wintering birds - Invertebrates - Reptiles - DNA testing for Black Poplar Trees. <p>Including for BBOWT, surveys for:</p> <ul style="list-style-type: none"> - Invertebrates - Reptiles 		<ul style="list-style-type: none"> • Outline CEMP [EN010158/APP/7.2] • Outline DEMP [EN010158/APP/7.4] • Outline LEMP [EN010158/APP/7.6] 		<p>[EN010158/APP/6.4]. Details of the surveys carried out for the Proposed Development are set out within the Environmental Statement [EN010158/APP/6.1 – 6.4].</p> <p><u>Bats</u></p> <p>As set out in ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] Natural England are supportive of the use of paired sampling to inform the baseline conditions of the Site.</p> <p><u>Breeding birds</u></p> <p>Survey coverage has made sure that all areas identified for solar development have been covered by breeding bird survey. Two years' worth of breeding bird data gives a very robust data set from which to be able to assess the impacts of the proposed scheme. Birds are highly mobile and any survey is a snapshot in time. Therefore, the assessment is based on two years' worth of data not a single snapshot and is further supported with the desk study data results. Appropriate pre-construction nesting bird surveys will be undertaken.</p> <p><u>Wintering birds</u></p>

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					<p>The Applicant considers that the two years of wintering bird survey data that accompanies the DCO Application is a robust baseline to assess the impacts of the Proposed Development on wintering birds. Wintering birds are highly mobile, and any survey is a snapshot in time. Therefore, the assessment is based on two years' worth of data not a single snapshot.</p> <p><u>Invertebrates</u></p> <p>A preliminary assessment for habitats suitable to support notable and protected invertebrate species was undertaken as part of ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4] updated in 2025 (ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]). The assessment noted that the butterfly species included within the citations for Sheephouse Wood and Finemere Wood SSSI will use both woodland and hedgerow margin habitat. Blackthorn, the food source for black and brown hairstreak caterpillar, species included as SSSI citation features, was recorded abundantly across the site within hedgerows and woodland areas, and</p>

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					<p>therefore the Applicant can safely assume presence without the need for survey to confirm what is already known. Targeted surveys of sections of hedgerow that will require removal will be undertaken pre-construction to assess for the presence of black and brown hairstreak butterfly eggs, with section of hedgerow that support black and brown hairstreak eggs translocated to other areas within the Order Limits.</p> <p><u>Reptiles</u></p> <p>The majority of habitat on site is considered unsuitable to support reptiles with only small areas identified that have potential to support common reptile species. The design of Rosefield has included for the retention of these habitats (field margins, hedgerows, woodland and scrub).</p> <p><u>Black Popular Trees</u></p> <p>Principal components of the Proposed Development will avoid root protection areas of trees and hedgerows as far as reasonably practicable, except where a hedgerow crossing is required for access tracks and/or cable routes as secured in the Design Commitments [EN010158/APP/5.9].</p>

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					There are a small number of trees within the Order Limits that will require removal to facilitate the construction of access tracks and/or cable routes, however, we do not anticipate that any poplars (which we have assumed for the purposes of assessment could be classified as 'Black Poplars') would be removed or impacted by the Proposed Development. Mitigation measures to protect trees during the construction, operation and decommissioning phases of the Proposed Development are secured in the Outline CEMP [EN010158/APP/7.2] , Outline OEMP [EN010158/APP/7.3] , Outline DEMP [EN010158/APP/7.4] and Outline LEMP [EN010158/APP/7.6] .
PMI5	Embedded mitigation and Proposed Development design It is considered that the design of the Proposed Development should be more site and species-specific and considers that embedded mitigation in the current design is too	Buckinghamshire Council, BBOWT	<ul style="list-style-type: none"> • ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] • ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] 		Medium The Applicant's position: ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] and ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] set out how the design of the Proposed Development has

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	generic. They are not clear how embedded mitigation measures have been decided based on the results of surveys undertaken.		<ul style="list-style-type: none"> • ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3] • Outline LEMP [EN010158/APP/7.6] 		<p>responded to site and species-specific constraints.</p> <p>Site and species-specific measures have been 'embedded' into the design of the Proposed Development to remove potential likely significant effects as far as practicable. This includes:</p> <ul style="list-style-type: none"> • The removal of Solar PV development from Parcel 1a to reflect the importance of the connectivity between Sheephouse Wood and Romer Wood for bats. This Parcel is instead proposed for ecological mitigation and enhancements. • The offset from Solar PV development and the hedgerow corridors between Sheephouse Wood, Shrubs Wood and Decoypond Wood within the boundaries of Fields B7, B8, B9, B10, and B11 have increased from 10m to 15m either side of the hedgerows. This will provide an enhanced biodiversity corridor to connect these woodland blocks

Ref	Description of Issue	Affected Stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
					<ul style="list-style-type: none"> The offset from the Solar PV development and the hedgerow corridor between Runt's Wood and Finemere Wood within the northern boundaries of Fields D28 and D29 has increased from 20m to 30m following feedback from statutory consultees. This will provide an enhanced biodiversity corridor to connect these woodlands, in particular for bats. <p>Additional to the above, it should be noted that Requirement 9 of the Draft Development Consent Order [EN010158/APP/3.1] requires the detailed Landscape and Ecological Management Plan to be submitted to and approved by the relevant planning authority prior to commencement. This would be based on the detailed design of the Proposed Development and would include more specific mitigations than what is currently set out in the Outline LEMP [EN010158/APP/7.6], although it would need to be substantially in accordance with that Outline LEMP. As such, it will be within the control of Buckinghamshire Council whether to approve the detailed Landscape</p>

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					and Ecological Management Plan at that time.
PMI6	<p>Archaeological Trial Trenching</p> <p>Buckinghamshire Council has requested that 4% of the areas of deeper impacts (Rosefield Substation etc.) and where the geophysical survey recorded anomalies should have trial trenching undertaken pre-determination, alongside a 2% coverage of any apparently 'blank' areas of Solar PV development.</p>	Buckinghamshire Council	<ul style="list-style-type: none"> Draft Archaeological Management Strategy [EN010158/APP/7.10] 		<p>Medium</p> <p>The Applicant's position:</p> <p>The Applicant considers that 2-4% trial trenching across the entire Order Limits is not proportionate. The Order Limits have been evaluated through geophysical survey and in addition the areas of hard infrastructure (Substation, BESS, Collector Compound siting zones) have been investigated through trial trenching as these are areas that the Applicant knows would experience below ground disturbance as part of construction and have limited options for subsequent design change. This approach, along with the worst-case assessment within the ES for currently unknown archaeological remains, is considered to provide a robust assessment. The proposed approach to further post-consent evaluation is set out within the Draft Archaeological Management Strategy [EN010158/APP/7.10] which proposes a further stage of specialist geophysical survey to identify areas of increased archaeological potential which</p>

Ref	Description of Issue	Affected Stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
					will then be subject to targeted trial trenching. This approach is in line with emerging best practice guidance.
PMI7	<p>Impacts on heritage assets</p> <p>There are concerns around the visual impact of the Proposed Development on the setting and significance of Claydon House, Claydon Park Grade II Registered Park and Garden and Conservation Area, Claydon House Grade I listed building and Public Rights of Way Users, Scheduled Monuments and Middle Claydon and Botolph Claydon Conservation Area.</p>	National Trust, Historic England	<ul style="list-style-type: none"> • Works Plans [EN010158/APP/2.3] • ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] • ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3] • Outline LEMP [EN010158/APP/7.6] 		<p>Medium</p> <p>The Applicant's position:</p> <p>The Applicant has made a number of changes to its proposed design in response to the stakeholder concerns, aimed at reducing visibility of the development from Claydon House, and therefore reducing the level of effect to Claydon Park Grade II Registered Park and Garden and Conservation Area and Claydon House Grade I listed building.</p> <p>These measures include:</p> <ul style="list-style-type: none"> • Removal of solar PV development in Field B17 • Reduction of solar PV development in the north-east corner of Field B9 the south-east corner of Field B11 • Hedgerows to be kept to heights of 3 – 3.5m as secured by the Outline LEMP [EN010158/APP/7.6]

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					<ul style="list-style-type: none"> Satellite Collector Compound is proposed to be sited within a set area in Field B23 (south) as it is considered that this is less visible than the other option of Field B10 although it is closer to the house and it was preferred from an ecological perspective. The constrained area, and additional mitigation through vegetation planting will minimize the effects of the Satellite Collector Compound on Claydon House. <p>The above is shown in ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3] and secured by the Works Plans [EN010158/APP/2.3]. The Applicant considers that harm to the significance of the heritage assets at Claydon would be at most within the lower extent of less than substantial harm and the effects would be not significant.</p>
PMI8	Floodplain Compensation There are concerns around the impact of the proposed solar arrays impacting floodplain storage in areas	Environment Agency	<ul style="list-style-type: none"> ES Volume 2, Chapter 16: Water [EN010158/APP/6.2] ES Volume 4, Appendix 16.1: 		High The Applicant's position: The Applicant considers that the potential effects caused by placing some of the Solar

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	of fluvial floodplain to the west of the Claydon Brook tributary.		Flood Risk Assessment [EN010158/APP/6.4] <ul style="list-style-type: none"> Outline Drainage Strategy [EN010158/APP/7.11] 		PV Arrays within the fluvial floodplain are negligible, as the infrastructure will be limited to the supporting columns of the Solar PV Arrays. There will be no land raising or other infrastructure placed within the fluvial floodplain.

Appendix 1

Buckinghamshire Council

Response to draft

document





Rosefield Energyfarm Ltd
Alexander House
1 Mandarin Road
Rainton Bridge Business Park
Houghton Le Spring
Sunderland
DH4 5RA

Directorate for Planning, Growth & Sustainability

Planning and Environment

██████████
Buckinghamshire Council
Walton Street Offices
Walton Street
Aylesbury
HP20 1UA

██████████@buckinghamshire.gov.uk
10 September 2025

Dear ██████████

Subject: Buckinghamshire Council Response to Potential Main Issues for Examination – Rosefield Solar Farm

Thank you for providing Buckinghamshire Council with the Potential Main Issues for Examination (PMI) document for the Rosefield Solar Farm, received on 21 August 2025, ahead of your anticipated DCO submission.

We welcome the opportunity to review and comment on this document as part of our ongoing engagement. The PMI is a useful summary of headline issues and demonstrates your awareness of key stakeholder concerns. However, having reviewed the PMI alongside our own detailed analysis and priority table, we wish to highlight the following points:

1. Role and Scope of the PMI Document

We appreciate that the PMI serves to summarise the principal matters likely to be examined by the Planning Inspectorate. While it is not a statutory or binding document, we understand its value in guiding the process. The Council reserves the right to raise additional matters during the DCO process as appropriate, and we continue to engage in constructive dialogue as we move into the next stage.

2. Adequacy of the PMI – Areas of Agreement and Concern

While the PMI covers several important topics, including impacts to bats and ancient woodland, survey methodology, heritage assets, archaeological trial trenching, and floodplain compensation, our review indicates that it does not fully reflect the scope or depth of Buckinghamshire Council's concerns. In particular, we note the following:

- **Cumulative Effects:**

The PMI does not explain whether a sufficiently detailed methodology or commit to a

robust, cross-topic cumulative assessment. The Council requires cumulative effects to be assessed across ecology, landscape, noise, highways, and socio-economic impacts, including all relevant projects (HS2, EWR, other solar farms, BESS, etc.).

- **Landscape & Visual Impact:**

The PMI does not fully address the need for a robust, site-specific Landscape and Visual Impact Assessment (LVIA), larger and flexible buffers, or cumulative landscape effects. Residential amenity and PRow users must be considered as sensitive receptors. Significant adverse effects are likely in several LCAs and villages, and buffers are currently too small and generic.

- **Noise & Cumulative Impacts:**

Cumulative noise impacts from BESS and other projects, sensitive receptor mapping, and stricter construction hours are not fully addressed in the PMI. Comprehensive cumulative noise assessment, including all relevant projects and sensitive receptors (including PRow users), is required.

- **Socio-Economic Impact:**

The PMI lacks a full socio-economic assessment, including impacts on farming, businesses, jobs, community cohesion, tourism, and cumulative effects.

- **Arboricultural Matters:**

The PMI does not reflect the Council's requirements for larger buffers, updated survey methods (BS5837:2025), or individual management plans for ancient/veteran trees.

- **PRow & Amenity:**

Legal protection for new paths, upgrades to bridleways, accessible gates, and full amenity assessment are not fully covered in the PMI.

- **Population & Human Health:**

The PMI does not commit to a dedicated human health chapter or robust assessment of cumulative health effects.

- **Embedded Mitigation & Design:**

The PMI presents mitigation as sufficient, but the Council requires more detail, flexibility, and clear linkage to survey results. Mitigation must be site- and species-specific, not generic.

- **Heritage Assets:**

The PMI presents the applicant's approach as sufficient, but the Council finds it inadequate; cumulative and group value not fully addressed. Mitigation must be site-specific and agreed with Council.

- **Floodplain Compensation:**

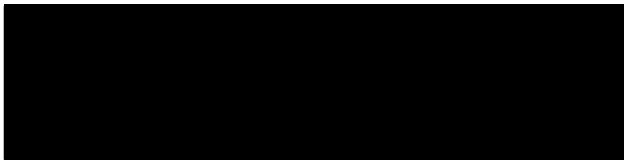
The PMI does not reflect Council's requirement for larger offsets, more detailed modelling, and integration of SuDS. Lifetime flood risk not fully considered.

3. Next Steps

We will continue to engage constructively with you to resolve issues where possible but reserve the right to raise further matters as the Examination progresses.

We look forward to continued engagement and to receiving the full DCO submission in due course.

Yours sincerely,

A large black rectangular redaction box covering the signature area.A small black rectangular redaction box covering the name.

Corporate Director, Planning, Growth and Sustainability



rosefieldsolarfarm.co.uk