# Rosefield Solar Farm

## Draft Statement of Common Ground – UK Health Security Agency

EN010158/APP/5.12.2
Revision 02
March 2026
Deadline 1
Rosefield Energyfarm Limited

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# 1. Introduction

## 1.1. Overview

1.1.1. This Statement of Common Ground ('SoCG') has been prepared on behalf of Rosefield Energyfarm Limited ('the Applicant') in relation to the Development Consent Order (DCO) application for the construction, operation and decommissioning of Rosefield Solar Farm (hereafter referred to as the 'Proposed Development').

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

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

## 1.2. Parties to this Statement of Common Ground

1.2.1. This SoCG has been prepared by the Application and UK Health Security Agency.

1.2.2. UK Health Security Agency are a statutory stakeholder defined for the Rosefield Solar Farm Development Consent Order Application.

1.2.3. Collectively, the Applicant and UK Health and Safety Agency are referred to as 'the parties'.

## 1.3. Purpose of this Document

1.3.1. This Statement of Common Ground ('SoCG') is being submitted to the Examining Authority as an agreed draft between both parties. This SoCG is a 'live' document and will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.

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

1.3.3. Paragraph 007 of the DLUHC Guidance comments that:

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

*and therefore makes best use of the lines of questioning pursued by the Examining Authority'.*

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

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

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

1.3.7. This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents will be available in the deposit locations and/or the Planning Inspectorate website after submission of the DCO Application.

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

## 1.4. Terminology

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

| Cell | Status |
|---|---|
| | Agreed - indicates where an issue has been resolved. |
| | Under Discussion - indicates where points continue to be the subject of on-going discussions between the 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 comprises the installation, construction and decommissioning works, with the details to be defined at detailed design and subject to approval by the 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 **Environmental Statement (ES) Volume 3, Figure 1.1: Location Plan [EN010158/APP/6.3] [APP-061]** and described in **ES Volume 1, Chapter 2: Location of the Proposed Development [EN010158/APP/6.1] [APP-045]**, with the consideration of alternatives and the evolution of the design of the Proposed Development presented in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**.

2.1.4. The principal components of the Proposed Development include:

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

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

- Battery Energy Storage System (BESS) compound comprising: batteries and associated Inverters; Transformers; Switchgear, ancillary equipment and their containers; office, control and welfare buildings; fencing and acoustic barriers; monitoring, maintenance and emergency systems; air conditioning; electrical cables; fire safety infrastructure; operation (including maintenance) security facilities; material storage; and material laydown areas;
- Interconnecting Cabling Corridor(s) to connect the Solar PV modules and the BESS to the Satellite and Main Collector Compounds to the Rosefield Substation;
- A Grid Connection Cable Corridor to connect the Rosefield Substation to the National Grid East Claydon Substation via 400kV cabling;
- Ancillary infrastructure works comprising: boundary treatment; security equipment; lighting; fencing; landscaping; internal access tracks; works to facilitate vehicular access; earthing devices; earthworks; surface water management; utility connections and diversions; and any other works identified as necessary to enable the Proposed Development;
- Green and blue infrastructure, recreation and amenity works comprising: landscaping; habitat management; biodiversity enhancement; the creation of three permissive footpaths; and works to permanently divert four PRoW Footpaths in five instances;
- 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 early stages of the project. Table 1 shows a summary of key engagement that has taken place between the Applicant and UK Health and Safety Agency in relation to the Application.

Table 1 - Record of Engagement

| Date | Form of correspondence | Key topics discussed and key outcomes |
|---|---|---|
| 1 May 2025 | Teams Meeting Online | Methodology for the proposed Plume Assessment at pre DCO submission stage of project. |
| 8 May 2025 | SOCG, minutes and copy of presentation shared with UKHSA. | |
| 29 May 2025 | UK Health Security Agency issued email response with requested amendments to minutes. | Minutes updated and reshared on 06/06/2025. |
| 15 July 2025 | BESS Plume Assessment Summary and draft oBSMP shared by EDFR with UKHSA for comments | |
| 11 August 2025 | Formal Email/letter response from UKHSA for BESS Plume Summary document and oBSMP | Request for Atmospheric dispersion modelling, AEGL results discussion, visual representation of receptors in relation to BESS, wind direction discussion and modelling software info requested. |
| 13 August 2025 | Teams Meeting Online | Updated methodology for proposed atmospheric dispersion modelling and updates to current plume study discussed to ensure all UKHSA comments are addressed and UKHSA agree that the methodology proposed is reasonable and meets their requirements. |

| | | |
|---|---|---|
| 15 August 2025 | Email response from UKHSA on SOCG | Amendments made as suggested in UKHSA response dated 15/08/2025 for SOCG have been incorporated in updated version of this document. |
| 15 January 2026 | Email to UKHSA to share the draft Plume Addendum Report – Atmospheric Dispersion Modelling | To address the comments that the UKHSA have made during the relevant representations period of the examination. |
| 4 February 2026 | Letter Received from the UKHSA in response to Plume Addendum Report – Atmospheric Dispersion Modelling. | Confirmation received from the UKHSA that all of the previous comments that were provided following submission of the **BESS Plume Assessment Summary [EN010158/APP/7.13.2]** have been addressed. Acknowledgement that the risk to the public for nearby receptors from chemicals emitted during a BESS fire is likely to be low. |

# 4. Current Position

## 4.1. Position of the Applicant and UK Health and Safety Agency

4.1.1. The following tables set out the position of the Applicant and UK Health and Safety Agency, following a series of meetings and discussions with respect to the key areas of the Proposed Development. This includes matters where discussions are ongoing.

4.1.2. 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

Table 2 – Topics Discussed

| Ref | Description of Matter | Stakeholder Comment | Applicant's Response | Status |
|---|---|---|---|---|
| **1** | Methodology for Plume Assessment and Atmospheric Dispersion Modelling Report. | Draft Plume Summary Assessment has been shared with UKHSA, and an atmospheric dispersion modelling report has been issued for UKHSA review. | A letter was received from UKHSA on 4 February 2026 that confirmed all outstanding comments had been addressed and the assessment considers worst-case scenario of chemical emissions during BESS fire and the risk to nearby receptors is likely to be low. Please refer to **Appendix A**. | **Agreed, subject to final approval** |

# 5. Signatures

This statement of Common Ground is agreed upon:

On behalf of UK HSA Security Agency

Name: Please see the letter from UKHSA that follows.

Signature:

Date:

On behalf of the Applicant

Name:

Signature:

Date:

Appendix A – UKHSA letter dated 4 February 2026.

# Appendix A – UKHSA letter dated 4 February 2026.

UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN010158
Our Ref: 92738

[redacted]
DCO Engineering Manager,
EDF Renewables
Alexander House,
1 Mandarin Road,
Rainton Business Park
Houghton le Spring
DH4 5RA

4th February 2026

Dear [redacted]

**Nationally Significant Infrastructure Project**
**Rosefield Solar Farm**
**Plume Assessment Addendum**
**[PINS reference: EN010158]**

Thank you for providing a draft Plume Assessment Addendum (doc ref: EN010158/APP/8.2) relating to the above development on 15 January 2026.

We have reviewed the draft Plume Assessment Addendum, whilst also considering our previous comments made throughout the consultation process. Please note our previous responses as listed below and this response should be read in conjunction with that earlier correspondence:

| | |
|---|---|
| Non-statutory Consultation | 01/11/2023 |
| Request for Scoping Opinion | 08/12/2023 |
| Public Consultation Section 42 | 14/11/2024 |
| Statement of Common Ground (Draft 1) | 29/05/2025 |
| Draft Plume Assessment and OBSMP | 11/08/2025 |
| Statement of Common Ground (Draft 2) | 15/08/2025 |
| Registration of Interest | 09/12/2025 |

Below is a summary of our assessment of the detailed plume assessment addendum and whether the addendum addresses our previous comments made on the submitted plume

assessment (doc ref: EN010158/APP/7.13) at the Registration of Interest consultation stage in December 2025:

- Recommendation 1: *"We acknowledge that a final detailed dispersion modelling plume assessment cannot be undertaken until the battery system to be used has been finalised. However, detailed dispersion modelling is the most useful output for assessing the potential risks to public health from a BESS incident. It would therefore be beneficial for a preliminary detailed dispersion modelling assessment to be undertaken, based on the current proposed BESS location and equipment, to inform the plume assessment chapter."*
    - This comment has been addressed through the provision of the detailed plume assessment report (doc ref: EN010158/APP/8.2) for review and comment on 15/01/26.

- Recommendation 2: *"… for future detailed dispersion modelling (once BESS components are selected) it is recommended that UK Air Quality Guidelines and AEGLs are also used to assess the potential public health impacts of emissions to air..."*
    - This comment has been addressed. The applicant details the assessment criteria used in Section 3 of the report. Table 3.1 includes relevant AQS and Table 3.2 contains relevant AEGLs (converted from ppm to µg/m3 at 10.7°C) that are required to assess model outputs in the context of public health risk.

- Recommendation 3: *"…It is therefore recommended that the applicant provides this information on meteorological site selection and meteorological data duration (for example, from June 2019 to July 2024) in the next iteration of the report/chapter."*
    - This comment has been addressed. Sections 4.2.24 - 4.2.26 detail meteorological data range and source used for the assessment. The applicant has provided an appropriate justification for using these data.

- Recommendation 4: *"…It is therefore recommended that a table and map showing sensitive receptor locations and their distance from the proposed BESS location be included in the next iteration of the report."*
    - This comment has been addressed. The applicant in section 4.2.35 provides both a table with x/y coordinates (Table 4.4) as well as a map (Figure 4.3) clearly identifying human receptor locations and their proximity to the site.

- Recommendation 5: *"…we note that the prevailing wind direction is towards the north-east which is away from the nearest receptor highlighted in the report. However, at the detailed dispersion modelling stage, it would be beneficial to include a sensitivity analysis to evaluate the potential health impacts on sensitive receptors who are not in the prevailing wind direction."*
    - Although the applicant has not conducted a sensitivity analysis using the approach we suggested, they provided worst-case predicted concentrations at nearby receptor locations using five years of meteorological data. This

approach captures the range of meteorological conditions likely to occur at the site and therefore provides a suitably conservative assessment of risk to nearby receptors. Consequently, we are satisfied with this approach.

- Recommendation 6: *"…It is therefore recommended that details of the model and software used to undertake the plume assessment is noted in the next iteration of the report."*
    - This comment has been addressed. Details and justification of the model used (ADMS) are included in sections 4.2.7 - 4.2.9. Emission parameters are included in section 4.2.10 - 4.2.18, physical parameters are shown in section 4.2.19 - 4.2.24.

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Overall, the addendum provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low.

Yours sincerely

On behalf of UK Health Security Agency
nsipconsultations@ukhsa.gov.uk

*Please mark any correspondence for the attention of National Infrastructure Planning Administration*

Rosefield
Solar Farm

rosefieldsolarfarm.co.uk

Application Document Ref: EN010158/APP/5.12.2
Planning Inspectorate Scheme Ref: EN010158