

Rosefield Solar Farm

Draft Statement of Common Ground –
National Trust

EN010158/APP/5.17
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 ('the 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 Applicant and National Trust.
- 1.2.2. National Trust is an independent charity responsible for the conservation of historic buildings, gardens, landscapes, and areas of natural beauty across England, Wales, and Northern Ireland. The Trust owns and manages over 250,000 hectares of land, including coastlines, countryside, and heritage assets, and operates under the statutory powers to preserve these for the benefit of the nation.
- 1.2.3. The National Trust does not have a statutory role under PA 2008 or the associated secondary legislation. However, the Trust may participate in the DCO process where a proposed NSIP affects land or heritage assets it owns or manages. In such cases, the National Trust may engage as an interested party by submitting relevant representations during the pre-examination phase, and may participate in the examination through written submissions and hearings.
- 1.2.4. Collectively, the Applicant and National Trust are referred to as 'the parties'.

1.3. Purpose of this Document

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

- 1.3.2. The SoCG has been prepared in accordance with the Ministry of Housing Communities and Local Government and Department for Levelling Up, Housing and Communities' Guidance on the examination stage for Nationally Significant Infrastructure Projects ('DLUHC Guidance')¹.
- 1.3.3. Paragraph 007 of the DLUHC Guidance comments that:
- "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 National Trust and the Applicant on matters relating to the DCO Application.
- 1.3.5. The document will be updated as more information becomes available and as a result of ongoing discussions between the Applicant and National Trust.
- 1.3.6. The SoCG is intended to provide information for the examination process, facilitate a smooth and efficient examination, and manage the amount of material that needs to be submitted.
- 1.3.7. This SoCG does not seek to replicate information which is available elsewhere within the DCO Application documents. All documents will be available in the deposit locations and/or the Planning Inspectorate website after submission of the DCO Application.
- 1.3.8. Once finalised, the SoCG will be submitted to the Examining Authority that is examining the DCO Application under section 37 of the Planning Act 2008 for an order granting development consent for the Proposed Development.
- 1.3.9. For the purposes of examination, this SoCG addresses the matters related to Claydon House and Gardens.

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.

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

Cell	Status
	Agreed - indicates where an issue has been resolved.
	Under Discussion - indicates where points continue to be the subject of on-going discussions between parties.
	Not Agreed - indicates a position where both parties have reached a final position that a matter cannot be agreed between them.

2. Proposed Development Description

- 2.1.1. The Proposed Development comprises the construction, operation (including, maintenance), and decommissioning of solar photovoltaic ('PV') development and energy storage, together with associated infrastructure and an underground cable connection to the National Grid East Claydon Substation.
- 2.1.2. The Proposed Development includes the installation, construction and decommissioning works, with the details to be defined at detailed design and subject to approval by the relevant Local Authority. The detailed design of the Proposed Development will be required to be undertaken within the parameters assessed in the Environmental Statement, which are secured through a range of control documents including the **Works Plans [EN010158/APP/2.3.3]**, the **Design Commitments [EN010158/APP/5.9.3]** and the requirements set out in the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.3]**.
- 2.1.3. The design of the Proposed Development has evolved throughout the environmental assessment process to avoid or minimise environmental effects and in response to consultation and engagement feedback, where appropriate. The location of the Proposed Development is shown in Figure 1.1: Location Plan in **Environmental Statement Volume 3, Background and Context Figures 1.1 - 1.2 [EN010158/APP/6.3] [APP-061]** and described in **ES Volume 1, Chapter 2: Location of the Proposed Development [EN010158/APP/6.1] [APP-045]**, with the consideration of alternatives and the evolution of the design of the Proposed Development presented in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**.
- 2.1.4. The principal components of the Proposed Development include:
- Solar PV development consisting of:
 - Ground mounted Solar PV generating station. The generating station would include Solar PV modules and mounting structures; and
 - Balance of Solar System (BoSS) which comprises: Inverters; Transformers; Switchgear; Combiner Boxes; acoustic barriers and cabling.
 - A project substation (the 'Rosefield Substation') compound comprising: Transformers; Switchgear; reactive power compensation bays; disconnectors; circuit breakers; busbars; control equipment; lightning surge arrestors; building(s) including office, control, functions, material storage, material laydown areas and welfare facilities; firewalls; fencing and acoustic barriers; a security cabin; parking as well as wider monitoring, maintenance and emergency equipment;
 - A Main Collector Compound and two Satellite Collector Compounds comprising: Switchgear; Transformers; ancillary equipment; operation and maintenance and welfare facilities; material storage; material laydown areas; fencing and acoustic barriers; and security cabins;

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

3. Record of Engagement

3.1. Record of Engagement

3.1.1. The parties have been engaged in consultation throughout the early stages of the Proposed Development. Table 1 shows a summary of key engagement that has taken place between the Applicant and National Trust in relation to the DCO Application.

3.1.2. A detailed breakdown of engagement that has been undertaken pre-submission of the DCO Application is provided in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052]**.

Table 1 - Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
30 January 2024	Teams Meeting Online	<p>Discussion on settings impacts on Claydon House and Registered Park and Garden.</p> <p>National Trust highlighted the importance of Home Wood to the setting of Claydon House and raised concerns about any development located in views from Claydon House and wished to see these areas removed from the Proposed Development or appropriate mitigation measures to screen the Proposed Development from view.</p>
26 March 2024	Onsite Meeting	<p>Discussion with National Trust and Historic England on settings impact for Claydon House as Knowl Hill is a notable view.</p> <p>The visibility of Solar PV modules on Knowl Hill has been reduced by removing the summit and the north facing slope of the hill from areas of Solar PV modules on the western slopes.</p> <p>The Applicant suggested that public benefits could be achieved via a permissive path to Knowl Hill providing access to a historic designed viewpoint towards Claydon House.</p>
15 October 2024	Teams Meeting Online	<p>Updated layout of the Proposed Development prepared for consultation was shared by The Applicant.</p> <p>National Trust raised concerns about the location of the Collector Compound in Field B10 and impact on</p>

Claydon House. The scale of proposed buildings was shared by the Applicant.

Discussion related to land under a National Trust restrictive covenant which had been identified to the south of Claydon Registered Park and Garden. This is a permanent legal constraint which aims to protect and preserve the historic architecture and character of the area covered and conveys a presumption against change. Anyone wishing to alter the appearance of the land or the buildings needs to apply for permission from the National Trust.

23 October 2024	Teams Meeting Online	Discussions with the National Trust and Historic England on settings impact on Claydon House.
		The Applicant shared the virtual 3D computer generated model of the Proposed Development. This allowed the Proposed Development to be visualised and views examined in 'real time' with and without mitigation planting for Fields B11 and B17 around Knowl Hill.
5 February 2025	Teams Meeting Online	Discussion on the wording of the Claydon House restrictive covenant and whether it would be triggered by the construction of the access track and cabling between Parcel 1 and Parcel 2. National Trust confirmed that the covenant was likely to be triggered by this work and requested further details of the proposals are submitted to the National Trust's London & South East Regional Covenants Board, which sits once a month.
		An application for covenant consent has been submitted for the Proposed Development outwith the DCO process.
26 March 2025	Onsite Meeting	On-site meeting with National Trust and Historic England on settings impact on Claydon House.
		Review of proposed Interconnecting Cable Corridor and proposed Internal Access Corridor within Covenanted land.
		An application for covenants consent has been submitted for the Proposed Development outwith the DCO process. The DCO Application can include powers to remove covenant if required.

28 November 2025	Teams Meeting Online	Review of application documents and discussions with the National Trust on their remaining concerns, particularly related to Claydon House.
16 December 2025	Teams Meeting Online	Discussion of National Trust's key areas of concern and review of viewpoints from Parcel 1 and Claydon House
26 January 2026	Email Correspondence	Agreed locations for photography from upper floors of Claydon House
2 February 2026	Teams Meeting Online	Discussion of access to Claydon House for photography, traffic routeing and response to Relevant Representation [RR-270]
25 February 2026	Teams Meeting Online	Discussion of photos taken from 1st and 2nd floor of Claydon House and expected timeline for creation of photomontages. Discussed Statement of Common Ground, in particular construction traffic and covenant topics

4. Current Position

4.1. Position of the Applicant and National Trust

- 4.1.1. The following tables set out the position of the Applicant and National Trust, 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.
- 4.1.3. 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 2 – Position of the Applicant and the National Trust

Ref	Description of Matter	National Trust Comment	Applicant's Response	Status
1	Claydon House and Registered Park and Garden – Effects during Construction and Decommissioning	The National Trust is content with the conclusions of the assessment in respect of changes to the setting of Claydon House and the Registered Park and Garden during Construction and Decommissioning.	The Applicant is pleased to have reached agreement with the National Trust on this matter.	Agreed
2	Upper Floors of Claydon House	The National Trust have requested further detail on the assessment of the upper floors of Claydon House.	The Applicant considers that the use of 3D model and reference to the existing photomontages presented in Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4] [APP-106] has adequately informed the assessment. The Applicant has gained access to the upper floors of Claydon House and undertaken photography in order to provide the requested views and will continue to liaise with Historic England and The National Trust on this matter once the photomontages are available. The two locations for additional visualisations/photomontages have been agreed with National Trust and Historic England.	Under Discussion Low
3	Mitigation Measures	<p>The National Trust has requested further mitigation measures (further planting) to screen the Solar PV modules and Satellite Collector Compound to reduce the visual effects on Claydon House during the operational phase.</p> <p>Further mitigation may be required following a review of the additional photomontages being undertaken. The photomontages should include the proposed infrastructure (solar array and compound) and the proposed tree planting (poplars) along Three Points Lane in winter months.</p> <p>The National Trust have requested that the satellite collector compound be treated like an agricultural building, using profiled steel cladding with a fibre cement roof in dark grey. The applicant has confirmed that although the precise details would be determined at the detailed design stage, the proposed structures would be grey or green and sensitive to the local environment (D16, Design Commitments – AS18). This is acceptable in principle; however, the overall finish needs to be carefully considered at the detailed design stage and our initial comments taken on board.</p>	<p>The siting zone for the Collector Compound in Field B23 has been refined to minimise visibility from Claydon House (including from the upper floors).</p> <p>Embedded mitigation measures already proposed soften and partially screen views of solar PV modules and the satellite collector compound from Claydon House include infill hedgerow and tree planting along Three Points Lane and new hedgerow (advanced) planting along the eastern boundary in Field B22 and north of Field B23 (North). This is secured by the Outline Landscape and Ecological Management Plan [EN010158/APP/7.6.2].</p> <p>While the exact colours and materials to be used on the exterior of the Satellite Collector Compounds would be determined at the detailed design stage, ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] outlines that these would be grey or painted in colour and rendered to suit local building styles. These are secured in the Design Commitments [EN010158/APP/5.9.3].</p> <p>Additional solar PV modules were removed from Fields B11 and B10 to mitigate the visual impacts of panels on Knowl Hill as it was deemed that an additional hedgerow in this location was not consistent with historic hedgerow pattern or the designed landscape as viewed from Claydon House.</p> <p>The Applicant has gained access to the upper floors of Claydon House and undertaken photography in order to provide the requested views and will continue to liaise with Historic England and The National Trust on this matter once the photomontages are available. The two locations for additional visualisations/photomontages have been agreed with National Trust and Historic England. The photomontages will include all the proposed infrastructure and proposed tree planting along Three Points Lane.</p>	Under Discussion Low

<p>4 Construction Traffic</p>	<p>The National Trust is concerned that the forecast increase in traffic along the approach roads would cause traffic congestion and disruption to visitors travelling to and from Claydon House. It may also discourage visitors from coming to Claydon with a consequential loss of revenue to the Trust.</p> <p>The National Trust request an inclusion to the Outline CTMP for the Applicant and the National Trust to discuss and agree arrangements to minimise the day-to-day disruption to visitors and staff travelling to and from Claydon House.</p> <p>The National Trust continue to advocate that the Principal Contractor must liaise with the Operation team at Claydon House as well as the host authority to establish events at Claydon House and be notified of HGV movements within the immediate area. The Outline CTMP should include reference to Claydon House as a major visitor destination close to the DCO Limits and construction traffic routes.</p>	<p>The National Trust's recommended access route for Claydon House from the A41 is not used by construction traffic as noted in ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]. As such, there would be minimal impact to visitors using the signposted route and traffic levels would not lead to congestion to Claydon House during peak periods for this property.</p> <p>Claydon Road would experience a total traffic increase of less than 30% (23.68%), which is not significant in EIA terms, as noted in ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].</p> <p>The Outline Construction Traffic Management Plan [EN010158/APP/7.5.2] includes provision for the Principal Contractor to liaise with the host authority to prepare a diary of local community events (including events at Claydon House). Where possible, HGV traffic flows would avoid moving on these days. The Applicant has updated the Outline Construction Traffic Management Plan [EN010158/APP/7.5.2] at Deadline 1 to confirm that any events at Claydon House would be included in the events diary and the Applicant would engage with the operations team at Claydon House in relation to any events. Accordingly, the Applicant considers that the inclusion of a National Trust representative on the traffic group is not necessary.</p>	<p>Under Discussion</p> <p>Low</p>
<p>5 Claydon House restrictive covenant</p>	<p>The proposed interconnecting cable route between Parcel 1 and 2 forms part of the covenanted land. The covenant stipulations restrict any works to the land, the construction of new buildings or other erections and also works to trees on the covenanted land without the prior written consent of the National Trust. The National Trust has formally confirmed that it has no objection to the proposed works on the land subject to covenant.</p> <p>In addition to the letter of comfort, a letter dated 23rd September 2025 states that the National Trust grants consent for the construction of the proposed access track on the covenanted land. However, this was subject to a number of conditions including details of surfacing materials to be approved by the National Trust. A</p>	<p>The Applicant notes the lack of objection to the works on land subject to a restrictive covenant and this has been detailed in the Letter of Covenant agreement and conditions provided in Appendix 1 and 2 respectively, of this Statement of Common Ground.</p>	<p>Agreed</p>

signed copy of this letter needs to be submitted to the Planning Inspectorate.

6 Landscape management

Concerns over the risk that the existing hedgerows, if left untrimmed, could be vulnerable to Dutch elm disease and if this happens would provide no screening for considerable amount of time.

Hedgerows will be managed in line with the measures set out and secured in the **Outline LEMP [EN010158/APP/7.6.2]**. Proposals are for the gradual increase in height of hedgerows to maintain structure and vigour of plants and resistance to disease, such as Dutch elm disease. In particular, growth rates will be limited to 150mm per annum and the maximum heights of hedgerows has been reduced from 4m to a maximum of 3.5m. In each instance, hedgerows would only be grown as tall as required to screen infrastructure at each location with heights generally between 3-3.5m.

Agreed

Signatures

This statement of Common Ground is agreed upon:

On behalf of National Trust

Name:

Signature:

Date:

On behalf of the Applicant

Name:

Signature:

Date:

Appendix 1 - Letter of Covenant agreement



BY E-MAIL ONLY

The Planning Inspectorate

Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

10 December 2025

Dear Planning Inspectorate

**APPLICATION REFERENCE EN010158
ROSEFIELD SOLAR FARM AND INTERESTS HELD BY THE NATIONAL TRUST**

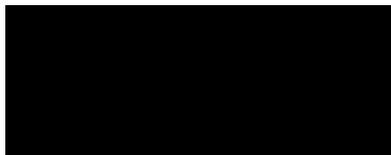
This letter documents the position of Rosefield Energyfarm Limited (the 'Applicant') and the National Trust for Places of Historic Interest or Natural Beauty (the 'National Trust') in respect of the Development Consent Order ('DCO') for Rosefield Solar Farm (the 'Proposed Development') and its interactions with overlapping land interests held by the National Trust.

The Applicant and the National Trust acknowledge and agree that pursuant to a conveyance dated 13 July 1956, the National Trust has the benefit of restrictive covenants in the Order land over plots 3/14, 3/15, 3/16, 3/17, 3/18 and 4/1 as identified in the Land Plans and Book of Reference accompanying the DCO application. In this location the Proposed Development would comprise Work No. 7 comprising works to lay 132kV electrical cables and laying down of internal access track.

The Parties agree that the benefit of the restrictive covenants over plots 3/14, 3/15, 3/16, 3/17, 3/18 and 4/1 are not interests held by the National Trust inalienably and therefore do not fall within the scope of section 130 of the Planning Act 2008. The National Trust also confirms that it has no objection to the Proposed Development within these plots, on the basis that all works on these plots will be undertaken in accordance with an approved management plan under the DCO and subject to the land being restored to its original condition once the relevant works are completed.

The National Trust continues to engage with the Applicant on the potential impact of the Proposed Development on the heritage assets in the National Trust's ownership at The Claydon Estate. These matters will be reported in a Statement of Common Ground between the parties and submitted in Examination.

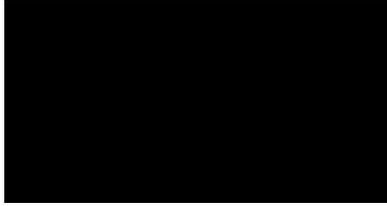
Signed



The National Trust for Places of Historic Interest or Natural Beauty



Rosefield Energyfarm Limited



Appendix 2 - Letter of Covenant conditions





**National
Trust**

The Claydon Estate,
Estate Office,
Claydon Park,
Middle Claydon,
Buckingham,
Buckinghamshire MK18 2EX

c/o EDF Power Solutions

Dear [REDACTED],

Re: Proposals for a solar farm on land at Claydon

Thank you for your application. As you are aware, the land is subject to a restrictive covenant dated July 13th 1956 between (1) [REDACTED], (2) Four Claydons Estate Company Limited and (3) The National Trust for Places of Historic Interest or Natural Beauty. You have submitted the following documents as part of a formal application for the construction of an agricultural track across covenanted land to the south of Claydon to support the construction of a solar farm on non-covenanted, non-NT land.:-

Figure 3.5_Zonal_Masterplan
Rosefield_Meeting_Note_NT Covenants 26032025
RSFD-05-DR-00068_Overall cable route - NT covenant land
wettransfer_nt-requested-covenant-images_2025-06-09_0848

The application was presented to the August meeting of the Regional Covenants Board.

I am writing now to confirm that the National Trust hereby grants consent for the construction of the proposed access track to be carried out on the covenanted land subject to the details of the surfacing materials to be approved by the National Trust.

National Trust
London and South East
Hughenden Regional Office
Hughenden
High Wycombe
Buckinghamshire
HP14 4LA
www.nationaltrust.org.uk

Patron: His Majesty The King
Regional Chair: [REDACTED]
Regional Director: [REDACTED]
Registered office:
Heelis, Kemble Drive, Swindon
Wiltshire SN2 2NA
Registered charity number 205846

If any trees or hedges are affected by the works, the covenant may also be engaged and therefore we would be grateful to receive further information detailing any proposed works to trees if relevant.

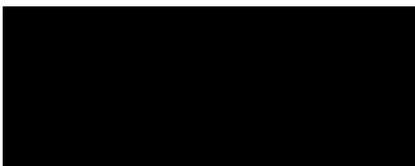
The above consents are subject to the following conditions:

1. The Works will be carried out solely in accordance with the details and specifications previously approved by the Trust.
2. No variation or departure from the Works described and shown in the said drawings, and in the technical specifications thereon, are to be permitted.
3. A right, on prior written notice, to enter on the property during the period of execution of the works and after completion in order to inspect the works.
4. You are obliged to seek all or any other statutory or planning permissions where required.
5. Save for the above relaxation, the terms and conditions of the Covenants continue to apply to the Property.

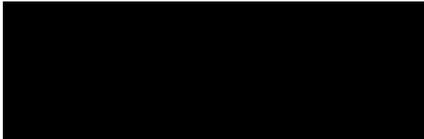
For the avoidance of doubt this consent is conditional upon receipt of the copy of this letter signed by the registered land owner and returned to the National Trust. If the signatory is not the registered land owner, we would ask that written consent is provided from the registered land owner that the signatory is permitted to sign on their behalf.

Please don't hesitate to contact me if you have any further questions.

Yours sincerely



Covenants Officer

I,  to the terms and conditions set out in this consent letter.
Signe 

Cont/d



rosefieldsolarfarm.co.uk