

Rosefield Energyfarm Limited  
Alexander House  
1 Mandarin Road  
Rainton Bridge Business Park  
Sunderland  
DH4 5RA

Rebecca Luxton  
Case Manager  
The Planning Inspectorate  
c/o QUADIANT  
69 Buckingham Avenue  
Slough  
SL1 4PN

10 March 2026

Dear Rebecca,

**Application by Rosefield Energyfarm Limited: Rosefield Solar Farm  
(Application Reference: EN010158)**

**Deadline 1 Submissions**

On behalf of Rosefield Energyfarm Limited (the 'Applicant') and further to the publication of the Rule 6 letter [\[PD-008\]](#) on 27 January 2026 and the Rule 8 letter [\[PD-009\]](#) on 27 February 2026, we write to provide the Applicant's written submissions for Deadline 1 of the Rosefield Solar Farm Development Consent Order (DCO) Examination.

**Appendix 1** of this letter provides an overview of the documents submitted by the Applicant at Deadline 1. **Table 1** comprises the application documents for which updated versions are being submitted and summarises the reasons why each document has been updated. Each updated document has been submitted with both clean and tracked change versions to aid the Examining Authority (the 'ExA') in identifying the changes made. The exceptions to this are updates to Figures within the **Environmental Statement [EN010158/APP/6.1 – 6.4]** and updates to the Plans submitted as Part 2 of the DCO Application. In these instances, a Revisions Schedule has been provided alongside each update for clarity.

**Table 2** comprises the new documents being submitted which were requested by the ExA in the Rule 6 and 8 letters to be provided by the Applicant at Deadline 1.

**Appendix 2 of this letter** contains relevant correspondence with the Environment Agency and the Buckingham & River Ouzel Internal Drainage Board, in relation to the modification and disapplication of statutory provisions included within Article 6 of the **Draft Development Consent Order [EN010158/APP/3.1.3]** as submitted at Deadline 1.

We trust that this is useful and please do not hesitate to contact us if you require any further information.

Yours sincerely,

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Project Development Manager

On behalf of Rosefield Energyfarm Limited

## Appendix 1 – List of documents submitted by the Applicant at Deadline 1

Table 1 – Revised Documents

Doc Ref.	Rev No.	Document Name	Reason for Submission
<b>Revised Documents</b>			
1.2.6	6	Guide to the Application	To provide an up-to-date list of the status of application documents and to identify where any have been superseded.
2.2.3	3	Land Plans	To show that no interests or rights will be sought on land that is currently in use by Anglian Water Services Limited for a water pump and to update text on the Key Sheet to reflect Action Point 1 from the Compulsory Acquisition 1 Hearing (CAH1).
2.3.3	3	Works Plans	To reduce the extent of the Grid Connection Cabling Corridor by removing land currently in use by Anglian Water Services Limited for a water pump.
2.4.3	3	Streets, Rights of Way and Access Plans	Correction to stopped up Public Right of Way (PRoW) in the vicinity of Pond Farm as set out by Buckinghamshire Council in their Relevant Representation.
2.6.3	3	Illustrative Layout Plans and Sections	Correction to stopped up PRoW in the vicinity of Pond Farm in their Relevant Representation.
3.1.3	3	Draft Development Consent Order (DCO)	To respond to the Relevant Representations received from the Environment Agency, Anglian Water Services Limited and Buckinghamshire Council, to update the disapplication and modification of statutory provisions article following agreement with the Environment Agency, to include a more specific reference to operational noise limits, and to

Doc Ref.	Rev No.	Document Name	Reason for Submission
			reflect the correction to the <b>Streets, Rights of Way and Access Plans [EN010158/APP/2.4.3]</b> .
4.1.3	3	Statement of Reasons	To reflect the update made to the <b>Land Plans [EN010158/APP/2.2.3]</b> .
4.3.2	2	Book of Reference	To update the document in response to Land Interest Questionnaires and correspondence received, as well as to remove interests where they are no longer required or the interest no longer exists.
5.5.2	2	Schedule of Other Consents and Licences	To respond to the Relevant Representation received from the Environment Agency.
5.7.3	3	Planning Statement	To correct a reference to a design commitment and in response to the Relevant Representation received from Buckinghamshire Council.
5.8.2	2	Design Approach Document	To correct minor typographical errors and in response to Relevant Representations.
5.9.3	3	Design Commitments	To update design commitments in response to comments from Interested Parties including Natural England and the Environment Agency.
5.12.2	2	Draft SoCG with UKHSA	Updated draft agreed with SoCG party and submitted to provide the ExA with an overview of discussions.
6.1.2	2	ES Chapter 3: Proposed Development Description	To respond to the Relevant Representation received from Buckinghamshire Council.
6.2.2	2	ES Chapter 7: Biodiversity	To respond to the Relevant Representation received from the Environment Agency.

Doc Ref.	Rev No.	Document Name	Reason for Submission
6.2.2	2	ES Chapter 11: Land and Groundwater	To respond to the Relevant Representation received from the Environment Agency.
6.2.2	2	ES Chapter 13: Noise and Vibration	To respond to the Relevant Representations received from Buckinghamshire Council and other Interested Parties.
6.2.2	2	ES Chapter 16: Water	To respond to the Relevant Representation received from the Environment Agency.
6.2.2	2	ES Chapter 17: Cumulative Effects	To consider further existing and/or approved developments which, in combination with the Proposed Development, have the potential to result in significant inter-project cumulative effects.
6.3.2	2	ES Figure 3.7: Indicative Cable Crossings and Cable Corridors	Correction of an item in the key.
6.3.2	2	ES Figure 3.10: Existing and Proposed PRoW and Permissive Footpaths	Correction to stopped up PRoW in the vicinity of Pond Farm as set out by Buckinghamshire Council in their Relevant Representation.
6.3.2	2	ES Figure 11.3: Sensitive receptors relating to groundwater	To add a groundwater dependent terrestrial ecosystem to the drawing.
6.3.2	2	ES Figure 13.1: Study Area and Receptors	Update to receptor labelling for consistency with other figures.
6.3.2	2	ES Figure 17.2: Cumulative Short List Radius	Update to include new projects included in the cumulative short list
6.3.2	2	ES Figure 17.8a: Cumulative ZTV – Littleton Manor Farm – Bare Earth	Update to reduce the proposed turbine height at Littleton Manor Farm.
6.3.2	2	ES Figure 17.8b: Cumulative ZTV –	Update to reduce the proposed turbine height at Littleton Manor Farm.

Doc Ref.	Rev No.	Document Name	Reason for Submission
		Littleton Manor Farm - Screening	
6.3.2	2	ES Figure 17.9a: Cumulative ZTV – All Cumulative Sites – Bare Earth	Update to include new projects included in the cumulative long list.
6.3.2	2	ES Figure 17.9b: Cumulative ZTV – All Cumulative Sites - Screening	Update to include new projects included in the cumulative long list.
6.4.2	2	ES Appendix 5.5: Health and Wellbeing Summary Statement	To include a Health and Wellbeing Assessment at Annex A in response to the Relevant Representations received from Buckinghamshire Council and Marsh Gibbon Parish Council, and in response to the Examining Authority's Request for Further Information under the Section 89(3) letter dated 9 January 2026.
6.4.2	2	ES Appendix 7.11: Wintering Bird Survey Report (2024)	To respond to the Relevant Representation received from East Claydon Parish Council.
6.4.2	2	ES Appendix 7.14: Bat Preliminary Roost Assessment Report (2025)	To amend minor errors in tree species identification.
6.4.2	2	ES Appendix 7.17: Biodiversity Net Gain Assessment	To respond to the Relevant Representation received from the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust.
6.4.2	2	ES Appendix 9.2: Geophysical Survey Report	To respond to the Relevant Representation received from Buckinghamshire Council.
6.4	1	ES Appendix 10.6: LVIA Visualisations Summer Photosheets	To add additional summer photography visualisations.

Doc Ref.	Rev No.	Document Name	Reason for Submission
6.4.2	2	ES Appendix 11.1: Preliminary Risk Assessment (Part 1)	To respond to the Relevant Representation received from the Environment Agency.
6.4.2	2	ES Appendix 13.3: Operational Phase Assessment Details	To respond to Relevant Representations received from Buckinghamshire Council and the community.
6.4.2	2	ES Appendix 16.2: WFD Waterbodies Stage 1 Screening Assessment	To respond to the Relevant Representation received from the Environment Agency.
6.4.2	2	ES Appendix 17.1: Long List of Other Approved and or Existing Developments	Update to include new projects included in the cumulative long list.
6.4.2	2	ES Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment	To consider further existing and/or approved developments which, in combination with the Proposed Development, have the potential to result in significant inter-project cumulative effects.
6.4.2	2	Commitments Register	To respond to the Relevant Representation received from the Environment Agency.
7.2.2	2	Outline Construction Environmental Management Plan	To respond to the Relevant Representations received from Buckinghamshire Council, Natural England and the Environment Agency. In addition, to respond to communications with Preston Farms Ltd and TCS Biosciences Ltd and address Action Point 5 of CAH1.
7.2.2	2	Outline Construction Environmental Management Plan, Appendix 1: Outline Site Waste Management Plan	To respond to the Relevant Representation received from the Environment Agency.

Doc Ref.	Rev No.	Document Name	Reason for Submission
7.3.2	2	Outline Operational Environmental Management Plan	To respond to the Relevant Representations received from Buckinghamshire Council, the Environment Agency and Historic England. In addition, to respond to communications with Preston Farms Ltd and TCS Biosciences Ltd and address Action Point 5 of CAH1.
7.4.2	2	Outline Decommissioning Environmental Management Plan	To respond to the Relevant Representations received from Buckinghamshire Council, the Environment Agency and Historic England. In addition, to respond to communications with Preston Farms Ltd and TCS Biosciences Ltd and address Action Point 5 of CAH1.
7.5.2	2	Outline Construction Traffic Management Plan	To respond to the Relevant Representation received from the Environment Agency and address Action Point 5 of CAH1.
7.6.2	2	Outline Landscape and Ecological Management Plan	To respond to the Relevant Representations received from Buckinghamshire Council, Natural England, the Environment Agency and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).
7.6.2	2	Outline Landscape and Ecological Management Plan, Appendix 1: Green and Blue Infrastructure Parameters	Correction to stopped up PRow in the vicinity of Pond Farm as set out by Buckinghamshire Council in their Relevant Representation.
7.6.2	2	Outline Landscape and Ecological Management Plan, Appendix 2: Landscape and Ecological Mitigation and Enhancements	Correction to stopped up PRow in the vicinity of Pond Farm as set out by Buckinghamshire Council in their Relevant Representation.

Doc Ref.	Rev No.	Document Name	Reason for Submission
7.6.2	1	Outline Landscape and Ecological Management Plan, Appendix 5: Green and Blue Infrastructure Parameters – Buffer Widths	New appendix to respond to the Relevant Representation received from Natural England.
7.7.2	2	Outline Soil Management Plan	To respond to the Relevant Representation received from Buckinghamshire Council.
7.8.2	2	Outline Rights of Way and Access Strategy	To correct a PRoW proposal shown in the vicinity of Pond Farm and other clarifications in response to the Relevant Representation received from Buckinghamshire Council.
7.9.2	2	Outline Battery Safety Management Plan	To respond to the Relevant Representation received from the Environment Agency.
7.10.2	2	Draft Archaeological Management Strategy	To respond to the Relevant Representations received from Buckinghamshire Council and Claydon Solar Action Group.
7.11.2	2	Outline Drainage Strategy	To respond to the Relevant Representations received from Buckinghamshire Council, Anglian Water Services Ltd and the Environment Agency.
7.13.2	2	BESS Plume Assessment Summary	To respond to the Relevant Representation received from the UK Health Security Agency, including a new appendix to provide additional Atmospheric Dispersion Modelling.
7.14.2	2	Outline Employment, Skills and Supply Chain Plan	To respond to the Relevant Representation received from Buckinghamshire Council to include the decommissioning phase.
8.1.2	2	Schedule of Changes to the Draft DCO	To reflect the updates to the <b>Draft DCO [EN010158/APP/3.1.3]</b> .

Table 2 – New Documents

Doc Ref.	Rev No.	Document Name	Reason for Submission
5.13	1	Statement of Commonality	To summarise the positions on the Statements of Common Ground between the Applicant and various Interested Parties.
5.14	1	Draft SoCG with Natural England	Draft agreed with SoCG party and submitted to provide the ExA with an overview of discussions.
5.15	1	Draft SoCG with Environment Agency	Draft agreed with SoCG party and submitted to provide the ExA with an overview of discussions.
5.16	1	Draft SoCG with Historic England	Draft agreed with SoCG party and submitted to provide the ExA with an overview of discussions.
5.17	1	Draft SoCG with National Trust	Draft agreed with SoCG party and submitted to provide the ExA with an overview of discussions.
5.18	1	Draft SoCG with Anglian Water Services Limited	Draft agreed with SoCG party and submitted to provide the ExA with an overview of discussions.
5.19	1	Draft SoCG with High Speed 2 Limited	Draft agreed with SoCG party and submitted to provide the ExA with an overview of discussions.
5.20	1	Draft SoCG with National Grid Electricity Transmission plc	Draft agreed with SoCG party and submitted to provide the ExA with an overview of discussions.
5.21	1	Draft SoCG with National Highways	Draft agreed with SoCG party and submitted to provide the ExA with an overview of discussions.
5.22	1	Draft SoCG with Buckinghamshire Council	Draft agreed with SoCG party and submitted to provide the ExA with an overview of discussions.
8.4	1	Examination Progress Tracker	To respond to the Examining Authority's ('ExA's') Rule 6 letter dated 27 January 2026.

Doc Ref.	Rev No.	Document Name	Reason for Submission
8.5	1	Bat Technical Study	To respond to the Relevant Representation received from Natural England.
8.6	1	Written Summary of Applicant's Oral Submissions at Open Floor Hearing 1 (OFH1)	To summarise the oral submissions made by the Applicant at OFH1 on 24 February 2026.
8.7	1	Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1)	To summarise the oral submissions made by the Applicant at CAH1 on 25 February 2026. The Applicant's response to action points from CAH1 are included in this document.
8.8	1	Land and Rights Negotiations Tracker	To respond to the Examining Authority's ('ExA's') Rule 6 letter dated 27 January 2026.
8.9	1	Status of Negotiations with Statutory Undertakers	To respond to the Examining Authority's ('ExA's') Rule 6 letter dated 27 January 2026.
8.10	1	Applicant's Draft Itinerary for the Accompanied Site Inspection (ASI)	To respond to the Examining Authority's ('ExA's') Rule 6 letter dated 27 January 2026.

## **Appendix 2 - Correspondence with the Environment Agency and the Buckingham & River Ouzel Internal Drainage Board**

# BUCKINGHAM & RIVER OUZEL INTERNAL DRAINAGE BOARD

Vale House  
Broadmead Road  
Stewartby  
BEDFORD  
MK43 9ND

Tel: 01234 767995

Email: [planning@idbs.org.uk](mailto:planning@idbs.org.uk)

Website: [www.idbs.org.uk](http://www.idbs.org.uk)

25 September 2025

Rosefield Solar Farm  
Cardinal Place  
80 Victoria Street  
London  
SW1E 5JL

## BY E-MAIL ONLY

For the attention of: [REDACTED], Project Development Manager  
Reference: **Rosefield Solar Farm Development Consent Order (DCO) Application**

Dear [REDACTED]

Thank you for your letter of 17<sup>th</sup> September 2025 where you indicated acceptance of our Land Drainage consenting charging proposals, commensurate with your Development Consent Order (DCO) for the above site. In response, I confirm that the Buckingham & River Ouzel Internal Drainage Board accepts the following dis-applications related to the above DCO:

- a. Section 23 (prohibition of obstructions, etc. in watercourses) of the Land Drainage Act 1991;
- b. Section 32 (variation of awards) of the Land Drainage Act 1991;
- c. The provisions of any byelaws made under section 66 (powers to make byelaws) of the Land Drainage Act 1991;
- d. The provisions of any byelaws made under, or having effect as if made under, paragraphs 5, 6 or 6A of Schedule 25 (byelaw making powers of the authority) to the Water Resources Act 1991;
- e. Section 118 (consent request for discharge of trade effluent into public sewer) of the Water Industry Act 1991.

Please direct any reply to Scott Brewster at the Board's offices.

[REDACTED]  
Senior Engineer  
[REDACTED]@idbs.org.uk

[Redacted]

**From:** [Redacted]  
**Sent:** [Redacted]  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** A Protective Provisions and disapplication of legislation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

[Redacted]

Many thanks for the update and for the amends to Article 6 of the dDCO as detailed below.

Kind regards,

[Redacted]

**From 1 April 2024** the Environment Agency will be implementing new legislative powers to recover its costs for all stages of the Nationally Significant Infrastructure Project (NSIP) consenting regime. Please contact us for details for what this means for your existing or proposed NSIP.

Join our new [Viva Engage](#) community for discussions on Nationally Significant Infrastructure Projects



**From** [Redacted]  
**Se** [Redacted]  
**T** [Redacted]  
**C** [Redacted]  
**Su** [Redacted]

[Redacted]

Thank you for coming back to us.

Our client agrees with your view that no flood risks permits are needed for the project. We note we've obtained the IDB's consent to the disapplications as relevant including to s.23 (ordinary watercourses).

On the basis of the EA's position, we will amend Article 6 of the dDCO to remove the relevant references given EA consent is not needed.

[Redacted] regards

\*\*\*\*\*

**Disapplication and modification of statutory provisions**

6.—(1) The following provisions do not apply in relation to the construction of any work or the carrying out of any operation required for the purposes of, or in connection with, the construction, operation, maintenance or decommissioning of any part of the authorised development—

- a) section 23 (prohibition of obstructions, etc. in watercourses) of the Land Drainage Act 1991(a);
- b) section 32 (variation of awards)(b) of the Land Drainage Act 1991;
- c) the provisions of any byelaws made under section 66(c) (powers to make byelaws) of the Land Drainage Act 1991;
- d) ~~the provisions of any byelaws made under, or having effect as if made under, paragraphs 5, 6 or 6A of Schedule 25 (byelaw making powers of the authority) to the Water Resources Act 1991(d);~~
- e) section 118 (consent request for discharge of trade effluent into public sewer) of the Water Industry Act 1991;
- f) ~~regulation 12 (requirement for environmental permit) of the Environmental Permitting (England and Wales) Regulations 2016(e) in respect of a flood risk activity only;~~
- g) the legislation listed in Schedule 3 (legislation to be disappplied) in so far as the provisions still in force are incompatible with the powers contained within this Order; and
- h) the provisions of the Neighbourhood Planning Act 2017(f) insofar as they relate to the temporary possession of land under articles 31 (temporary use of land for constructing the authorised development) and 32 (temporary use of land for maintaining the authorised development) of this Order.

[Redacted]

Qualified: Australia - Victoria

[Redacted]

For Pinsent Masons LLP

Pinsent Masons supports agile working, so please don't feel you need to respond to this email outside your working hours.



A purpose-led professional services business with law at the core

[Redacted]

[Redacted] tion of legislation

[Redacted]

Thank you for providing additional information and apologies for the delay responding to you.

As the development does not impact statutory main rivers or flood zones associated with main rivers, the Applicant is not required to apply for, or seek disapplication of, flood risk activity permits (FRAPs), and Environment Agency Protective Provisions are not required in the DCO.

We recommend the Applicant seeks ordinary watercourse consent from the Local Lead Flood Authority (LLFA).

Kind regards,

[Redacted]