

Richard Morgan –
Lead Member of the
Examining Authority

Our ref: OR-0002180/01

Your ref: EN010158

Interested Party ref: [REDACTED]

Date: 22 April 2026

Planning Inspectorate
[via PINS portal]

Dear Richard,

Rosefield Solar Farm – Development Consent Order (DCO) Application

Examination Deadline 2 (22 April 2026)

Environment Agency Response

This letter constitutes the Environment Agency's Deadline 2 response to the above mentioned DCO application.

Responses to Examining Authority's (ExA's) first written questions (ExQ1)

We provide our responses to ExQ1 in Appendix 1.

Comments on further information received at Deadline 1

We have reviewed the documents submitted by the Applicant at Deadline 1 and updated our comments on matters raised in the draft Statement of Common Ground (SoCG). We provide our updated position on such matters in Appendix 2 (overall position) and Appendix 3 (position on individual issues).

We are satisfied with the Applicant's continued engagement with us and believe it is likely that all matters which remain under discussion can be resolved by the close of the examination.

Comments on the Applicant's revised draft Development Consent Order (dDCO)

Following discussion with the Applicant's legal team, we maintain our position regarding the use of 'substantially' in DCO requirements. 'Substantially' undermines the enforceability of proposals and/ or may erode the environmental protections put in place. The overarching management plans provide a large scope for the detail to

be provided later, and the Rochdale envelope applies – thus flexibility is built into the process.

To resolve this matter, the terms ‘substantially’ needs to be removed from the requirements whereby the Environment Agency is listed as a consultee.

Our position on this matter, as set out above, is stated within the updated draft SoCG (see Ref 7.2) to be submitted by the Applicant at Deadline 2.

Further information requested by the ExA – artificial intelligence (AI)

We confirm that AI has not been used in any of our examination submissions to date.

We trust this advice is useful.

Yours sincerely,


Planning Advisor – National Infrastructure Team

e-mail: NITeam@environment-agency.gov.uk

Appendix 1 – Environment Agency responses to ExQ1

Question Number	Question to	Question	Environment Agency (EA) comments
Q.1.1.6	The applicant All other interested parties	Solar Roadmap 2025 The applicant and all interested parties are invited to make comments or representations about the Solar Roadmap 2025 and its applicability and implications for the proposed development.	No comment.
Q1.7.1	Natural England, Buckinghamshire Council, Environment Agency, Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT), Claydons Solar Action Group (CSAG)	General - review of deadline 1 documents Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.	The following EA Issue IDs presented in our Relevant Representations [RR-081] relating to biodiversity matters have been resolved in the Applicant's responses or amended documents submitted at Deadline 1: EA24, EA25. The following issue, which derives from EA Issue IDs EA26 in our Relevant Representations [RR-081] , is currently unresolved: an assessment of the impact of the proposed bridge upon riparian ecological feature. We are aware that Environmental Statement (ES) Chapter 7: Biodiversity will be updated at Deadline 2 to include this. Following our review of this document, we will update our position in the draft SoCG.

			Our detailed position on this matter is provided under Ref 5.1 in the updated draft SoCG to be submitted by the Applicant at Deadline 2.
Q1.14.1	Environment Agency (EA), Anglian Water Services Limited	<p>Review of deadline 1 documents</p> <p>Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the applicant's responses or amendments have addressed your concerns regarding the impacts on land and groundwater matters. If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.</p>	<p>The following EA Issue IDs presented in our Relevant Representations [RR-081] relating to land and groundwater matters have been resolved in the Applicant's responses or amended documents submitted at Deadline 1: EA11, EA12, EA13, EA15, EA16, EA17, EA19, EA20, EA21, EA22, EA29, EA31, EA33, EA34, EA35, EA38, EA40, EA41.</p> <p>The following EA Issue IDs presented in our Relevant Representations [RR-081] relating to land and groundwater matters are currently unresolved: EA14, EA18, EA23, EA27, EA28, EA30, EA32, EA36, EA37, EA39, EA42. We are aware that updated documents will be submitted at Deadline 2 and we will update our position on each of these matters in the draft SoCG following our review.</p> <p>Our detailed position on these matters is provided in the updated draft SoCG to be submitted by the Applicant at Deadline 2.</p>

<p>Q1.14.7</p>	<p>EA, Natural England, Buckinghamshire Council</p>	<p>Finemere Wood Site of Special Scientific Interest Review the applicant's updates to ES Chapter 11 (Land and Groundwater) [REP1-038] regarding the effects on groundwater dependent terrestrial ecosystems at Finemere Wood Site of Special Scientific Interest – do you agree with the applicant's conclusions regarding the likely effects? If not, why not?</p>	<p>We are satisfied that the details regarding Finemere Wood Site of Special Scientific Interest as a Groundwater Dependent Terrestrial Ecosystem have been adequately detailed in ES Chapter 11 (Land and Groundwater) [REP1-038] paragraphs 11.10.5 and 11.10.6. We have no further comments, and this issue is now resolved as detailed in the updated draft SoCG to be submitted by the Applicant at Deadline 2.</p>
<p>Q1.20.1</p>	<p>Environment Agency (EA), Anglian Water Services Limited</p>	<p>Review of deadline 1 documents Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the applicant's responses or amendments have addressed your concerns regarding the impacts on the water environment. If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.</p>	<p><u>Geomorphology</u> The following EA Issue ID presented in our Relevant Representations [RR-081] regarding the water environment in relation to geomorphology is currently unresolved: EA26. We are aware that updates are to be made in the relevant documents at Deadline 2 and we will update our position in the draft SoCG following our review.</p> <p><u>Biodiversity</u> For outstanding concerns regarding the water environment in relation to biodiversity, please refer to our response to Q1.7.1.</p> <p><u>Ground water and surface water quality</u></p>

			<p>For outstanding concerns regarding the water environment in relation ground water and surface water quality, please refer to our response to Q1.14.1.</p> <p><u>Flood risk</u> For outstanding concerns regarding the water environment in relation to flood risk, please refer to our response to Q1.20.13.</p> <p>Our detailed position on these matters is provided in the updated draft SoCG to be submitted by the Applicant at Deadline 2.</p>
Q1.20.6	EA, Buckinghamshire Council Local Lead Flood Authority (LLFA)	National Policy Statement (NPS) EN-1 Are you satisfied that sufficient information on flood risk management regarding safe access and escape routes as part of an agreed emergency plan has been provided by the applicant, and that any residual risk could be safely managed over the lifetime of the development?	<p>It would be for the Local Planning Authority's Emergency Planners/ local resilience forums to form a view on safe access and egress. If they have concerns, then the EA can advise on hazard rating.</p> <p>There are no areas of residual flood risk which are of a concern to the EA.</p>
Q1.20.7	EA, Buckinghamshire Council LLFA	NPS EN-1 Are you satisfied that the proposed drainage system complies with any National Standards published by Ministers under paragraph 5(1) of schedule 3 of the Flood and Water	<p>In the context of flood risk, it is for the Local Lead Flood Authority (LLFA) to provide bespoke advice on drainage/ surface water. We would therefore defer to the LLFA's position on whether the proposed drainage</p>

		Management Act 2010, including during the construction period?	system complies with any National Standards for all phases of the development.
Q1.20.13	EA	<p>Flood Risk Assessment</p> <p>Provide a view on the updated FRA [PDA-004] and whether you have any outstanding concerns regarding the assessment or flood risk as a result of the proposed development.</p>	<p>We provide the following summary of our view on the updated FRA [PDA-004] and outstanding concerns in relation to the flood risk issues set out in our Relevant Representation Issue IDs [RR-081].</p> <p>We are satisfied that the Applicant has taken a sequential approach to the site layout (Issue IDs: EA02 and EA05) and addressed contradictions in terminology regarding flood risk (EA03). Additionally, the Applicant has committed to providing compensatory flood storage (EA04) which is welcomed and we are awaiting the outline Construction Environmental Management Plan (oCEMP) to be updated accordingly to include this commitment for the design flood event.</p> <p>There are some outstanding issues which we are seeking clarity on from the Applicant. These relate to the freeboard above the design flood level for panel area B1 and ensuring that +600mm is achieved (which derives from EA08), the use of fencing within Flood Zone 3b to ensure the design ensures</p>

			<p>flood flow routes are not inhibited (EA06), the application of an upper climate change allowance to represent the Credible Maximum Scenario (EA07 and EA010), some clarifications regarding the suitability of the Risk of Flooding from Surface Water for informing fluvial flood risk (EA08 and EA09). The Applicant has provided an update on the position with regards to these aspects in the latest updated draft SoCG which is welcomed and positive. We await the updated FRA to be submitted at Deadline 2 before taking an updated view on the outstanding issues.</p> <p>Our detailed position on each of these matters is provided in the updated draft SoCG to be submitted by the Applicant at Deadline 2.</p>
Q1.20.14	EA, Buckinghamshire Council LLFA	<p>Sequential test</p> <p>Do you consider that the applicant has been able to demonstrate that the sequential test has been applied and satisfied as part of the site selection process? Explain your answer.</p>	<p>The EA's remit in this context is to consider whether a sequential approach has been applied to components on the site. This is considered in our Relevant Representations Issue ID: EA02 and EA05 [RR-081]. These issues are resolved for the following reasons:</p> <ul style="list-style-type: none"> • Permanent infrastructure is located within Flood Zone 1 where possible and Design Commitment E1 in Design

			<p>Commitments [REP1-020] secures that Construction Compounds will be located outside of Flood Zone 2 and 3 areas and flood risk from other mapped sources.</p> <ul style="list-style-type: none">• The Applicant has also presented a map showing components relative to Flood Zone 3b in Figure 3.2 of the Flood Risk Assessment [PDA-004]. <p>Our position on these matters is provided in the updated draft SoCG to be submitted by the Applicant at Deadline 2.</p>
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Appendix 2 – Summary of overall Environment Agency position

Key:

Green	Agreed / resolved
Yellow	Working on a solution / under discussion
Red	Not agreed

Subject	Work package	Baseline assessment/ scope / surveys	Impact	Solution	Requirement	Status	EA Relevant Representation Issue ID
Flood Risk & Flood Modelling	Assessment of Flood Risk (ES and FRA)						EA02, EA03, EA04, EA05, EA06, EA07, EA08, EA09, EA10
Groundwater & Contaminated Land	Environmental Statement						EA11, EA12, EA13, EA14, EA15, EA16, EA17, EA18, EA19
	Commitments Register						EA11, EA20
	Construction Environmental Management Plan						EA21, EA22, EA23
	Operational Environmental Management Plan						EA11, EA21, EA23
	Decommissioning Environmental Management Plan						EA11, EA12, EA21, EA23
	Battery Safety Management Plan						EA11, EA23
	Drainage Strategy						EA11, EA13
Biodiversity & Geomorphology	Environmental Statement						EA24, EA25, EA26
	Landscape Ecological Management Plan						EA24, EA25
	Construction Environmental Management Plan						EA25
Water Quality	Development Consent Order						EA01
	Environmental Statement						EA27, EA28, EA29, EA31, EA32, EA34, EA35, EA36, EA37, EA38, EA41, EA42
	Construction Environmental Management Plan						EA28, EA30, EA31, EA32, EA33
	Operational Environmental Management Plan						EA30, EA31, EA33, EA37, EA38, EA39, EA40
	Decommissioning Environmental Management Plan						EA30, EA31, EA33, EA39, EA40
	Battery Safety Management Plan						EA37, EA38

Appendix 3 – Environment Agency position on individual issue IDs as raised in our Relevant Representations

Key:

	Agreed / resolved
	Working on a solution / under discussion
	Not agreed

Issue ID	RAG status
EA01	
EA02	
EA03	
EA04	
EA05	
EA06	
EA07	
EA08	
EA09	
EA10	
EA11	
EA12	
EA13	
EA14	
EA15	
EA16	
EA17	
EA18	
EA19	
EA20	
EA21	
EA22	
EA23	
EA24	
EA25	
EA26	
EA27	
EA28	

EA29	Green
EA30	Yellow
EA31	Green
EA32	Yellow
EA33	Green
EA34	Green
EA35	Green
EA36	Yellow
EA37	Yellow
EA38	Green
EA39	Yellow
EA40	Green
EA41	Green
EA42	Yellow