

Rosefield Solar Farm
~~Draft~~ Statement of Common
Ground – Historic England
(Tracked)

EN010158/APP/5.16.2
~~April~~ March 2026
Deadline 24
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 a final position between both parties ~~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 Historic England (HE).
- 1.2.2. HE is more formally known as the Historic Buildings and Monuments Commission for England. HE is the Government's statutory adviser on all matters relating to the historic environment, and a statutory consultee on all Nationally Significant Infrastructure Projects. HE has a duty to promote conservation, public understanding and enjoyment of the historic environment.
- 1.2.3. The issues discussed with HE are detailed in **Section 4** of this SoCG.
- 1.2.4. HE is listed as a prescribed consultee in Schedule 1 of the Infrastructure Planning (Application: Prescribed Forms and Procedure) Regulations 2009¹ and so has been consulted during the preparation of the DCO Application.
- 1.2.5. Collectively, the Applicant and HE are referred to as 'the parties'.

1.3. Purpose of this Document

- 1.3.1. This 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 and~~

¹ <https://www.legislation.gov.uk/ukxi/2009/2264/schedule/1/made>

~~resubmitted as the examination progresses in order to enable a final version to be submitted to the Examining Authority. final position between both parties.~~

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 ('MHCLG Guidance')².

1.3.3. Paragraph 007 of the MHCLG 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 HE 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 HE.~~

~~1.3.6.~~ 1.3.5. 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.~~ 1.3.6. The SoCG does not seek to replicate information which is available elsewhere within the DCO Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate's website (<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010158/documents>).

~~1.3.8.~~ 1.3.7. ~~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. This final SoCG has been 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.~~ 1.3.8. For the purposes of examination, this SoCG addresses the following key topic areas.




- Assessment methodology; and

² Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (30 April 2024).

- Designated heritage assets;
- ~~Non-designated heritage assets; and~~
- ~~Below ground archaeology.~~

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 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] [REP1-005]**, the **Design Commitments [EN010158/APP/5.9.43]** and the requirements set out in the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.34]**.
- 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 **ES 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 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 HE in relation to the DCO Application.

3.1.2. A detailed breakdown of engagement ~~prior to submission of the~~ that has been undertaken pre-submission of the DCO Application is provided in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] [APP-052]**.

Table 1 - Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
5 February 2024	Teams Meeting Online	<ul style="list-style-type: none"> - Photomontages from outside Claydon House - Designated scheduled monument of Preceptory of Knights - Request for Waddesdon Manor and Wotton House Registered Park and Garden be included in the ES assessment. The Grade I listed Waddesdon Manor and Wotton House Registered Park and Garden have been included in the Stage 1 Setting Assessment. A detailed assessment is not considered necessary due to the limited visibility of the Proposed Development from these assets and the very low level of impact to their significance. - Consideration in the design towards Botolph Claydon Conservation Area. - Viewpoint selection.
26 March 2024	On-site meeting	<ul style="list-style-type: none"> - Settings impact for Claydon House and Knowl Hill. Key views of and from Knowl Hill and Claydon House have been considered in the assessment. - 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. - HE noted that the connection between Claydon House and surrounding farmhouses should be included in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] [APP-052]. - HE noted that the ridgeline in Parcel 2 has intervisibility with Waddesdon Manor.

- Design changes (removal of Fields D30 and D37 in the south of Parcel 2) has reduced visibility of the Proposed Development from Waddesdon Manor.
- 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.

2 October 2024 Teams Meeting
Online

- ~~- HE agreed that producing accurate visualisations from inside Claydon House would not be possible.~~
- HE agreed that a permissive footpath to Knowl Hill with appropriate interpretation panel would provide public benefit but allowing the significance of Claydon House to be better appreciated.
- It was agreed that the design change to push back solar around Botolph Claydon Conservation Area has reduced the impact but that the extent of harm should be confirmed in the assessment.
- HE requested photomontages from the south of the west terrace across the landscaped grounds and to and from Knowl Hill.
- A follow up meeting was arranged to share viewpoints from the virtual model. Viewpoints from west terrace and Knowl Hill produced.

23 October 2024 Teams Meeting
Online

- Discussion with National Trust and HE 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.
- Concern was expressed about allowing the hedgerows to grow up too quickly as this could result in a lack of density. It was suggested that Poplars may be appropriate. Additional viewpoints along Three Points Lane were requested.
- It was agreed that the views southwest from the terrace were most important as the top of Knowl Hill is prominent.
- It was confirmed that siting the Collector Compound within Field B10 would be preferable. Photomontages from west of the terrace have been produced (Viewpoint 5) to address concerns about

		<p>these views towards Knowl Hill as these were the most important. Other views from the 3D model with shared with but have not been developed into full visualisation.</p> <ul style="list-style-type: none"> - It was agreed that that hedgerows would be allowed to step up gradually and that tree varieties would mirror the current landscape uses.
18 December 2024	Teams Meeting Online	<ul style="list-style-type: none"> - Discussion on settings impact of designated assets in the study area and landscape mitigation, specifically the removal of Solar PV modules around Knowl Hill. - Consideration was given to additional hedgerow planting to screen panels southwest of Knowl Hill which may appear above the hill in views from upper floors of Claydon House, but it was agreed that this would itself result in an adverse effect on the landscape.
31 July 2025	Teams Meeting Online	<ul style="list-style-type: none"> - Discussion regarding assets scoped in/out of the assessment. - Discussion regarding viewpoints for inclusion in the assessment, HE requested that the viewpoints shared via the 3D Model on previous calls be rendered as verified visualisations (winter and summer) and that these include not just the solar panels, but all the associated infrastructure (fencing, lighting, substations and compounds).
19 August 2025	Teams Meeting Online	<ul style="list-style-type: none"> - HE expressed concerns regarding the proposed pond in Field B17 and requested further information regarding the size, depth, and form of this in order to provide comment. This was provided to HE following the meeting (22/8/2025).
3 September 2025	Email	<ul style="list-style-type: none"> - Review of document setting out the Potential Main Issues for Examination
28 November 2025	Teams Meeting Online	<ul style="list-style-type: none"> - Review of application documents and queries to inform HE Relevant Representation [RR-109].
16 December 2025	Teams	<ul style="list-style-type: none"> - Update provided to HE and National Trust on the design changes and review of the visualisations with the landscape and heritage leads

13 January 2026	Email Correspondence	Agreed locations for photo <u>montages</u> <u>graphy</u> from upper floors of Claydon House
25 <u>February</u> <u>2026</u>	Teams Meeting Online	- Review of the photo <u>montage</u> <u>graphs</u> taken from the agreed locations from the upper floors of Claydon House
<u>27 March</u> <u>2026</u>	<u>Teams Meeting</u> <u>Online</u>	- <u>Review of photomontages from upper floors of</u> <u>Claydon House. Agreement that level of harm to</u> <u>significance of Claydon House would be at the</u> <u>lower end of less than substantial.</u>

4. Current Position

4.1. Position of the Applicant and Historic England

~~4.1.1. — The following tables set out the position of the Applicant and HE, 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.~~

~~4.1.3.4.1.1. — 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 Historic England

Ref	Description of Matter	Historic England's Comment	Applicant's Response	Status
Assessment Methodology				
1.1	Heritage receptors to be included in the ES assessment	Historic England raised a comment on the potential for impacts to Waddesdon Manor and Wotton House Registered Park and Garden and recommended for this to be included in the ES assessment.	Waddesdon Manor and Wotton House Registered Park and Garden have been included in ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4] [APP-106] . A detailed assessment incorporated in ES Volume 2, Chapter 9: Cultural Heritage EN010158/APP/6.2.2] [APP-052] is not considered necessary due to the limited visibility of the Proposed Development from these assets and the very low level of impact to their significance.	Agreed
1.2	Heritage receptors to be included in the ES assessment	Historic England raised a comment on the potential for impacts on the scheduled monument Preceptory of Knights Hospitallers and Fulbrook Farm Deserted Medieval Settlement (Preceptory) and recommended for this to be included in the ES assessment.	A detailed setting assessment set out in ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4] [APP-106] has concluded that there will be a minor impact to the significance of the Preceptory as a result of changes to its setting. The Proposed Development would result in a residual effect of slight adverse significance which is not significant (as reported within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] [APP-052]).	Agreed
1.3	Photomontages	Photomontages should show any associated infrastructure such as lighting, compounds, CCTV towers and fencing should also be rendered in, which may exacerbate or have their own impacts that need to be taken into consideration.	The photomontages produced for the application which are provided in ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4.3] [APP-115] [APP-116] [APP-117] [APP-118] show all infrastructure including lighting, compounds, CCTV towers and fencing.	Agreed
1.4	Methodology and scope of the assessment	Historic England agree with the scope, methodology and conclusions of the cultural heritage assessment.	The Applicant welcomes this agreement.	Agreed
1.5	Viewpoints and Visualisations	HE requested that further visualisations are provided to demonstrate the impact from the upper floors of Claydon House agree with the selected locations for photomontages from the upper floors of Claydon House which have been submitted at Deadline 2 and agree with the conclusions that the harm to the significance of Claydon House will be at the lower end of less than significance. HE are satisfied that the pond proposed in Field B17 will not be discernible from Claydon House.	The Applicant notes the broad agreement regarding the assessment of impacts and considers that the use of the 3D model and reference to the existing photomontages within the ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052] 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 has submitted visualisations from the upper floors of Claydon House at Deadline 2. These demonstrate that the church and existing vegetation will screen views of the Proposed Development from the “custodians flat” on the south side of the house and that visibility of the Solar PV and Satellite Collector Compound from the west facing rooms will be softened by the proposed mitigation planting. The pond in Field B17 will not be discernible from Claydon House. The Applicant welcomes this agreement.-	Agreed Under Discussion
Designated Heritage Assets				
2.1	Designated heritage assets	HE concurs with the outcome of the assessment and mitigation proposals on Designated Heritage Assets	The Applicant is pleased to have reached agreement with Historic England regarding the effects on designated heritage assets.	Agreed

including the impact on Claydon House,
to be at the lower end of substantial.

2.2 Claydon Park,
Conservation Areas
and Grade II and
non-designated
heritage assets
Listed Buildings

Historic England leaves it defer to the
National Trust and Buckinghamshire
Council with regard to these designated
heritage these heritage assets.

The Applicant notes this and is progressing SOCGs with National Trust and Buckinghamshire Council.

Agreed

5. Signatures

This statement of Common Ground is agreed upon:

On behalf of Historic England

Name:

Signature:

Date:

On behalf of the Applicant

Name:

Signature:

Date:



rosefieldsolarfarm.co.uk