

Application by Rosefield Energyfarm Limited for an order granting development consent for the Rosefield Solar Farm project

Issue Specific Hearing 1

Responses to the Applicant's Comments (at REP2-086) on Written Responses Submitted as REP1-136

The approach adopted by the applicant in the majority of their responses is simply to reiterate their position or to refer to documents where it is claimed the matter has been addressed. Were this to be the case, the questions would not have been raised and so, for the most part, I consider my position unchanged.

Ref.	Summary Position	Applicant's Response	Comment
1.3.14	Need for the BESS is not made.	The applicant argues that it is not the Government's intention that project approvals should be limited by the Clean Power 2030 capacity ranges or NESO's prioritisation (NPS EN-1 (2023), Paragraph 3.2.6).	NESO's allocation of Gate 1 status and the current and foreseeable oversubscription of BESS schemes for the relevant transmission area suggest that there is no strong case for the applicant's BESS element.
1.3.18	Connection reform: Likelihood of a Gate 2 offer for the BESS.	The applicant considers that land holdings made through the present application are sufficient to secure a Gate 2 offer.	It remains to be determined that the applicant has submitted evidence that secures its case. Further, it has not demonstrated that the BESS is an absolute requirement for the operation of the solar element. On the contrary, they have indicated that the solar element could operate independent of a BESS facility.
1.3.20	Need for solar.	The applicant acknowledges that this is the case but expresses an expectation that additional schemes will be needed.	The applicant's response does not alter my position.
1.3.26	TEC Register indicates overcapacity for solar.		
2.3.10	Bats: Comment that the Proposed Development would have a negative impact on bats. Specific references made to Bechstein's bat.	The applicant simply refers to their Biodiversity report, oCEMP, oLEMP and oDEMP, stating that mitigation measures proposed to address the impacts of the	The comments of Natural England, Buckinghamshire Council and CSAG all express serious concerns as to the impacts

		Proposed Development are robust and sufficient.	on bats in general and Bechstein bats in particular. The applicant has not given sufficient weight to ensuring the eco-systems on which the bats depend would not be negatively impacted.
2.3.23	Negative impacts on wildlife.	The applicant simply refers to Biodiversity, oCEMP, oLEMP and oDEMP, stating that mitigation measures proposed to address the impacts of the Proposed Development are robust and sufficient.	The minimalist approach to ecological surveys (limited to land Parces 1, 1a, 2 & 3) and the very limited surveys in Parcel 3 mean that the applicant has not established a robust baseline against which the impacts of their proposed development can be judged with any confidence.
2.3.39	Impact on trees, ancient woodland and, in particular, Runts Wood.	The applicant states that all woodland habitat is retained and includes a minimum 30m offset from all ancient woodland with an additional 5m from Solar PV development to the security fence which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites.	The particular value of Runts Wood is its role as a habitat for rare species (e.g. hairstreak butterflies at its margins), and its value as part of the PRoW network with its wealth of flora (including bluebells) and fauna. Seen against the backdrop of solar panels adjacent to Splash Lane (Fields D3 south, D12, D13 D14, D15, D16) as well as, D26, D28 & D29, the latter on north facing slopes, would detract substantially from its landscape and amenity value.
7.3.6	PRoW and permissive footpaths: Comment that there would be negative visual effects from footpaths which would affect their amenity and therefore their use.	The applicant seeks to minimise the magnitude of effect on PRoWs although acknowledges that Significant effects relating to visual amenity (moderate or moderate/major adverse) will remain for five PRoWs, including links to Runts Wood.	The applicant fails to acknowledge the high value placed on PRoWs by residents and visitors or that the impacts are relentless being seen from so many aspects.
7.3.19	Topography of the site renders the development more visible and is unsuitable for solar.	The applicant refers to the response at 7.1.1 suggesting that the proposed mitigation measures take into account the topography of the Site.	This misses/avoids the key points. The topography is unsuitable because it includes a number of north-facing slopes and because placing industrial developments in highly visible positions means that the landscape

9.3.18	Tenant farmers: Comment that a tenant farmer was forced to leave a farm, and it was not a surrender as claimed by the Applicant.	The applicant states that a tenant farmer surrendered their interest by agreement. No tenant farmer has been forced to leave.	has to be changed in an attempt to screen the visual impacts.
9.3.22	Loss of access Comment that existing footpaths would be lost and that the proposed PRow diversions would reduce access and enjoyment of the countryside and should not be allowed.	The applicant asserts that the Outline RoWAS [EN010158/APP/7.8.3], demonstrates there would be no permanent loss of PRow or access to the countryside as a result of the Proposed Development. The Proposed Development would increase access within the Site and enhance connectivity in the local area through the inclusion of three new operational (including maintenance) phase permissive footpaths.	There is no indication as to whether the tenant farmer in question was offered the option to remain on their landholding. This hinges on the applicant's definition of 'countryside'. The point at issue is that the development would so transform the landscape that, to any independent observer, it would no longer be considered countryside
10.3.7	Non-BMV land: Comment that non-BMV agricultural land is still productive and the land within the Order Limits produces high-quality yields.	The Applicant acknowledges that non-BMV land such as Grade 3b can still be productive. It is noted that the potential for sheep and/or cattle grazing within the Order Limits during the operational (including maintenance) phase would retain an element of agricultural use.	Whilst the applicant has acknowledged that Grade 3b land can still be productive (a point, incidentally, demonstrated through the careful and intelligent management of Parcel 2 by the former tenant farmer), the comment on grazing within the Order Limits retaining an element of agricultural land is not supported by any commitment to do so or, indeed, a clear understanding as to its viability or practical demands.
10.3.12	Principle of development: Comment opposing the use of agricultural land for ground-mounted solar farm, including that the Proposed Development would impact domestic food security.	The applicant argues that the total area of land within Buckinghamshire is 187,400, therefore the Proposed Development would occupy 0.66% of the total region.	The applicant's approach is that land is simply a commodity and can be used for any purpose. In sport, a 1% increase in performance is considered significant and of value. By the same token, a decrease of similar scale is significant and a loss. In any event, it is not just a question of output. The country is rapidly losing agricultural expertise because of the challenges face by the farming community. The applicant is encouraged to take a more

11.3.1	Damage to the local road network: Comments expressing concern that construction vehicles would damage the condition of the local road network.	The applicant refers to the Outline CTMP [EN010158/APP/7.5.3] which includes a Wear & Tear Agreement to protect the condition of public roads used for construction access.	holistic view of the impacts on farming in assessing the consequences of their proposals.
11.3.6	Comments opposing the Proposed Development due to the amount of traffic generated by the Proposed Development. Specific comments opposed a high volume of construction traffic travelling through Botolph Claydon and Quainton.	The applicant states that construction traffic will be controlled by the Outline CTMP [EN010158/APP/7.5.3]. The construction route has been selected to ensure that it does not pass through local villages, located to the north of the A41, including Botolph Claydon and Quainton.	<p>This misses the point. Local communities are all too familiar with the severe damage caused to the local road network by HS2 and EWR construction traffic. It is not just the surface that suffers. Road margins are destroyed and the substructure is not fit for use by heavy vehicles. Experience is that roads are often 'repaired' by patching and surface dressing but damage to the substructure and road margins remains permanent.</p> <p>This will have been apparent to all during the Accompanied Site Inspection.</p> <p>The applicant will have no control over non-HGV traffic.</p> <p>Experience from other infrastructure projects is that traffic volumes through villages increase (with drivers often failing to respect speed limits) and there are knock-on effects across the road network outside the construction traffic route. This would present particular challenges if any other electrical infrastructure project in the area were to undergo construction at the same time as that of the applicant.</p>

I confirm that AI was not employed in the drafting of this document.

Dr Chris Jordan

May 2026

Application by Rosefield Energyfarm Limited for an order granting development consent for the Rosefield Solar Farm project.

Responses to the Applicant's Comments (at REP2-086) on Written Responses Submitted as REP1-160

The approach adopted by the applicant in the majority of their responses is simply to reiterate their position or to refer to documents where it is claimed the matter has been addressed. Given there is no change on the applicant's position or a more detailed response to the issues raised, for the most part, I consider my position unchanged.

Ref.	Summary Position	Applicant's Response	Comment
Background, 1.1	Agricultural Land: Comment rebutting the Applicant's position that the Site is of low agricultural value (due to much of the Site being classified as Grade 3b) since the Site includes part of the former Drovers Way from Buckingham to Aylesbury that passes down from Sion Hill, through Parcel 3.	The applicant accepts that Grade 3b is defined as "Land capable of producing moderate yields of a narrow range of crops ... or high yields of grass which can be grazed or harvested over most of the year". References to historical droving routes and generalised descriptions of pasture quality do not provide evidence that the inherent soil limitations identified by the survey are absent within Parcel 3, nor do they conflict with the ALC conclusions. As set out within the Outline Landscape and Ecological Management Plan [EN010158/APP/7.6.2] [REP1-086], grazing will continue during the operation phase where practicable.	The comment on former drovers' routes was clearly given as an example of the values of the land as rich pasture, not as a statement on the ALC assessment. The applicant misses the point that the soils present within the Order Limits have considerable value and the quality of crops achieved with intelligent farming is high, as was evident during the Accompanied Site Inspection. The land has particular for grazing, hence the evolution of businesses based on that attribute. The applicant's references to grazing of the land during operation of the development are always qualified by caveats and there is no clarity as to the viability of that arrangement or how it would be managed.
Background, 1.3 and Consequences of Granting CPO Rights, 5.5 and 5.6	Agricultural Tenants: Comment noting that a tenant farmer has been evicted in anticipation of the Proposed Development and that their	The Applicant can confirm that no tenant farmers have been evicted in anticipation of the Proposed Development.	There is no indication as to whether the tenant farmer was offered the option of retaining their landholding.

	<p>knowledge and skill has been lost. Further comment that the lost. integration of the farmer's fam</p>		
<p>Background, 1.4</p>	<p>Agricultural Character: Comment noting that agriculture has shaped the landscape with small fields and extensive hedgerows present. Further comment noting that these are features of the Local Landscape Character Areas and that many fields retain ridge and furrow profiles.</p>	<p>The applicant refers to documents where they consider that the issue has been addressed. They further state that ridge and furrow earthworks can be preserved beneath Solar PV modules with only minimal disturbance from piled supports.</p>	<p>I maintain my position on this point. As to ridge and furrow fields, some of the best-preserved ridge and furrow profiles in the area (Fields SA15-17) will be impacted by the scheme's internal tracks. In addition, this would impact on the setting of Grade II Listed Muxwell Farmhouse.</p>
<p>Applicant Assessment, 2.1</p>	<p>Agricultural Businesses: Comment noting that Appendix 14.1 of the ES makes no reference to agricultural businesses within the area and that the Applicant has not had regard to the importance of agriculture. Further comment noting that Prestons Farms is not included in Appendix 14.1 of the ES and that its sister company, provides a unique and irreplaceable pillar to the NHS.</p>	<p>The applicant suggests that the listing referred only to non-agricultural businesses and that TCS Biosciences was omitted for reasons of confidentiality. Nonetheless, they suggest that the applicant has recognised unique, important and sensitive nature of Preston Farms/TCS Biosciences operations in the attention provided through bilateral engagement, and iterative design and mitigation development through the pre-application (and post-submission) phase.</p>	<p>It is for Preston Farms/TCS Biosciences to make their own judgement on these points. However, comments made by the applicant at ISH1 and their documentation suggest that they have not fully understood the complexities of agricultural businesses in general and that of Preston Farms in particular. As a result, they have not undertaken an adequate, comprehensive appraisal of the potential consequences of their proposed development.</p>
<p>Applicant Assessment, 2.3 and Consequences of Granting CPO Rights, 5.1 and 5.2.</p>	<p>Agricultural Businesses Comment noting that the Applicant appears to view landholdings as commodities with little, if any attention, being paid to: the working of land, nature of soil, biosecurity, local farming community and animal husbandry.</p>	<p>The applicant states that they have acted upon feedback from agricultural landowners and tenants, considered impacts on soil and have put in place appropriate mitigation measures.</p>	<p>I refer to comments above and maintain my position on this point.</p>

Applicant Assessment,
2.5

Agricultural Businesses:

Comment noting that the impacts of both permanent and temporary removal of land from agricultural use should be The Environmental Statement does not rely on county level statistics in isolation, and these figures do not replace the assessment of local effects. Application Document Ref: EN010158/APP/8.14 Planning Inspectorate Scheme Ref: EN010158 Rosefield Solar Farm Applicant's Response to other Deadline 1 Submissions 9 viewed at the local, not county level, as the quoted loss of 0.65% of the county-wide agricultural land is disingenuous.

ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] assesses the effects of the Proposed Development on the agricultural economy at both the Buckingham county scale and at a local agricultural business and individual landholdings scale, informed by engagement with affected landowners and tenants, and national statistics.

Overall, it is anticipated that agricultural tenants are unlikely to be significantly affected by the Proposed Development in terms of their ability to produce economic output.

Buckinghamshire is a large county extending over a wide range of terrain and levels of development. The principal impact of the proposed development would be felt locally, not county-wide.

In **REP2-033** (Table 14.25) agricultural businesses are rated as **Very High** sensitivity and yet, for all phases of the proposed development, the applicant arrives at the conclusion that the magnitude of change would be **Minor** and the residual effect **Slight Adverse, Not Significant**. This is a **Highly Improbable** outcome.

Impacts on
Employment, 2.9

Employment Benefits:

Comment the importance of local agricultural businesses has been largely dismissed, and that any employment benefits would be during the construction phase and that such jobs would not benefit local people and that the operational phase jobs are limited.

The Applicant does not agree that the importance of local agricultural businesses has been largely dismissed.

The employment supported would include electrical engineering roles likely to require higher level skills and qualifications, as well as site management, administrative and process/elementary occupations including security and maintenance.

I maintain my position on the first point.

The implication in the applicant's comments on skills levels suggests that they judge agricultural workers to be low skilled. That is an unfortunate, gross misrepresentation.

Impacts on
Employment, 2.10 and
Applicant's
Conclusions, 3.3

Employment Benefits:

Comment noting that the Population Chapter of the ES estimates impact on employment in agriculture at a

The applicant refers to their assessment in ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2].

I maintain my position on this point.

	<p>county-wide basis and that this misrepresents the true impact on the local level and on businesses of national importance.</p>		
<p>Applicant's Conclusions, 3.2</p>	<p>Agricultural Businesses: Comment noting that no assessment of impact to the business of Preston Farms/TCS Biosciences has been had to the wider (national) economic and health impacts lens.</p>	<p>The Applicant has sought and had regard to feedback from businesses (including TCS Biosciences Ltd) during the pre-application period, and has amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential for noise and accessibility effects perceived by these businesses.</p>	<p>The applicant's documentation and discussions at ISH1 suggest that the applicant still has not grasped the importance of these businesses or of the potential for its proposed development to do harm.</p>
<p>Cumulative impacts. 4.2 & 4.3</p>	<p>Cumulative Assessments</p>	<p>The applicant has commented on specific aspects by reference to other documents.</p>	<p>The cumulative impacts of the proposed development are multifactorial and require extensive examination.</p>
<p>Consequences of Granting CPO Rights, 5.4</p>	<p>Compulsory Acquisition: Comment noting that the granting of compulsory purchase rights to a Third Party (assumed to be reference to the Applicant) raises questions about the future safeguarding of the land, the restriction on the land's usage and the prospects of the land returning to agricultural usage after decommissioning.</p>	<p>The applicant refers to other documents and suggests that there are appropriate safeguards to facilitate a return to agricultural use post-decommissioning.</p>	<p>The applicant's approach to agriculture, as demonstrated in its submissions, does not give confidence that this would be the case, especially if it were to be granted CPO rights.</p>
<p>Consequences of Granting CPO Rights, 5.7</p>	<p>Compulsory Acquisition: Comment querying the Applicant's ability to suitably act as a custodian of the land across all phases of the Proposed Development with regard for economic and heritage impacts.</p>	<p>EDF power solutions (formerly EDF Renewables Ltd), which is the majority shareholder of Rosefield EnergyFarm Limited, has significant experience with rural land management as it currently owns and operates 50 operational renewables sites in the UK (including solar, wind and BESS). EDF has a dedicated Asset Operations team which</p>	<p>Land management is not the same as agriculture. In any event, what are the guarantees that EDF Renewables would be the owners of the land throughout the lifetime of the project?</p>

includes environmental specialists with a
wealth of experience in land management.

I confirm that AI was not employed in the drafting of this document.

Dr Chris Jordan

May 2026