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Rosefield Solar Farm (EN010158)

**Buckinghamshire Council's Comments on the Applicant's
Updated Deadline 4 Documents and Comments on
Schedule of Changes to Draft DCO**

Buckinghamshire Council

July 2026

Buckinghamshire Council Comments on Applicant's Updated Documents at Deadline 4

Ref	Document submitted by	Application Document	Buckinghamshire Council Comments
<u>REP4-007</u>	Rosefield Energyfarm Limited	3.1.7 Draft Development Consent Order (Tracked) (Revision 07)	The Council welcome that a number of changes have been made to reflect some changes it raised (identified in the Schedule of Changes) [REP4-078] .
<u>REP4-018</u>	Rosefield Energyfarm Limited	5.16.3 Statement of Common Ground with Historic England (Tracked)	In the summary of engagement (Table 1), the discussions between the Applicant and Historic England relate chiefly to views of and from Claydon House, rather than wider elements of setting that relate to relationships with other heritage assets outside Historic England's purview (Historic England do not cover grade II listed buildings).
<u>REP4-030</u>	Rosefield Energyfarm Limited	6.2.3 Environmental Statement Volume 2 Chapter 9 - Cultural Heritage (Tracked) (Revision 3)	Only St Mary's Church, (previously omitted) has been added by the Applicant. There is no change to impacts and effects despite additional elements that contribute to significance that would be affected being added to the baseline in [REP4-060] . The Council would expect that with additional elements affected, there might be some change to effects.

REP4-034	Rosefield Energyfarm Limited	6.2.3 Environmental Statement Volume 2 Chapter 12 - Soil (Tracked) (Revision 3)	Disagreement remains on the assessment of ALC Grade 2 land, as discussed with Applicant. The Council agreed with the applicant that the Deadline 5 submission will include a clarifying sentence on the use of land excluded from Table 12.4.
REP4-040	Rosefield Energyfarm Limited	6.2.4 Environmental Statement Volume 2 Chapter 14 - Population (Tracked) (Revision 4)	Changes focus on the removal of Field E23 only. The Council's issues have not been addressed in this iteration. The Council awaits receipt of a technical appendix that sets out the assessment for individual receptors within clusters, connects to mitigation and sets out the professional judgement applied in all cases.
REP4-042	Rosefield Energyfarm Limited	6.2.5 Environmental Statement Volume 2 Chapter 7 - Biodiversity (Tracked) (Revision 5)	The Council will provide further comment at Deadline 6, following review of the Applicant's Deadline 5 submission.
REP4-047	Rosefield Energyfarm Limited	6.4.2 Environmental Statement Volume 4 Appendix 15.1 - Transport Assessment (Tracked) (Revision 2)	The changes are accepted, and the modelling addition included has demonstrated that the A41/Station Road junction has sufficient capacity to accommodate the construction traffic.
REP4-061	Rosefield Energyfarm Limited	6.4.3 Environmental Statement Volume 4 Appendix 9.1 - Archaeological Desk-Based Assessment and Setting Assessment (Tracked) (Revision 3)	In relation to the content of [REP4-060] the Council has the following comments in relation to the individual heritage assets where there is change to the Applicant's assessment:

			Claydon House (Grade I) and Park: no comment Botolph House (grade II*), section 2.3: The Council point out that the topography around Sion Hill Farm (a low promontory) may obscure much of the National Grid Substation from views out to the east (for a nearby view see LVIA View Point 13) and the National Grid Substation (beyond the north boundary of fields EN10 and EN11) and any visible parts of it would be at the left edge of views out of the first floor through the gap north of the pond on Botyl Road and the right edge of views towards the building from the east. The Council assess that the that the Proposed Development would place a strip of development (including the Main Collector Compound, Rosefield Substation and PV arrays in EN20, EN21, EN22 and EN23 across surviving views. This view plays an important contributory role in the setting and significance of Botolph House. Church of St Mary (grade II*), Section 2.4: The Applicant agrees that the BESS and Parcel 3 proposals (including the Main Collector Compound and Rosefield Substation) would be visible in views towards St Mary's Church from the east and that Viewpoints 27 and 28 illustrate that the church would remain prominent on the elevated ground above the
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			Order Limits in these views, but would be obscured from view by the Proposed Development when approaching along footpaths through the Order Limits. The Applicant's assessment does not mention that these wide views also include views from the south and south east, so the elements in Parcel 2 as well as Parcel 3 will impact on the setting of the Church in a wide sweep of views. The Applicant has changed the impact from negligible to minor with the same slight effect, which aligns with their Chapter 9 assessment [REP4-030]. The Council assesses that the band of development in the foreground of these views would harm their contribution to the significance of the church, altering the character of its agricultural setting to one where the church and landscape vie with the contrasting infrastructure in the foreground. Blackmoorhill Farmhouse (grade II), Section 2.14: We welcome the mention of dressed stone on the facade facing Claydon House. The Council agrees with the Applicant on harm but not effect. The Applicant does not discuss the of the approaches and states that there would be no impact on the farmhouse's relationship with Rosehill Farmhouse, but does conclude that PV arrays in Parcel 1 would be visible in "wider
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			surroundings". The Council consider that these wider surroundings include movement between Blackmoorhill and Rosehill Farmhouses and longer views of both farms along Addison Road where PV arrays would be visible to one side. Rosehill Farmhouse (two grade II listings), Section 2.28: The Council welcome the mention of dressed stone on the facade facing Claydon House. The Applicant mentions the former Shepherd Furze Farm stating that its demolition (by HS2) means that setting contributes less to the farm's significance. The Council feels that what survives of Rosehill Farm's historic setting makes an important contribution to its significance and that further erosion would harm significance even more. Shepherd Furze Farmhouse also had a dressed stone wall facing Claydon House. It was further away than Rosehill Farm to the latter's west. These relationships were therefore meant to be appreciated/experienced despite the Farm's long distance from Claydon House and the probability that there was little visibility between Shepherd Furze Farm and Claydon House. The legibility of these relationships would be harmed by the positioning of modern infrastructure along the access routes.
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			Pond Farmhouse (grade II), Section 2.26: The Applicant identifies an early 19th century date. The Council identifies a late 17th to early 18th century date. The listing description (National Heritage List for England) agrees with the Council. This was mentioned and the date taken on board by the Applicant in a meeting. The older date means that the house would be more significant than if it was 19th century, given its stone architecture, although it remains of Medium importance in EIA terms. The Applicant states that association with the other estate farms is not readily apparent, as there is no intervisibility, but use of stone, its location on approaches to Claydon House and the fact that its land is adjacent to the former parkland outside the Registered Park, suggests that it is readily legible as part of the group of estate farms. East Claydon Village (being assessed for Conservation Area status) Section 2.42: The Applicant states that their conclusion is based on the assessment that the Proposed Development would not interrupt views of the village from the south and east, but would be visible (illustrated by Viewpoints 27 and 28) and that there would not be views of the village from the footpaths that pass Order
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			Limits. The Council identify that views of East Claydon from the east, south east and south are extensive and Viewpoints 30, views further north along the same path on the edge of the hill (100-200m north of Hogshaw Hill Farmhouse) and Viewpoint 32 also illustrate these views. The band of development in the foreground of these views and in the views back from the edges of the village would harm the agricultural character of the village's setting and of the historic character of the landscape. The village would have to compete with the contrasting infrastructure development in views. All Saints Church (grade II), Section 2.40: The Council confirms its position in relation to views from Knowl Hill, that the PV arrays occupying one side of the views would harm the setting of Claydon House. The Fernery and Arch and wall (two grade II listed buildings), Section 2.38: No comment, other than that we differ on the nature of their significance and setting but agree that harm would be at the lower end of less than substantial harm.
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REP4-063	Rosefield Energyfarm Limited	6.4.6 Environmental Statement Volume 4 Appendix 5.5 - Health and Wellbeing Summary Statement (Tracked) (Revision 6)	The Council notes that the Applicant seeks to connect the updates to addressing comments raised by the Council. However, the edits fail to address the concerns, as expressed at ISH3. The Council has subsequently prepared a Technical Note to the Applicant, at the request of the ExA, to illustrate the level of analysis that the Council is seeking, benchmarked to precedent from other transferable DCO processes and tailored to the content of the Applicant's submission to date. The Council awaits this further iteration, alongside a technical appendix, to comment further in due course.
REP4-065	Rosefield Energyfarm Limited	7.2.5 Outline Construction Environmental Management Plan (Tracked) (Revision 5)	Specifically on arboriculture, the Council welcomes the additional arboricultural wording in the updated oCEMP. The Council's remaining comments on arboriculture are limited to clarification of implementation and sequencing. The Outline CEMP should confirm, for clarity, that the excavation controls apply, where relevant, to all works within or close to RPAs, including fencing, drainage and cabling. The Council also requests confirmation that the AMS, or relevant arboricultural controls, will be in

			place before any permitted preliminary works capable of affecting retained trees, hedgerows, RPAs or woodland buffers. Where perimeter/site-security fencing is relied upon as tree protection or as an exclusion barrier, its timing, specification and relationship with any separate tree protection fencing should be clearly secured. Subject to these clarifications, the updated Outline CEMP wording assists in narrowing the arboricultural matters.
REP4-067	Rosefield Energyfarm Limited	7.3.5 Outline Operational Environmental Management Plan (Tracked) (Revision 5)	The Council welcome the addition related to consulting with other developments to manage cumulative noise effects as an approach to bring some mitigation to the concerns that the Council has.
REP4-069	Rosefield Energyfarm Limited	7.4.5 Outline Decommissioning Environmental Management Plan (Tracked) (Revision 5)	The Council welcome the amendment of the document to include that an updated Dust Risk Assessment will be undertaken prior to the start of the decommissioning phase.
REP4-071	Rosefield Energyfarm Limited	7.5.4 Outline Construction Traffic Management Plan (Tracked) (Revision 3)	The addition of the mode share targets as requested is welcome.

REP4-073	Rosefield Energyfarm Limited	7.6.5 Outline Landscape and Ecological Management Plan (Tracked) (Revision 5)	The Council welcome the amendment of the document, particularly the clarification of early planting and the extension of annual hedgerow monitoring beyond Year 5. However, further clarification and strengthening are required. Early planting should be linked to commencement of construction within the relevant phase or location, with any exception clearly identified and justified within the detailed LEMP(s). There are currently no relevant TPO trees within the area. The new replacement provision would therefore principally relate to any future TPOs affected under Article 41 of the DCO. As Article 41 disapplies the statutory replacement duty under section 206(1), the oLEMP should secure a clear and independently enforceable requirement to replace any protected tree removed, or subsequently lost following lopping or root cutting, during any phase of the Proposed Development. The process for agreeing on replacement species, size, location, planting
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			timescale, establishment and subsequent maintenance should also be specified. Hedgerow management should distinguish routine hedge cutting from the management of mature trees contained within hedgerows. Veteran and identified future veteran trees should be mapped, excluded from routine hedgerow cutting and subject to tree-specific management prescriptions prepared by a suitably qualified arboriculturist. Deadwood should be retained unless removal is clearly justified by an identified safety or operational requirement. Paragraph 4.3.25 should also be clarified so that the reference to 15m does not replace the wider feature-specific buffers secured for woodland, ancient woodland other retained features. Tree protection fencing and construction controls should reflect the full applicable buffer or RPA, whichever provides the greater protection. The five-year review of the detailed LEMP(s) is currently assigned to an ecologist and landscape architect. A suitably qualified
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			arboriculturist should also be involved where the review relates to retained or proposed trees, veteran and future veteran trees, woodland or hedgerow trees.
REP4-076	Rosefield Energyfarm Limited	Environmental Statement Volume 4 Appendix 7.17 BNG Assessment Statutory Metric (EXCEL)	The Council will provide further comment at Deadline 6, following review of the Applicant's Deadline 5 submission.
REP4-086	Rosefield Energyfarm Limited	8.28 Preliminary Biosecurity Statement (Revision 01)	Ultimately, the acceptability of this is a matter for the Applicant, Preston Farms, and TCS Biosciences. The submissions at ISH 3 are noted. The Council expects to see reference to this document and how the measures convey controls on impact magnitude, within the technical appendix to the Population chapter and human health reporting, as agreed by the Applicant at ISH3.
REP4-087	Rosefield Energyfarm Limited	8.29 Construction Access Review (Revision 01)	The Highways Authority assessed the route which was provided to it. As noted, the Highways Authority has not assessed specific impacts on Preston Farms and TCS Biosciences. In such circumstances, and in the absence of an assessment of effects on those businesses but also a detailed route proposal,

			the Council cannot comment further at this stage.
CR1-030	Rosefield EnergyFarm Limited	Rosefield Solar Farm Change Application (June 2026)	The Council have no comments on the change application.

Comments on Schedule of Changes to Draft DCO

The Council generally supports the changes suggested by the ExA to the draft DCO. The Council has only provided specific comment below where it has something to add or change related to the change.

Article 12(4)(c): this change is supported. However, the Council note that there is a danger that this may be interpreted as a further alternative to 12(4)(a) and 12(4)(b). As such, it is suggested that this be entered as a continuation of the main text in (4) after (a) and (b) and begin with the words “and in both cases may only do so where there is no reasonable alternative...”

Article 16: the Council is content with the wording that the Applicant added to the oCTMP, albeit it is recognised that the amended DCO text suggested by the ExA does provide further security if the ExA consider that appropriate.

As noted above, the changes suggested are welcome to the Council. The Council will comment on the Applicant’s comments at the next deadline if required.