

Rosefield Solar Farm

Statement of Commonality

(CleanTracked)

EN010158/APP/5.13.65
Revision 065
Deadline 65
August July 2026
Rosefield Energyfarm Ltd

APFP Regulation 5(2)(q)
Planning Act 2008
Infrastructure Planning
(Applications: Prescribed Forms
and Procedure) Regulations 2009

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1. Introduction

1.1. Overview

- 1.1.1. This Statement of Commonality has been prepared on behalf of Rosefield Energyfarm Limited ('the Applicant') in relation to the Development Consent Order (DCO) Application for the construction, operation (including maintenance), and decommissioning of Rosefield Solar Farm (hereafter referred to as the 'Proposed Development').
- 1.1.2. This document has been updated at Deadline [5-6](#) and provides the Examining Authority ('ExA') with [an up-to-date](#) ~~the final~~ position on the Statements of Common Ground ('SoCG') between the Applicant and relevant consultees and Interested Parties in relation to the Proposed Development. ~~This Statement of Commonality will be updated throughout the course of the Examination.~~
- 1.1.3. The Proposed Development is classed as a Nationally Significant Infrastructure Project ('NSIP') as defined under Section 15 of the Planning Act 2008 (the 'PA 2008'), as the capacity exceeds 50MW and, as such, must be consented by a DCO. The PA 2008 sets out that the Secretary of State is responsible for determining whether to grant a DCO for the Proposed Development and, under the PA 2008, has the power to appoint an ExA of an appointed person(s) to manage and examine the DCO Application on behalf of the Secretary of State.

1.2. Description of Development

- 1.2.1. The Proposed Development comprises the construction, operation (including maintenance) and decommissioning of Solar Photovoltaic ('PV') development and energy storage, together with associated infrastructure and Grid Connection Cabling Corridor to the National Grid East Claydon Substation.
- 1.2.2. A description of the Proposed Development can be found in Section 3.1 of **Environmental Statement (ES) Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2]**. The terminology used in this Statement of Commonality is defined in **ES Volume 1, Chapter 0: Glossary [EN010158/APP/6.1] [APP-043]**.
- 1.2.3. The main objective of the Proposed Development is to generate low-carbon renewable energy that can contribute to addressing the urgent need to decarbonise the UK's energy supply. This is explained within Section 3 of the **Statement of Need [EN010158/APP/5.6] [APP-036]**.

1.3. Structure of this Statement of Commonality

1.3.1. This Statement of Commonality is structured as follows:

- **Section 2** details the structure of each SoCG and also provides a list of the SoCGs that have been produced to date;
- **Section 3** addresses the current status of each SoCG; ~~and~~
- **Section 4** sets out the commonality between topics covered in SoCGs with a summary of their position; ~~and~~
- **Section 5** provides a list of the matters not agreed at Deadline 6.-

2. Position

2.1. Structure of the SoCGs

2.1.1. Each SoCG adopts a standard format to ensure consistency in the approach taken to documenting the matters agreed, matters subject to ongoing discussion, or matters that are not agreed upon.

2.1.2. Each of the SoCGs are structured in the following way:

- Section 1 provides an introduction to the SoCG, including a description of the document and the relevant SoCG party;
- Section 2 provides a summary of engagement between the Applicant and the relevant party so far; and
- Section 3 provides a schedule of matters raised by the relevant party and the Applicant's responses to these.

2.2. List of SoCGs

2.2.1. Following continuous and ongoing engagement with relevant statutory and non-statutory consultees, the Applicant jointly prepared and submitted two SoCGs as part of the DCO Application at submission. These SoCGs were with Buckinghamshire and Milton Keynes Fire Authority and the UK Health Security Agency.

2.2.2. In terms of those submitted ~~at this stage~~ by Deadline 6, this includes:

- SoCG with Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11.3] [REP4-012]
- ~~Draft~~ SoCG with UKHSA [EN010158/APP/5.12.23]
- ~~Draft~~ SoCG with Natural England [EN010158/APP/5.14.32]
- ~~Draft~~ SoCG with Environment Agency [EN010158/APP/5.15.6-5]
- SoCG with Historic England [EN010158/APP/5.16.3] [REP4-017]
- SoCG with National Trust [EN010158/APP/5.17.2] [REP2-020]
- ~~Draft~~ SoCG with Anglian Water Services Limited [EN010158/APP/5.18.2]
- SoCG with High Speed 2 Limited [EN010158/APP/5.19.2] [REP5-020]
- ~~Draft~~ SoCG with National Grid Electricity Transmission Plc [EN010158/APP/5.20.2]

- SoCG with National Highways [EN010158/APP/5.21.2] [\[REP2-022\]](#)
- ~~Draft~~ SoCG with Buckinghamshire Council [EN010158/APP/5.22.56]
- ~~Draft~~ SoCG with Claydons Solar Action Group [EN010158/APP/5.23.34]
- [SoCG with Preston Farms and TCS Biosciences Ltd](#)
[\[EN010158/APP/5.24\]](#)

~~2.2.3. In their Written Representation [REP1-133] Preston Farms Ltd and TCS Biosciences Ltd requested that the Applicant enter into an SoCG with them in order to narrow the issues and identify matters in dispute. The Applicant has confirmed, in the Applicant's Response to Written Representations [EN010158/APP/8.12] that a draft SoCG has been shared with Preston Farms and TCS Biosciences Ltd. This draft was shared on 15 May 2025. The Applicant continues to engage with Preston Farms Ltd and TCS Biosciences Ltd regarding this draft SoCG and will submit this before the close of Examination as requested by Action Point 31 of Issue Specific Hearing 3.~~

3. Status of SoCGs

3.1. Summary of Current Position

- 3.1.1. This Section confirms the ~~current~~final status of each SoCG at Deadline ~~56~~.
- 3.1.2. **Table 3.1** provides a high-level position on the status of each SoCG and, where necessary, includes further detail to aid the understanding of an SoCG's status.
- 3.1.3. The terms used in **Table 3.1** can be described as follows:
- 'Final SoCG' - the final SoCG has been agreed upon by both parties, with no outstanding matters to resolve;
 - 'Draft SoCG' - the SoCG continues to be discussed between both parties with some level of agreement and some issues still outstanding, meaning the SoCG is yet to be signed off on;
 - 'Initial draft SoCG' - the initial SoCG has been drafted by the Applicant (using any matters identified from meetings with the party alongside responses to Statutory Consultation and Relevant and/or Written Representations) and is with the consultee for review. An initial draft SoCG has not yet had feedback from the consultee and is not signed off; and
 - 'Not yet submitted' – the Applicant is progressing or soon to be progressing these SoCGs with a party with the intent to submit a draft at a subsequent deadline.

Table 3.1 – Current Status of SoCGs

Document Ref.	Relevant Party	Position at Deadline 56
[EN010158/APP/5.11.3]	Buckinghamshire and Milton Keynes Fire Authority	Final SoCG
[EN010158/APP/5.12. 23]	UK Health Security Agency	Draft <u>Final</u> SoCG
[EN010158/APP/5.14. 23]	Natural England	<u>Final</u> Draft SoCG
[EN010158/APP/5.15. 56]	Environment Agency	<u>Final</u> Draft SoCG
[EN010158/APP/5.16.3]	Historic England	Final SoCG

[EN010158/APP/5.17.2]	National Trust	Final SoCG
[EN010158/APP/5.18.2]	Anglian Water Services Limited	Final <u>Draft</u> SoCG
[EN010158/APP/5.19.2]	High Speed 2 Limited	Final SoCG
[EN010158/APP/5.20.2]	National Grid Electricity Transmission Plc	Final <u>Draft</u> SoCG
[EN010158/APP/5.21.2]	National Highways	Final SoCG
[EN010158/APP/5.22.56]	Buckinghamshire Council	Final <u>Draft</u> SoCG
[EN010158/APP/5.23.34]	Claydons Solar Action Group	Final <u>Draft</u> SoCG
<u>[EN010158/APP/5.24]TBC</u>	TCS Biosciences / Preston Farm	Final SoCG <u>Not yet submitted</u>

4. Summary

4.1.1. This Section provides the overarching position across the main topics covered by the SoCGs at Deadline [4.6](#) with **Table 4.1** below identifying where commonality has been reached between the Applicant and SoCG parties.

4.1.2. ~~Table 4.1 also recognises where topics require further discussion, are not applicable or have concluded in disagreement.~~ Colour coding is used within **Table 4.1** to clarify the status of the commonality reached, as reflected in the below table.

Cell	Status
	Agreed
	Subject to further discussion
	Currently subject to disagreement
	Not applicable

Table 4.1 – Summary of Commonality with Parties

DOC REF.	PARTY	TOPICS																										
		Planning Policy	BESS/Fire Safety	Cumulative Impacts	Climate Change	Cultural Heritage / Historic Environment	Public Health / Wellbeing	Land Use / Agriculture	Air Quality	Construction	Glint and Glare	Noise and vibration	Landscape and Visual	PRoW and Permissive Footpaths	Traffic and Transport	Alternatives	Water, Flood Risk & Drainage	Waste Management	Decommissioning	Land Interest/ CA / PPs	Draft DCO	Impact on existing apparatus/infrastructure	Land contamination	Ecology and Biodiversity	Population/Economic Impacts	Grid Connection	Design	Approach to the EIA
[EN010158/APP/5.11.3]	Buckinghamshire and Milton Keynes Fire Authority																											
[EN010158/APP/5.12.23]	UK Health Security Agency																											
[EN010158/APP/5.14.23]	Natural England																											
[EN010158/APP/5.15.56]	Environment Agency																											
[EN010158/APP/5.16.3]	Historic England																											
[EN010158/APP/5.17.2]	National Trust																											
[EN010158/APP/5.18.2]	Anglian Water Services Limited																											
[EN010158/APP/5.19.2]	High Speed 2 Limited																											
[EN010158/APP/5.20.2]	National Grid Electricity Transmission Plc																											
[EN010158/APP/5.21.2]	National Highways																											

[EN010158/APP/5.22.56]	Buckinghamshire Council																											
[EN010158/APP/5.23.34]	Claydons Solar Action Group																											
[EN010158/APP/5.24]	Preston Farms and TCS Biosciences Ltd																											

5. Matters not agreed

5.1.1. This section provides a summary of the topics which were not agreed within the SoCGs submitted throughout the course of the Examination for the Proposed Development with each of the relevant stakeholders.

5.1.2. Table 5-1 sets out the topics not agreed with each of the relevant stakeholders.

Table 5-1: Summary of Matters not agreed

<u>Relevant Stakeholder</u>	<u>Summary of Matters Not Agreed</u>
<u>Buckinghamshire and Milton Keynes Fire Authority</u>	<u>All matters were agreed within the SoCG.</u>
<u>UK Health Security Agency</u>	<u>All matters were agreed within the SoCG.</u>
<u>Natural England</u>	<u>Protected species and habitats</u> - <u>specifically Protected Species – Buffer Zone Measurement (ref 1.7)</u> - <u>Great Crested Newt Licence (ref 1.9)</u>
<u>Environment Agency</u>	<u>Draft DCO</u> - <u>Wording of requirements (ref. 7.2)</u>
<u>Historic England</u>	<u>All matters were agreed within the SoCG.</u>
<u>National Trust</u>	<u>All matters were agreed within the SoCG.</u>
<u>Anglian Water Services Limited</u>	<u>All matters were agreed within the SoCG.</u>
<u>High Speed 2 Limited</u>	<u>All matters were agreed within the SoCG.</u>
<u>National Grid Electricity Transmission Plc</u>	<u>All matters were agreed within the SoCG.</u>

National Highways All matters were agreed within the SoCG.

Buckinghamshire Council

Biodiversity

- Assessment Methodology (ref. 2-2b)
- Embedded Mitigation (ref. 2-3)
- Offset to ancient woodland (ref. 2-4)
- Bats (ref. 2-6)
- Proposed Bat Monitoring (ref. 2-9)
- Hedgerow removal (ref. 2-13)
- Ground nesting bird mitigation (ref. 2-14)

Cultural Heritage

- Assessment methodology, including how the contribution of setting to significance has been identified (ref. 4-1b)
- Bernwood Farm (ref. 4-4a)
- Harm to significance of Claydon House and Park (ref. 4-6a)
- Harm to the significance of All Saint's Church, St Mary's Church and East Claydon village, Rosehill Farmhouse, Botolph House, Botolph Claydon Conservation Area (ref. 4-6c)
- Blackmoorhill Farmhouse (ref. 4-6d)
- Harm to the significance of Pond Farmhouse (ref. 4-6e)

Cumulative Effects

- 'Temporary' effects (ref. 5-2)
- Cumulative effects (ref. 5-3)

Landscape and Visual Impacts

- Visual effects (ref. 6-7)
- Assessment methodology and conclusions (ref. 6-8)
- BESS (ref.6-9)
- Mitigation (ref. 6-10)

Soils

- Soil classification (ref. 8-4)
- Assessment methodology (ref. 8-7)

Noise

- Assessment approach and methodology (ref. 9-2)

Population and Human Health

- [Approach to Health Impact Assessment \(ref. 10-1b\)](#)
- [Approach to the \(population\) assessment \(ref. 10-2b\)](#)
- [Residual Significant Health Impacts \(ref. 10-5b\)](#)

Claydons Solar Action Group

Site Selection and Consideration of alternatives

- [Adequacy of assessment \(ref. 1-1\)](#)
- [Mitigation hierarchy \(rRef. 1-2\)](#)
- [Topography \(ref. 1-3\)](#)
- [Statement of Need \(ref. 1-4\)](#)

Population

- [Scope of Assessment \(ref. 2-1\) \(Partial Agreement\)](#)
- [Impacts on local business \(ref. 2-2\)](#)
- [Local employment \(ref. 2-3\)](#)
- [Accessibility \(ref. 2-4\)](#)
- [Accessibility/Consideration of alternatives \(ref. 2-5\)](#)
- [Elderly and vulnerable residents \(ref. 2-6\)](#)
- [Road safety \(ref. 2-7\)](#)
- [Cumulative effects \(ref. 2-8\)](#)

Residential Visual Amenity Assessment

- [Mitigation \(ref. 3-1\)](#)
- [Assessment methodology \(ref. 3-2\)](#)
- [Screening distances \(ref. 3-3\)](#)
- [Evidence base \(ref. 3-4\)](#)
- [Conclusions \(ref. 3-5\)](#)
- [Threshold of Significance \(ref. 3-6\)](#)
- [Cumulative impacts \(ref. 3-7\)](#)
- [Other local businesses \(ref. 3-8\)](#)

Landscape and Visual

- [Landscape and Visual: Effects \(refs. 4-2; 4-3; 4-4\)](#)
- [Mitigation \(ref. 4-6\)](#)
- [Landscape and Visual: Method \(refs. 4-7; 4-8; 4-9; 4-10; 4-11\)](#)

Ecology

- [Hazel dormouse \(ref. 5-2\)](#)

- [Precautionary principle/mitigation hierarchy \(ref. 5-4\)](#)
- [Construction compounds \(ref. 5-5\)](#)
- [Bats \(refs. 5-6; 5-7\)](#)
- [Birds \(refs. 5-8; 5-9; 5-10\)](#)
- [Other taxa \(ref. 5-11\)](#)
- [BNG \(refs. 5-12; 5-13\)](#)
- [Grazing \(ref. 5-14\)](#)
- [Mitigation \(ref. 5-15\)](#)

Cultural Heritage

- [Levels of Harm \(ref. 6-3\)](#)
- [Claydon Park/Claydon House \(ref. 6-5\)](#)
- [Claydon House complex \(ref. 6-6\)](#)
- [Pond farmhouse \(ref. 6-7\)](#)

Transport

- [Methodology \(refs. 7-1; 7-2; 7-3\)](#)
- [Business impacts \(ref. 7-4\)](#)
- [Cumulative Impacts \(ref. 7-5\)](#)
- [Road widths \(ref. 7-6\)](#)
- [Flood risk \(ref. 7-7\)](#)
- [Other road users \(ref. 7-8\)](#)
- [CTMP \(ref. 7-9; 7-10; 7-11; 7-12\)](#)
- [CEMP \(ref. 7-13\)](#)

Public Rights of Way

- [Methodology \(refs. 8-2; 8-3\)](#)
- [Buckinghamshire Greenway \(ref. 8-4\)](#)
- [Assessment of Impacts \(ref. 8-5\)](#)
- [BESS impacts \(ref. 8-6\)](#)

Noise and Vibration

- [Piling vibration \(ref. 9-5\)](#)
- [Mitigation \(refs. 9-6; 9-7\)](#)
- [Magnitude of impact \(ref. 9-8\)](#)
- [Spectral noise levels \(ref. 9-9\)](#)
- [Building facades \(ref. 9-10\)](#)

- [Underestimation/omission of noise sources \(ref. 9-11\)](#)
- [Cumulative impacts with Statera BESS \(ref. 9-12\)](#)
- [Acoustic barriers \(ref. 9-13\)](#)
- [Evidence to demonstrate LOAEL can be met \(ref. 9-14\)](#)
- [Failure to demonstrate residual impacts will be low/negligible \(ref. 9-15\)](#)
- [Wildlife/livestock \(ref. 9-16\)](#)

Soils

- [Failure to demonstrate there were no available sites with poorer quality land \(ref. 10-2\)](#)
- [ALC \(ref. 10-3\)](#)
- [Impacts \(ref. 10-5\)](#)
- [Post-decommissioning condition \(ref. 10-6\)](#)
- [Decommissioning \(ref. 10-7\)](#)

Preston Farms and TCS Biosciences Ltd

General

- [Development Proposals \(refs. 1.3; 1.5\)](#)
- [PFL Operation \(refs. 1.6; 1.7; 1.8\)](#)
- [Livestock welfare \(refs. 1.10; 1.11; 1.12; 1.13; 1.14; 1.15; 1.16\)](#)
- [Fragmentation of the PFL Holding \(refs. 1.17; 1.18; 1.19; 1.20; 1.21; 1.22\)](#)
- [Avoiding fragmentation and unacceptable risk/likely significant effects \(see also below under \(4\), \(5\), \(6\)\) \(ref. 1.23\)](#)
- [Engagement \(ref. 1.24\)](#)

Priority of PFL/TCS

- [Exclusive Supply \(ref. 2.1\)](#)
- [Disruption in supply \(ref. 2.4\)](#)
- [Assessment of adverse effects \(ref. 2.5\)](#)
- [National Health \(ref. 2.6\)](#)
- [Harm to national health \(ref. 2.7\)](#)
- [Unacceptable residual impact \(refs. 2.8; 2.9; 2.10\)](#)

Biosecurity

- [PFL Protocols \(ref. 3.1\)](#)
- [Biosecurity \(ref. 3.2\)](#)
- [Biosecurity during Construction \(refs. 3.3; 3.4; 3.5\)](#)

- Biosecurity during Operation (refs. 3.6; 3.7)

Assessment of unacceptable risk/likely significant effects

- EIA (ref. 4.1) (points (ii) and (iii) Not Agreed)
- Assessing Risk (ref. 4.2)
- Mitigation (ref. 4.3)

Noise

- Noise: PFL Operations (ref. 5.1)
- Proposed development (refs. 5.2; 5.3; 5.4)
- Assessment of noise (refs. 5.5; 5.6)
- Likely significant effect/unacceptable risk (ref. 5.7)

BESS Fire Risk and Atmospheric Dispersion

- Fire Risk Severity (ref. 6.1)

Design

- Current use of Field E23 by PFL (refs. 7.1; 7.2; 7.3; 7.4; 7.5; 7.6; 7.7)
- Consequences of loss of E23 for PFL (refs. 7.8; 7.9; 7.10; 7.11)
- Consequences of removal of E23 for the Applicant (refs. 7.12; 7.13)
- Livestock corridors (ref. 7.14)
- Livestock 'arc' (refs. 7.15; 7.16)

Traffic and Access

- Access to Parcel 3 (ref. 8.1)
- Traffic and access (ref. 8.2)
- Alternative routes (ref. 8.3)
- Access routes (ref. 8.4)
- Alternative Access Route (ref. 8.5)

Replacement Land

- Current operation (ref. 9.2)
- Provision of replacement land (ref. 9.3)
- Compulsory acquisition of land (refs. 9.8; 9.9; 9.10; 9.11)



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