

Rosefield Solar Farm

~~Draft~~ Statement of Common Ground –
Anglian Water Services Ltd.
(Tracked)



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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. Rosefield Solar Farm (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 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 Anglian Water Services Ltd (AWS).
- 1.2.2. AWS is a statutory stakeholder defined as the relevant statutory water and sewerage undertaker for the majority of the Proposed Development. The area south of Botolph Claydon towards Quainton falls outside this and is serviced by another statutory undertaker (Thames Water Utilities Limited).
- 1.2.3. Collectively, the Applicant and AWS are referred to as 'the parties'.

1.3. Purpose of this Document

- 1.3.1. This Statement of Common Ground ('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 as the examination progresses in order to enable a final version to be submitted to the Examining Authority a final position between both parties.
- 1.3.2. The SoCG has been prepared in accordance with the Department for Levelling Up, Housing and Communities' Guidance on the examination stage for Nationally Significant Infrastructure Projects ('DLUHC Guidance').
- 1.3.3. Paragraph 007 of the DLUHC 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 AWS and the Applicant on matters relating to the 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 AWS.~~

~~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. This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents will be available in the deposit locations and/or the Planning Inspectorate website after submission of the DCO application.

~~1.3.8.~~ 1.3.7. Once finalised, the SoCG will be submitted to the Examining Authority concerning the Application under section 37 of the 2008 Act for an order granting development consent for the construction of 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

1.4. 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 comprises the installation, construction and decommissioning works, with the details to be defined at detailed design and subject to approval by the 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/2.3.2] [AS-006], the **Design Commitments** [EN010158/APP/5.9.2] [AS-018] and the requirements set out in the **Draft DCO** [EN010158/APP/3.1.2] [AS-010].
- 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 **Environmental Statement (ES) Volume 3, Figure 1.1: Location Plan** [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 permanently divert four PRow Footpaths in five instances;
 - 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.
- Record of Engagement

3. Record of Engagement

3.1.1. The parties have been engaged in consultation throughout the early stages of the project. Table 1 shows a summary of key engagement that has taken place between the Applicant and AWS in relation to the Application.

Table 1 - Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
16/11/2023	Teams Meeting Online – Introductory meeting	Recommendations for EDFR to use the inflow system for all DCO projects
14/11/2024	Teams meeting online - Statutory -pre consultation AWS response received.	- Welcome management plans to help reduce damage to AWS assets. Limitation of 20m3 per day of water supply for non-domestic purposes. - Recommends further discussion on a number of topics.
13/01/2025	Teams meeting online - Post Statutory Consultation meeting AWS	AWS and Rosefield project team agreed on the approaches as set out in the presentation on wastewater and potable water supply to site.
10/04/2025	AWS discussion online	Discussions for supply requirements and permits for discharge potentially required.
18/06/2025	Inflow application submitted through AWS 'Inflow' system	Information sent through about the development to request pre-planning enquiry for potential water supply.
16/07/2025	Report published in response to inflow application from AWS	Outlines easements, potential connection point, planting requirements, limitations or works, access requirements, survey requirements and process that applicant would adhere to.
18/08/2025	Teams meeting online. Pre-DCO submission discussion with AWS	- to discuss updates to development, - inflow report responses, - schedule - Supply volumes and foul water volumes discussed. - SOCG discussed and shared following the call. - Slides shared after discussion.
02/09/2025	Teams Meeting Online	- Discuss rates of discharge for water recycling centres. Following discussion email sent on 05/09/25 confirming discharge rates for construction phase and operational phase.

18/09/2025	Email from AWS	- A revised assessment from AWS Water Modelling team was requested. This was received on 18/09/2025 via email with AWS.
05/11/2025	Email from Applicant to AWS	Applicant shared the section 56 letter, regulation 8 notice and also copies of the application document.
02/03/2026	Teams Meeting Online	Catch up regarding the protective provisions for the Proposed Development.
22/04/2026	Teams Meeting Online	-Discuss SOCG and closing item 5 – additional words requirement for masterplans that will be committed to.
<u>15/07/2026</u>	<u>Email from AWS</u>	<u>Confirmation that the PP'S are now agreed and finalised.</u>

4. Current Position

Position of the Applicant and AWS

4.1.1. The following tables set out the position of the Applicant and AWS following a series of meetings and discussions with respect to the key areas of the Proposed Development. ~~This includes matters where discussions are ongoing.~~

4.1.2.4.1.1. ~~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~~

Table 2 – Topics Discussed

Ref	Description of Matter	AWS Position	Applicant's Response	Status
1	Water supply during construction of the site will require approximately 24m3 of potable water per day over each 24 hr period.	Information has been provided to the Applicant about the process for making requests for water supply for both domestic and non-domestic purposes.	Confirmation has been received on 12/09/2025 from AWS through a pre-application planning enquiry that the required flow rate is [approved / acceptable] for this stage of the Proposed Development. A formal application will be made to AWS prior to construction and to seek formal approval as the advice received is currently valid for 12 months. Contact will be maintained with AWS throughout the pre-construction process to ensure water supply remains available.	Agreed subject to final approval
2	During construction the site will require approximately 20m3 of foul water discharge per day over each 24-hr period.	Details on the process for engaging with AWS on any sewage connection requirements have been provided to the Applicant. AWS wishes to clarify that it should not be implied or agreed that any wastewater collected by a licensed waste carrier will be received at one of its sites for processing. AWS has reviewed recycling centres during a pre-planning enquiry and recommends tankering flows to North Marston STW, this centre currently has capacity but is subject to change depending on volume of applications. Whilst we note there may not be a requirement for a mains connected foul drainage system on a temporary or permanent basis, the Draft DCO (APP-013) does include supplemental powers in Part 4(18) with a general right to connect to any AWS assets. As the drainage strategy will not be confirmed until the detailed design stage, we should be a named consultee under Part 9 Schedule 2 Requirements of the draft DCO to ensure that there is the ability to work to find a sustainable solution to drainage (both foul water and surface water) under these circumstances. Please note this Requirement currently does not list any consultees regarding the discharge of the drainage strategy. On this basis, it is appropriate and proportionate to require formal consultation with AWS under the Requirements on the detailed	The recycling centres capacity have been reviewed but advice received on 12/09/2026 that there is capacity to discharge at the local recycling centre is only valid for 12 months. Another formal application for disposal capacity at the local recycling centre will be requested at the next stage of the project prior to construction. The Applicant has updated Schedule 2 of the draft DCO [EN010158/APP/3.1.3] submitted at Deadline 1 to add AWS as a consultee in respect of the written details of the drainage strategy to be approved under Requirement 9(1). Please refer to the Applicant's response to AWS's RR-012 in the Applicant's Response to Relevant Representations [PDA-006].	Agreed subject to final approval

R ef	Description of Matter	AWS Position	Applicant's Response	Status
		drainage strategy, if a connection to our assets is required. See also under other topic ref. 5 below concerning surface water drainage.		
3	<u>Interfaces between the project and AWS assets (underground and surface assets)</u> Further surveys of existing and proposed new assets to be brought forward during the Asset Management Period 8 (AMP8) may be required prior to detailed design. AWS recommended conducting a clash detection and technical assurance review in relation to their assets.	Prior to any site works AWS will be consulted for approval and Risk assessment and Method statement shared. Watching brief may be required. Due to HS2 works in the area, the status, size and location of our pipes is also subject to change. The stated standoff buffers set out in the Protective Provisions may need be revised to account for this. Further discussion is required between AWS and the Applicant to confirm these aspects, for example, trenchless crossings, ducting, open cut locations, access works, likely diversions, any above ground plant, and shared access locations. These matters should be addressed in supporting documents and will need to be amended accordingly as these matters are agreed.	A clash detection can be completed during the detailed design process post-DCO decision. The existing utility search information that has been used to date is considered proportional and relevant to the current stage of the Proposed Development's design. Protective provisions which set out protections for AWS assets are also in the process of being agreed with AWS. These protective provisions would be included in the draft DCO.	Agreed
4	Bespoke Protective Provisions for AWS to be included in draft DCO.	AWS has raised an objection to the DCO application as bespoke Protection Provisions have not been included. The "standard" set of protective provisions for the benefit of statutory undertakers contained the draft DCO fall short of providing AWS with the necessary protections. Engagement is therefore required to reach agreement with protective provisions for AWS assets.	The Applicant is currently negotiating bespoke protective provisions with AWS which would be included in the draft DCO. AWS provided the Applicant with a copy of its standard form protective provisions and the Applicant reviewed this document and returned comments on 2 February 2026. Negotiations are progressing positively and the parties will continue to progress negotiations to reach a mutually acceptable position on the remaining issues. The Applicant is confident that the protective provisions will be agreed before the end of examination. The Applicant considers that the bespoke protective provisions will provide adequate protection to AWS. and enables land and rights to be acquired for the Proposed Development without serious detriment to the carrying on of AWS's undertaking.	AgreedOngoing
5	A full boundary check to obtain accurate account of AWS land interests across the order limits is required.	The Applicant should carry out a full boundary check to <u>Interfaces between the project and AWS assets (underground and surface assets)</u> reflect an accurate account of AWS's land interests within the Proposed Development's Order Limits are recorded. and update the	The Applicant has refreshed its Land Registry searches and can confirm that there are no registered AWS interests missing from the DCO documentation. However, further discussions will take place with AWS to discuss any specific interests they think may be unaccounted for.	Agreed

Ref	Description of Matter	AWS Position	Applicant's Response	Status
		relevant documents if required. Whilst land investigation questionnaires (LiQs) relating to AWS's above ground assets and formal easements have been completed previously, these documents highlight a requirement for temporary possessions and permanent acquisitions near to some of our existing operational sites e.g. No.ECL/3A/1 at East Claydon which require further discussion.	AWS are identified in the Book of Reference as the freehold owner of Plot 7/6 where the permanent acquisition of new rights was required. On further review, and given the size of this plot, the Applicant has determined it does not require rights over this plot. Plot 7/6 has been removed from Book of Reference submitted at Deadline 1 because it is not longer Order Land (but notes Plot 7/6 remains within the Order Limits). Land plans have been updated for deadline 2 submission. Land Plans [EN010158/APP/2.2.4]	
6	Connection into a public sewer network for surface water flows	AWS requests the Applicant to confirm that it does not require a connection into the public sewer network to manage surface water flows. Notwithstanding the lead roles of the Lead Local Flood Authority and the Environment Agency, AWS would welcome clarification on how consequent impacts on the local drainage/ sewerage network will be designed as part of the Proposed Development.	The Applicant confirms that no surface water runoff is proposed to any AWS sewer assets as part of the Proposed Development. The Applicant notes that there are no AWS sewers located in the immediate vicinity of the Proposed Development that should be impacted. The Applicant has updated Schedule 2 of the draft DCO [EN010158/APP/3.1.3] submitted at Deadline 1 to add AWS as a consultee in respect of the written details of the drainage strategy to be approved under Requirement 9(1). Please note that the surface water strategy is included in the Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]. Requirement 9(2) of the draft DCO [EN010158/APP/3.1.3] states that the written details of the drainage strategy must be substantially in accordance with the Outline Drainage Strategy. Accordingly, consultation with AWS on the written details of the drainage strategy will include consideration of the surface water strategy. Please refer to the Applicant's response to AWS's RR-012 in the Applicant's Response to Relevant Representations [PDA-006].	Agreed
7.	Framework management plan documents	AWS notes the submission of framework documents covering – construction/ operation/ de-commissioning environmental management plans; and construction traffic management plan. AWS would welcome specific reference on how the interfaces with utility assets such as for sewers and water supply within the Order Limits will be managed through the construction of haul roads and bellmouths. Whilst Protective Provisions should address those interfaces with our assets, AWS would welcome further discussion with the Applicant	The Applicant acknowledges AWS's comments regarding Requirements 11, 12, 13 and 18 of Schedule 2 of the draft DCO [EN010158/APP/3.1.2] [AS-010]. The Applicant and AWS are currently negotiating bespoke protective provisions for the protection of AWS which would be included in the draft DCO. Please see the Applicant's response at Ref 4 above for a summary of these negotiations. Wording within the relevant management plans will be added for Deadline 3 submission to read "<i>Engagement with Anglian Water Services and other utilities services where necessary,</i>	Agreed

R ef	Description of Matter	AWS Position	Applicant's Response	Status
		regarding such matters and their inclusion in the final versions of these documents. These documents should include steps to remove the risk of damage to AWS assets from plant and machinery (compaction and vibration during the construction phase), including any haul and access roads and crossings. AWS would seek to ensure that 24 hours/ 7-day access to our assets is not compromised and, therefore, would welcome further discussion with the Applicant regarding such matters and their inclusion in the finalised documents. AWS reserves its position on the need to be included as a consultee to these detailed management plans, under the discharge of requirements relating to these under Schedule 2 – Requirements within the DCO Order (11) Construction environmental management plan; (12) Operational environmental management plan; (13) Construction traffic management plan; and (18) Decommissioning and restoration.	<i>will be undertaken on a regular basis to ensure their access to their existing and new assets is available throughout the construction period. This is with reference to, but not exclusive to XXXXXX (insert as applicable). This is to ensure their statutory obligations to their customers are met.”</i> These bespoke protective provisions would address and manage interfaces between the Proposed Development and AWS assets within the Order Limits (including with respect to the construction of haul roads and bellmouths). The bespoke protective provisions would also appropriately protect AWS's ability to access its assets. The Applicant will be required to comply with these protective provisions as part of the draft DCO. Accordingly, the Applicant considers that there would be no additional benefit in repeating information related to the management of any interfaces between AWS assets and the Proposed Development in the relevant outline management plans. Further engagement with AWS would be undertaken prior to commencement of construction activities to identify utilities and agree safe methods of working around existing utilities. Offsets around major utilities would be implemented, as agreed with each utility owner, to avoid impacts. The Outline CEMP [EN010158/APP/7.2] [APP-138] contains information and measures for protection of underground utilities and further detail would be contained within the detailed Construction Environmental Management Plan following further engagement with AWS and detailed design.	Closed
8.	Water Resources Assessment (WRA)	A WRA has not been included with the application, as requested by both AWS and the Environment Agency, in order to provide clarity on what the water requirements for the Proposed Development are and what assumptions have been made. This is relevant to all stages of the Proposed Development – construction, operation and decommissioning. It is considered that the need for water (domestic and non-domestic purposes) and for the different stages of the Project is not adequately addressed in the ES with regard to water resources.	An assessment of water resources has not been undertaken as water resources has been scoped out of the Environmental Statement, as detailed within ES Volume 4, Appendix 5.1: EIA Scoping Report [EN010158/APP/6.4] and agreed by PINS within ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4] due to impacts to foul, potable and private water supplies being considered negligible.	

5. Signatures

This statement of Common Ground is agreed upon:

On behalf of Anglian Water Services Ltd

Name:

Signature:

Date:

On behalf of the Applicant

Name:

Signature:

Date:



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