

DCO Application by Rosefield Energyfarm Limited
for the Rosefield Solar Farm
(EN010158)

Comments on Deadline 6 Submissions

8.4.2 Applicant's Response to Deadline 5 Submissions (REP6-070)

Document Ref.	Summary position	My Further Comments
3.14 REP6-070 Re: [REP5-120] epage 1, Ref. 1	Comment requesting that the Applicant provide the results from a National Grid trial trenching investigation in Fields SA51-59 and E20 22, in order to gain a more complete picture of the archaeological situation and the potential results. The Applicant states they are unable to provide a report produced by a third party that has not been made available to the Applicant and is not yet in the public domain.	It is noted that Table 1 in REP6-026 records 36 meetings and one email exchange between the Applicant and NGET since December 2023, the most recent being an in-person meeting on 16th July 2026. Given the mutual interest of the two parties in Fields SA51-54 and SA57.59, it seems inconceivable that the results of the archaeological investigations were not discussed at one or more of those meetings. These fields are of mutual interest to both parties in that they are the proposed location of a new substation for the National Grid (on which the Applicant's scheme is wholly dependent) and they fall within the Applicant's Order Limits. Furthermore, they may hold valuable information on Iron Age and Roman activities on the area (including the key question of the former Roman Road). The results of the archaeological study would make a key contribution to determining the weight of the planning balance with respect to heritage assets and thus should have been presented during the examination.
3.15 REP6-070 Re: [REP5-120] , epages 1 and 2, Ref. 2.	Comment that the Applicant should have also included the Grade II listed White House and its associated listed wall in their cultural heritage assessment, alongside the Grade II* listed St Mary's Church.	The Applicant asserts that, "<i>It (The White House) is not however prominent in views of East Claydon from the east due to the topography and the presence of significant mature vegetation within its garden.</i>" Contrary to that statement, it is clear to anyone approaching the village along East Claydon Road from the east that, together, the White House and St Mary's Church are the dominant features on the ridge and have been so for over four centuries. Fig. 179b in 6.3.4 Environmental Statement Volume 3 Cumulative Figures 17.1 – 17.10 (Revision 4). [REP5-042] further confirms the intervisibility of the Applicant's and other schemes with the White House. [See also photo below].

In addition, they are the first buildings to be seen as one rises up Sion Hill. The settings of both Listed buildings would indeed be significantly changed by the Applicant's scheme, both alone and cumulatively with other electrical infrastructure projects, notably the Staterra East Claydon BESS and the proposed replacement National Grid substation,



St Mary's Church (Grade II*) and the White House (Grade II) viewed from the east across the site of the former Medieval platform village

3.18 [REP6-070}
Re: [REP5 120],
epage 2, Ref. 4

Comment questioning whether the Applicant undertook counts of non-motorised road users as part of its transport assessment.

The Applicant continues to evade answering the question about numbers of non-motorised users (especially cyclists) of roads along the proposed construction traffic route, although the lack of information on pedestrians is now acknowledged.

It must be concluded that no count has been made of cyclists, despite this being a popular route for cycling. Given the Applicant's reluctance to engage on this point, there must be grave concerns over the safety of all non-motorised road users on the proposed construction traffic route.

6.4.3 Environmental Statement Volume 4 Appendix 15.1 Transport Assessment (Revision 3) REP6-051

Document Ref.	Summary position	My Further Comments
Paras. 4.2.5. 4.2.6, 4.2.7 (REP6-051)	Addition of a further, permanent site entrance from East Claydon Road.	The Applicant has made a further, eleventh-hour change to the design and operational layout of their scheme. Throughout the DCO application and examination process, the Applicant has maintained that the site entrance from East Claydon Road, leading across Fields SA55 and SA56 was to be used exclusively for the delivery of equipment requiring transport by AILs during the construction period. Thus, the haul road would be a temporary measure. They are now suggesting (Paras. 4.2.5, 4.2.6, 4.2.7 (REP6-051)) that this should be permanent, with a view to cars and LGVs using it for access to the site during the operational phase. Corresponding changes have been made to the Draft DCO (Limits of Deviation (Part 6: 50)). This is a major change to the scheme. It means that: • a permanent roadway would have to be constructed, despite having provided no details of its form, its route or how it would traverse the Claydon Brook; • the roadway would cross fields that are subject to severe flooding but for which no proper flood risk assessment has been made or drainage scheme provided; • ExA would be required to approve a proposal for construction of a roadway across fields that have not been subject to any environmental surveys and so the potential for harm has not been assessed; • there is no clarity as to how this would operate in tandem with Statera, which plans to use the same location as its temporary haul route for construction traffic; • no clear analysis of cumulative impacts on traffic flows has been undertaken. This is yet another example of the Applicant's cavalier approach to the design of a scheme that lacks forethought or understanding of the environment in which they seek to operate.

I maintain my position that the Applicant has failed to demonstrate that any positive weight afforded to their proposal to develop a sustainable energy generating plant is outweighed by the negative impacts on (a) the environment including:

- visual impact on landscape
- key endangered/protected species [including but not limited to Bechstein and barbastelle bats, skylark, golden plover, lapwing and great crested newt];
- residential and recreational amenity;
- heritage assets;

- transport and highways;
- flood risk and water management;
- cumulative impacts on each of these elements with other local electrical infrastructure projects.

and (b) negative socio-economic effects including:

- serious harm to a nationally-critical, local business that provides essential diagnostics products to the NHS;
- loss of residential and recreational amenity through harm to the landscape and the value of the local PRow network;
- harm to local agricultural businesses and loss of multi-generational skills and experiencing in managing the land;
- effectively permanent (up to 50 years) disruption to local communities through the loss of amenity and interdependencies with local agriculture;
- cumulative impacts on each of these elements with other local electrical infrastructure projects.

Dr Chris Jordan

August 2026

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