

Date: 23 January 2026  
Our ref: 532483  
IP ref: [REDACTED]  
Your ref: **EN010158**



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## BY EMAIL ONLY

Dear Sir/ Madam

**NSIP Reference: EN010158**

### The Examining Authority's questions on relevant representations

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is pleased to provide our answer to the Examining Authority requesting further information on our relevant representation.

*Natural England (NE) [RR-203] NE have raised some concerns regarding the ES and supporting ecological survey work. The ExA highlights that NE makes comments on the submitted bat surveys and field parcel analysis, and NE recommends removal of proposed infrastructure from fields B6, B7 and B8. Regarding the acceptability of the bat surveys in field parcels B7 and B10, the ExA notes that NE advises that it is working with the applicant to address the issues identified.*

**Response required from NE:** confirm what changes you consider should be made to the bat surveys for field parcels B7 and B10, and how you anticipate this could change the conclusions of the assessment.

### Clarifications / Errata

Our relevant representations [RR-203] described field parcels B7 to B10 as 'cattle grazed' in error. Fields B9 and B10 are currently under arable cultivation, while parcels B6, B7 and B8 are grassland, with B6 and B8 cattle grazed. It is the installation of panels in fields B6, B7 and B8 with which we are concerned. We apologise for this error.

### Importance of Parcels B6, B7, B8

Grassland fields B6, B7 and B8 have been identified as part of the core sustenance zone for Bechstein's bats during radiotracking surveys undertaken to inform the adjacent HS2 development and collated to inform the proposed SSSI extension. These areas have, alongside other areas outside of the order limits, been described in The Bernwood Population of Bechstein's Bats Non-Technical Summary of the Evidence (NECR558; 2024) as 'one of the most frequently used non-woodland core foraging areas'. This data has been

recognised by the applicant in correspondence with Natural England and reported in the Environmental Statement (see Table 7.1 pg16. Natural England Microsoft Teams meeting on 11 November 2024, point 2, as well as paragraph 7.5.96), alongside reporting on the difficulties accessing and surveying this area specifically to inform the Rosefield development. Some minimal acoustic survey of this area has been carried out, but only very few static detectors were deployed to cover this area and a transect route only very partially bisected it. *Myotis* bats were recorded during these surveys. However, it is not possible to specifically survey for Bechstein's bat using acoustic methods as they are a very quiet bat (and therefore not representatively recorded acoustically) and their calls are not readily distinguishable from other *Myotis* species with any level of certainty. Where acoustic survey is used, it can only be considered alongside more appropriate methods (such as radiotracking) and be assumed that all *Myotis* calls have the potential to be Bechstein's bats and that a proportion of calls will inevitably be missed by detectors. This would be especially true where bats may be utilising open space and detectors are located along field boundaries.

Although recognising the importance of this area and habitat type (grazed pasture compared to arable habitat) in correspondence with us, and specifically referencing some of the findings of the HS2 radio tracking surveys regularly within the ES, the impact of habitat loss in these fields is not considered. Frequently used parts of the core foraging area are not specifically mentioned within the ES, and the value of fields B6, B7 and B8 not confirmed nor are the potential impacts avoided.

In summary, we have evidence this area is important, and the survey data has not disproved this. The minimal additional acoustic data that has been gathered for this area has recorded *Myotis* bats using both hedgerows and open space, with survey unfortunately only able to be conducted when livestock were not present. The potential value of these grazed and rough grassland fields has not been adequately recognised or assessed in the ES.

### **Survey Recommendations**

Trapping and radio tracking surveys were not proposed by the applicant to inform this development, and we did not advise that this should be rectified, as although this could have given more up-to-date and species-specific data on Bechstein's bat to inform this development, this local population has already been subject to intensive and repeated radio tracking to inform the adjacent HS2 development. Radiotracking bats and the method of capture needed to do this using acoustic lure and harp traps/mist nets is highly invasive, and Natural England control the number of licenses issued for this reason. The HS2 data included radiotracking in the years 2012-2015, 2017-2018 and 2022 and we would not have wanted to increase pressure on this vulnerable population if the Rosefield development proposed radio tracking, as the population are already subject to this invasive survey method. The HS2 data was also used collated to inform the SSSI extension proposals, demonstrating the value of this area to Bechstein's bats.

You have asked us specifically what changes we consider should be made to the bat surveys for field parcels B7 and B10. The only way to gather more information about the use of this area (including field B6) for Bechstein's bat specifically, would be to undertake targeted trapping and radio tracking. A full season of survey would need to cover the period May to September and require gathering data pre- and post- maternity as a minimum, with a third period assessing activity patterns during autumn dispersal also of interest as it helps to build up a picture of how and when bats are using different habitats and features of the landscape.

However, we are not recommending this is carried out, as the value of this area for Bechstein's bats has already been demonstrated and we do not want to subject the local population to further disturbance from this invasive technique, especially as HS2 are

proposing further ongoing radiotracking for monitoring purposes and a data sharing agreement has been outlined in the monitoring strategy for Rosefield.

In terms of how we anticipate any further survey could change the conclusions of the assessment, we are not seeking to request further radio tracking survey for the reasons given above, however, if conducted it would continue to help to build up a picture of how Bechstein's bats are using the site, especially if conducted when cattle grazing is active on pastureland (B6 and B8) and rough swards are coarse and unmanaged (B7). It may also identify additional roosts that were not previously identified (with access permission possible to different areas and a different subset of bats being followed – radiotracking only ever provides a snapshot of what a few bats are doing over a short period of time). Therefore, although these data would contribute to what is known about this population, it would not supersede what has already been discovered and therefore the overall conclusions are likely to remain the same i.e. There is an isolated and genetically distinct, therefore vulnerable, population of rare Bechstein's bats present in this area that have the potential to be adversely affected by the impacts of development.

We advise that everything possible should be done to avoid this impact, such as retaining areas of value, including both woodland, hedgerow and open areas, and locating measures to mitigate for loss of lower value or less used habitats/areas in the best possible locations. It is for this reason that we did not ask for further survey effort, but have instead recommended that panels are removed from B6, B7 and B8, which would not only avoid impacts of loss of this area, but also provide a suitable grazed, sheltered and connected location where habitat enhancement measures could be used to mitigate/compensate for impacts elsewhere. Given the National importance of the population, the unknown efficacy of the mitigation measures proposed and the existing pressures on this population from development, our recommendation is for avoidance as opposed to additional surveys.

We hope that this is a useful clarification on the contents of our relevant representation.

If you have any further questions please contact the case officer [REDACTED] [\[REDACTED\]@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk) and copy to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

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