Submission ID: S4C9661DD

Summary of BBOWT's written submissions:

BBOWT strongly opposes the siting and scale of the proposed Rosefield Solar Farm. We recognise the need for renewable energy, but this particular scheme sits within one of southern England's most ecologically valuable landscapes, adjacent to multiple ancient woodlands and within the Bernwood Biodiversity Opportunity Area (BOA). In BBOWT's view, the proposals risk fragmentation of habitats, significant adverse effects on bats and birds with uncertain long term outcomes for biodiversity. Where harm cannot clearly be avoided or convincingly mitigated, we contend that national and local policy dictates the proposal should be refused.

Location and landscape context

Our principal concern is site selection. The development envelope sits in a landscape that is one of the best remaining ecologically important landscapes in southern England, with nationally important features including ancient woodland, species rich meadows, and notable invertebrates and bats (including Bechstein's and barbastelle).

Critically, the scheme is adjacent to a cluster of Sites of Special Scientific Interest (SSSIs) and Local Wildlife Sites (LWSs)—including Finemere Wood SSSI, Sheephouse Wood SSSI, and several ancient woodland LWS blocks—forming relics of the historic Bernwood Forest. These woodlands are irreplaceable and support complex, diverse ecological communities that depend on landscape permeability; fencing and dense arrays risk severing ecological connectivity between these core habitats.

Insufficient buffers to ancient woodland

Although the applicant has proposed buffers to designated woodland, the minimum 30 metre offset is inadequate. We seek a minimum 50 metre buffer, and potentially more where disturbance could be significant, to protect woodland function, edge habitats, and dependent species.

Fragmentation risks and bat ecology

We consider the wider landscape around the site to be of exceptional significance for bats, comprising a nationally important assemblage and including rare Bechstein's and barbastelle. There is intense bat activity along hedgerows and field boundaries, many of which function as key commuting and foraging corridors. We are particularly concerned about Fields D28 and D29, positioned between Runts Wood and Finemere Wood. Survey mapping indicates these fields sit within critical flight lines; we therefore request removal of PV arrays from these parcels and their dedication to biodiversity compensation to sustain connectivity between the two woodland blocks.

Beyond D28/D29, we seek wider "green corridors" along all key/anticipated bat routes. The currently proposed 10 metre offsets from hedgerows are insufficient. Recent research suggests reduced bat activity and altered feeding behaviour at solar farms - given the site's sensitivity, there is a realistic risk of significant harm that cannot be treated as de minimis. Where such harm cannot be clearly avoided or mitigated permission should be refused.

Ground nesting and wintering birds

We dispute the finding of no significant residual effects for ground nesting and other bird groups. The scale of array coverage over open arable fields will likely eliminate most skylark territories (a red list, Species of Principal Importance) because skylark avoid nesting near field boundaries and tall structures, not just directly under the modules. The applicant's assumption that only territories directly beneath panels are affected severely underestimates impact, and proposed compensation via limited creation of species rich grassland is unlikely to be adequate.

Evidence base: out of date or insufficient surveys

Several core surveys were undertaken in 2022–2025, with many now approaching or beyond typical two year validity windows, and some carried out outside optimal seasons—all of which undermines confidence in the current ecological baseline. In our detailed response we also flag missing or inadequate surveys for terrestrial invertebrates (noting likely importance for black/brown hairstreak and saproxylic assemblages) and reptiles, arguing that effects cannot credibly be deemed "not significant" without targeted survey data and population informed mitigation.

Biodiversity Net Gain (BNG)

BBOWT welcomes the use of the statutory BNG metric and notes headline claims of >10% net gain across habitats/hedgerows/watercourses. However, we have concerns over: (1) unreliable baselines (timing, adequacy, and transparency—e.g., lack of quadrat counts underpinning grassland condition); (2) classification inconsistencies (e.g., "other neutral grassland" versus "legume rich modified grassland" under panels) that materially change unit calculations; and (3) uncertain deliverability - especially where "good condition" is claimed at scale without site specific, condition targeted prescriptions. Clear, habitat specific management and condition targets must be defined now, not deferred to a future detailed LEMP.

We also object to any sale of "excess" on site BNG units, as this could undermine mitigation hierarchy integrity if habitats are already performing as compensation for protected species.

Long term stewardship and decommissioning

Although the Outline LEMP suggests management during operation and some monitoring beyond the 30 year BNG maintenance window, BBOWT notes no firm commitment that created habitats will be managed in perpetuity after decommissioning. With land anticipated to revert to owners and no guaranteed mechanism to sustain ecological value, we regard long term delivery as uncertain, which weakens the credibility of claimed net gains and mitigation.

Policy framework and the mitigation hierarchy

The mitigation hierarchy requires the avoidance of impacts first (including alternative siting), then mitigation, and only as a last resort compensation. Where significant harm remains likely or cannot be clearly ruled out (notably for bats, ancient woodland, and ground nesting/wintering birds), permission should be refused. Given the uncertainty in the evidence base and the sensitivity of the receiving environment, the precautionary principle requires that the solar farm should not proceed at this location.

Cumulative effects with HS2 and East West Rail

The landscape is already heavily pressured by HS2 and East West Rail, which intersect near the site and have left huge scars and fragmented habitats. Adding another major infrastructure project risks compounding fragmentation, when the priority should be repairing and reconnecting this fragile ecological network. BBOWT is especially concerned that cumulative effects - together with other developments captured in the project's cumulative assessments - could be colossal for local biodiversity.

Bernwood Biodiversity Opportunity Area (BOA)

The entire site falls within the Bernwood BOA, identified as regional priority for restoring biodiversity at landscape scale. The proposal jeopardises the BOA aims to extend and link priority habitats, contrary to local policy which states that development preventing BOA objectives will not be permitted. In BBOWT's view, a landscape scale conservation focus is fundamentally incompatible with inserting a very large fenced solar array complex in this location.

Overall conclusion

BBOWT's case rests on siting, scale, sensitivity, uncertainty, and policy:

- Siting & Scale: A very large, ground mounted solar scheme adjacent to ancient woodland complexes in a regionally significant ecological network is, in our view, the wrong project in the wrong place.
- Sensitivity: The area supports nationally important bat assemblages, priority bird species, and irreplaceable habitats, all potentially vulnerable to fragmentation and operational disturbance.
- Evidence Gaps: Out of date/season surveys, missing invertebrate and reptile data, and classification inconsistencies in BNG undermine confidence in impact assessments and claimed gains.
- Mitigation Uncertainty: Proposed offsets and management are insufficiently specific or ambitious, particularly for bats and skylarks, with no guarantee of perpetual stewardship after decommissioning.
- Policy Tests: Where significant harm cannot be avoided or robustly mitigated, planning policy points to refusal; the precautionary principle should apply given the scale of uncertainty and the high value of the receiving environment.

BBOWT accepts the imperative for renewables, but we conclude that Rosefield Solar Farm, as located and designed, carries unacceptable risks to biodiversity.