

Date: 09 March 2026  
Our ref: 542276  
IP Ref: [REDACTED]  
Your ref: EN010158



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**BY EMAIL ONLY**

Dear Sir/Madam,

**NSIP Reference: EN010158**

**Natural England's Written Representations in respect of Rosefield Solar Farm**

**Examining authority's submission deadline: 10<sup>th</sup> March 2026**

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.

For any further advice on this consultation please contact the case officer [REDACTED] [REDACTED]@naturalengland.org.uk) and copy to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

[REDACTED]  
Senior Officer  
Thames Solent Area Team  
Natural England

## **WRITTEN REPRESENTATION**

PART I: Summary and Conclusions of Natural England's advice (starting at page 3).

PART II: Natural England's detailed advice (starting at page 6).

# Natural England's Written Representations

## Part I: Summary and Conclusions of Natural England's advice

### Summary of Natural England's Advice

The proposed development is in a highly ecologically sensitive landscape which supports internationally rare bat populations. Natural England are concerned that, without proper mitigation, the development could result in an adverse impact on Annex II bat species.

In our relevant representations [RR-203] we explained that we thought there were areas where the mitigation should be improved. We have since provided representations [AS-038] explaining why our concerns can not be addressed by further survey effort.

We now have a better understanding of the Applicants approach to the mitigation strategy following direct discussion, the drafting of the statement of common ground, and from reviewing their response to relevant representations [PDA-006].

While the majority of our recommendations have been adopted or accepted, our concerns regarding the impacts to bats from developing the grassland field parcels between Sheephouse Wood and Shrubs Wood remain.

We expect that an agreed statement of common ground will be submitted by the Applicant at Deadline 1.

We have not produced a principal areas of disagreement (PADS) during the pre-examination period. In response to the Rule 6 letter, we have produced a PADS which has been submitted with this WR at Deadline 1.

We have not provided any further comments on the draft DCO.

Natural England's advice in these written representations is based on information submitted by Rosefield Energyfarm Limited (The Applicant) in support of its application for a Development Consent Order ('DCO') in relation to the development of a solar and energy storage Project ('the Project').

Part I of these written representations provides a summary (above) and overall conclusions of Natural England's advice.

Natural England will develop these points further as appropriate during the examination process. We may have further or additional points to make, particularly if further information about the Project becomes available.

Our comments are set out against the following sub-headings which represent our key areas of remit as follows:

- International designated sites
- Nationally designated sites

- Protected species
- Biodiversity net gain
- Nationally designated landscapes
- Soils and best and most versatile agricultural land
- Ancient woodland and ancient/veteran trees
- Connecting people with nature (National Trails, open access land and England Coast Path)
- Other valuable and sensitive habitats and species, landscapes and access routes

Our comments are flagged as red, amber or green:

- **RED** are those where there are fundamental concerns which it may not be possible to overcome in their current form.
- **AMBER** are those where further information is required to determine the effects of the Project and allow the Examining Authority to properly undertake its task and or advise that further information is required on mitigation/compensation proposals in order to provide a sufficient degree of confidence as to their efficacy.
- **GREEN** are those which have been successfully resolved (subject always to the appropriate requirements being adequately secured)

Natural England consider all matters **GREEN** aside from Protected Species. Our position on the status of these issues has **not** changed since submission of our relevant representations [RR-203].

### **International designated sites – GREEN**

Natural England's position regarding internationally designated sites has **not** changed since submission of our relevant representations [RR-203].

### **Nationally designated sites – GREEN**

Natural England's position regarding nationally designated sites has **not** changed since submission of our relevant representations [RR-203].

### **Protected species - AMBER**

While Natural England's material position regarding protected species has **not** changed since the submission of our relevant representations [RR-203] we provide further advice on this matter in Part II of this letter.

### **Biodiversity net gain – GREEN**

Natural England's position regarding biodiversity net gain has **not** changed since submission of our relevant representations [RR-203]. We are not expecting to provide detailed advice on BNG.

### **Nationally designated landscapes – GREEN**

Natural England's position regarding nationally designated landscapes has **not** changed since submission of our relevant representations [RR-203].

### **Soils and best and most versatile agricultural land - GREEN**

Natural England's position regarding soils and BMV has **not** changed since submission of our relevant representations [RR-203].

### **Ancient woodland and ancient/veteran trees – GREEN**

Natural England's position regarding ancient woodland and ancient/veteran trees has **not** changed since submission of our relevant representations [RR-203].

### **Connecting people with nature (National Trails, open access land and England Coast Path) – GREEN**

Natural England's position on connecting people with nature has **not** changed since submission of our relevant representations [RR-203].

### **Other valuable and sensitive habitats and species, landscapes and access routes – GREEN**

Natural England's position on other valuable and sensitive habitats and species, landscapes and access routes has **not** changed since submission of our relevant representations [RR-203].

## Natural England's Written Representations

### Part II: Natural England's Detailed Advice

Part II of these representations updates and, where necessary, augments the relevant representations. It expands upon the significant issues which in our view remain outstanding and includes our advice on pathways to their resolution where possible.

Natural England will continue engaging with the Applicant to seek to resolve these concerns throughout the examination. Natural England advises that the matters indicated as 'amber' will require consideration by the Examining Authority during the examination.

### Protected Species

#### Bat Species Assemblage

In our relevant representations [RR-203] we made seven recommendations for how the Applicant could address our concerns regarding the potential impacts to rare bat populations.

For the most part, these recommendations have been accepted by the Applicant with the exception of recommendations 1 and 6; panel allocations in fields B6, B7, B8 and measuring ecological buffers from the edge of existing hedgerows respectively. Our advice below is structured based on these seven recommendations.

#### *NE Recommendation 1 - Field Parcels B6, B7, and B8*

Natural England has consistently raised concerns about the loss of grassland field parcels close to Shrubs Wood, north of Sheephouse Wood. NECR558 describes the value of this area, which the Applicant has both recognised [PDA-006 page 212] but also downplayed, describing the area as 'intensively managed and species-poor', and grazed by 'a non-organic cattle herd'. We have provided extensive commentary in our relevant representations on why there is insufficient evidence provided to discount the value of this area. Current best available evidence shows that this is a valuable area, even with the current agricultural practice and we advise that a precautionary approach must be taken.

The Applicant has responded to our request to clarify the total areas of retained and enhanced grassland habitats and explained that there is roughly a 2x re-provision ratio for lost grassland habitat. As in our relevant representations [RR-203], we welcome the mitigation and habitat provision across the rest of the site. It should be noted that the bulk of the re-provided habitats are up to 3km away from Shrub's Wood. While it will likely function for the affected population, the loss of fields B6, B7 and B8 represent a significant change from the current conditions. We continue to advise that in order to ensure continuity of the existing habitat and distribution of foraging resources, that panels are removed from these fields.

The Applicant makes a distinction between buffers being provided for connectivity and grassland being provided for habitat, so 'establishing 15m buffers between Sheephouse Wood and Shrubs Wood is adequate to ensure connectivity'. While acceptable at face value, this is not a very nuanced approach. This part of the landscape offers a different resource from habitat elsewhere, it is largely low lying and therefore sheltered by Sheephouse Wood, which will influence invertebrate movements and congregation. When looking at a landscape scale, there is grassland retained or created in the south and south-east of the development, but nothing else to the west or the north except field B17 which is much more exposed and is retained primarily for landscape, rather than ecological reasons. Whilst the two are compatible, this would not otherwise be a key area to set aside for mitigation for bats as it does not provide the linkages or sheltered foraging of B6, B7 and B8.

Another reason for retaining grasslands B6, B7 and B8 and utilising them for cattle grazing and habitat enhancements is the critical location in an area heavily affected by construction and operation of HS2. Leaving these fields undeveloped will complement the mitigation measures for HS2, maintaining and strengthening linkages between Sheephouse Wood, Decoy Pond Wood and Shrubs Wood to build resilience into the landscape for Bechstain's bats into the future. At present there are no known maternity roosts within Shrubs Wood or Decoypond Wood, only day roosts within the latter, but by maintaining and strengthening habitat linkages the future value of these woodlands is enhanced rather than diminished.

Removal of panels from B6, B7 and B8 would therefore not only avoid impacts of loss of this area, but, with appropriate management, would 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 still that development is reduced in this area.

#### *NE Recommendation 2 – Construction Impacts*

We look forward to reviewing the documentation which will be presented at Deadline 1 dealing with the risk of disturbance.

#### *NE Recommendation 3 – Buffer Management*

The Applicant has indicated that the Outline LEMP [APP-142] already accounts for our recommendation. Upon review of the LEMP, it appears that it has not been updated. Section 5.4.26 onwards on bats still describes the creation of species-rich grassland. Section 3.3.26 also highlights the creation of species-rich grassland for bats.

#### *NE Recommendation 4 – Mitigation Land Management*

We thank the Applicant for confirming that the 93ha of mitigation habitat will be cattle grazed. It would be reassuring if the Outline LEMP reflected a commitment to this, as opposed to only 'potential for grazing by sheep or cattle' (as per the plans in Appendix 2 Landscape and Ecological Mitigation and Enhancements) and 'cattle may be used to graze the larger grassland areas' (para. 5.2.4).

We look forward to the further documentation on the benefits of sheep grazing and how such conservation grazing beneath the PV panels will benefit bats.

We note that the LEMP states further detail on the timings and stocking densities of the grazing will be provided at the detailed design stage. The current version of the LEMP highlights the benefits of conservation grazing and the mapping includes areas 'with potential for grazing by sheep or cattle'.

Appendix 4 includes 'grazing options' for 'Neutral Grassland', and 'Species-Rich Grassland/Wildflower Grassland/Wetter Grassland' (which encompass the retained and created grassland fields) and the option is to use sheep or cattle at a low stocking density and moving stock regularly. Currently the management prescription for all grasslands, including the herbal leys beneath PV panels as well as the above listed grassland types, excludes any grazing in the summer months to allow plants to flower and set seed. However, for continuity in prey abundance for bats it would be beneficial to ensure that there is some grazing throughout the spring and summer as well, which could also be across rotationally managed areas so as to provide the varied sward that the LEMP is seeking to achieve, whilst avoiding a period when bats are breeding and livestock are not present.

We are happy to consider this matter resolved for now, but highlight the importance of proper management for the ecological functionality of the mitigation. We will be pleased to comment further at the detailed design stage where necessary.

#### *NE Recommendation 5 – Monitoring*

We look forward to reviewing the further information in the Outline LEMP on the proposed monitoring strategy. It should be noted that we are unlikely to have discussed this with the Applicant prior to Deadline 1 (which is indicated by the Applicant in [PDA-006]).

#### *NE Recommendation 6 – Mapping & Buffer Size*

The Applicant has indicated that they intend to measure the distance for establishing ecological buffer zones to be from the centre line of existing hedgerows [PDA-006] as opposed measuring a buffer zone from the edge of existing features.

As discussed in our relevant representations [RR-203], there is no scientific literature or best practice standard to demonstrate what width an effective mitigation buffer should be to maintain the functionality of a commuting route for bats, should the presence of solar PV panels or infrastructure create an avoidance effect. We are therefore accepting this mitigation measure in the absence of robust scientific evidence, on the assumption that the wider the offset between the landscape feature (i.e. hedgerow or woodland edge) and the anthropogenic structure, the more likely it is to prevent the avoidance effect, retain the value and support the continued use of the feature, thereby providing effective mitigation. Natural England have recommended that the buffers for known bat commuting routes and foraging areas are created based on measuring from the edge of existing hedgerows in line with the precautionary principle, so that the mitigation buffer is wholly additional to the feature itself. We advise that the existing material ecological baseline is maintained, and that the buffer expands upon this, otherwise there are diminishing returns with the size of the buffers – the wider the existing feature, effectively the smaller the buffer that protects it. One of the reasons that we have been specific in our recommendations regarding this, is that a number of these key hedgerows within the Rosefield red line boundary are in ecologically good condition. They are clearly regularly managed, but they have a wide framework structure to which they are cut back, and in many places within the arable landscape include an existing margin of hedgerow ground flora and rough grassland extending approximately 2m to 6m out from this woody structure. Cultivated arable habitat itself provides very little by way of resources for bats, however, it does not elicit an avoidance response. Should bats avoid solar PV and any associated infrastructure, maximising the distance between valuable habitat features and such an influence should be prioritised.

It is noted that in PDA-006 (and in a subsequent meeting with the applicant's Ecologists) the applicant suggests that something located beyond the audible range of bat detection equipment for a specific species is somehow of lower consequence for the bat, as it is outside of its detection range when it is travelling along close to a feature (such as a hedgerow). This is not a scientifically valid point, as we only know what we can detect with our equipment and software, and not what a bat can actually hear in the environment or returning from its own call. A bat will be fully aware of its surroundings regardless of whether it is a 'quiet' echolocating species. It is not known over what distance the presence of solar infrastructure can have an influence on bat activity, but it is certainly not influenced by how loudly or

quietly bats echolocate, and studies have found some of the greatest avoidance effect from the short-range and mid-range echolocators (Badouin *et al* 2026<sup>1</sup>, Tinsley *et al* 2024<sup>2</sup>).

It has been our belief that this would be the approach taken, and where we have buffer distances, our judgement was predicated on the buffer being an extension of the current hedgerow condition, and a meaningful extension of the baseline level of marginal ground flora.

While we accept that measuring from the centre line is a more practical or feasible way for these buffers to be created and mapped, we are disappointed by the reductive outcome of this approach. We therefore suggested that an easy way to resolve this discrepancy is to simply increase the minimum documented and mapped width for all buffers by, for example, 2m to counteract the incorporation of the average hedgerow width.

The Applicant's response [PDA-006] also discusses the 'additional 5m from the security fence to the panels' and notes that we do not lend value to this area. For the avoidance of doubt, one of the reasons for this is to ensure clarity of language, and to make it clear to all audiences which is the ecological buffer, and which is an 'inherent' gap from the fence to the panels to facilitate construction and allow adequate access for maintenance (which would be present regardless of any ecological constraints). Another reason is that this 5m access strip would sit independently of the LEMP and any associated requirements which dictate the conditions for establishment/monitoring of the buffer. We do accept this strip constitutes further physical distance between the solar panels and the hedgerow feature.

[PDA-006] also includes the following: '*along the Claydon Brook Fields E11, E20 and E21 where practicable the buffer has increased to 20m.*'. We recommend that this is strengthened and that the LEMP ensures the buffer distance at a minimum, as opposed to a buffer distance subject to practicability.

#### *NE Recommendation 7 – Lighting*

We thank the Applicant for their clarifications in [PDA-006] on this matter. We consider this matter resolved.

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<sup>1</sup> Badouin, A., Hette-Tronquart, N., Brun, C., Gay, N., Chartendrait, V., Kerbiriou C. (2026). Balancing renewable energy and biodiversity: Assessing solar farm effects on bat activity. *Biological Conservation* 314.

<sup>2</sup> Tinsley, E., Froidevaux, J. S. P., Zsebok, S., Szabadi, K. L. & Jones, G. (2023) Renewable energies and biodiversity: impact of ground-mounted solar photovoltaic sites on bat activity. *Journal of Applied Ecology* 60: 1752-1762