

South East and London Area Team

Bucks Horn Oak
Farnham
Surrey
GU10 4LS

Tel: 0300 067 4420

planningconsultationSEL@forestrycommission.gov

Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN
Rosefieldsolar@planninginspectorate.gov.uk

Submitted via the [Have your say](#) online function

22 April 2026

Dear Richard Morgan,

Your reference: EN010158**Site: Rosefield Solar Farm**

We would like to take the opportunity to provide feedback on two questions posed by The Examining Authority's first written questions and requests for information (ExQ1), issued on 2 April 2026.

Woodland buffers

Q1.7.19: *"In your relevant representation [RR-020] and written representation [REP1-125] you suggest that a minimum buffer distance of 50 metres is required to designated woodland. Whilst noting the study referred to in your relevant representation, this does not represent guidance or a legislative requirement. The applicant has based the minimum buffer distance on guidance from Natural England and the Forestry Commission – why is this not deemed sufficient?"*

Whilst we recognise that the applicant has considered the Standing Advice on buffer size we would encourage larger buffers in this case due to:

- the scale of the developmentthe local bat populations, particularly the presence of the rare woodland Bechstein's bat; and
- the emerging, yet limited, evidence on the impact of solar panels on bats.

Woodland bats are an indicator of overall woodland health and benefit the woodland ecosystem in a range of ways including pest control, seed dispersal and, in some cases, pollination. But bigger and better buffers will benefit a range of woodland species and help prevent the deterioration of these irreplaceable habitats. Buffers should serve a purpose and not just be area without anything in them, this prevents future misuse or encroachment.

A recent UK studyⁱ showed that ground-mounted solar photovoltaic developments have a significant negative effect on bat activity, findings that have also been demonstrated in Franceⁱⁱ.

Since the latter study indicates limited bat activity within 25m of solar panels, we would recommend an additional 25m buffer to separate the panels from habitat-rich woodland buffers, giving the bats the space and food sources for commuting and foraging along the woodland edge. Thus, our recommendation is for a 50m buffer to the ancient woodlands, comprising of:

- A 25m buffer adjacent to the woodland of high-quality habitat, including a mixture of scrub, species-rich grassland and scattered trees, this provides the space and food source for the bats to forage, protects the woodland from the indirect impacts of the development and can help mitigate the overall impact of the development. This buffer should not be used for access or storage.
- A 25m buffer between the habitat buffer and the solar panels, providing the distance required and protecting the habitat buffer, thus, enabling its benefits to be realised. This buffer could be used for access or maintenance.

Woodland creation

Q1.7.4: *"Are any areas of woodland proposed to be created? If not, why not?"*

Under the Environment Act 2021 there is a statutory national target to increase tree canopy and woodland cover to at least 16.5% of total land area by 2050, a challenging target that will require action throughout the nation.

We are concerned about the isolation and fragmentation of the ancient woodland across the area which woodland creation could address. The three woodland blocks to the west (Decoypond Wood, Sheephouse Wood and Shrubs Wood) are most likely to become more isolated based on the current proposal, particularly Shrubs Wood which would be entirely enveloped by solar panels and other infrastructure. It is well-known that isolation and fragmentation lead to woodland deteriorationⁱⁱⁱ; by causing a reduction in the fauna and flora migrating in and out of the woodland biodiversity declines, and consequently, woodland health and resilience decline too. Less resilient woodlands are then at greater risk to pest and disease, storms and droughts, leading to further deterioration. As ancient woodland is irreplaceable habitat, deterioration should be avoided at all costs.

We note that Natural England has recommended that solar panels be removed from parcels B6, B7 and B8. We support this recommendation because it would prevent the

further isolation of the western woodland blocks. Some woodland creation could be considered within these parcels, connecting the western blocks and potentially generating Biodiversity Net Gain units. These parcels are mapped as woodland measure M1 in the Local Nature Recovery Strategy (LNRS) for Buckinghamshire and Milton Keynes, this measure aims to “buffer and connect ancient woodlands, while preserving and enhancing other Priority Habitats such as chalk grassland, floodplain meadows”^{iv}.

Further guidance on policy and legislation relevant to ancient woodland is set out in the appendix to this letter.

If you have any questions regarding our advice or concerns that are not covered by the above, please contact us again.

Finally, AI has not been used in the generation of this letter.

Yours sincerely,



Local Partnership Advisor

Annex 1: Policy Framework, Related Guidance and Sources of Further Information

Policy and Guidance:

Keepers of Time – A Statement of Policy for England’s Ancient and Native Woodland (updated May 2022). Includes definitions of ancient woodland, ancient and veteran trees, and sets out the importance of these habitats.

Policy Principles and Strategic Objectives include:

- *Maintaining and enhancing the existing area of ancient woodland*
- *Conserving and enhancing the existing resource of ancient and veteran trees.*

National Planning Policy Framework (published July 2021)

Paragraph 180(c) – irreplaceable habitats.

Paragraph 131 – street trees, trees within developments, and retention of existing trees.

Standing Advice for Ancient Woodland and Veteran Trees (first published October 2014, revised January 2022)

This advice, issued jointly by Natural England and the Forestry Commission, is a material consideration for planning decisions across England. It provides advice on how to avoid and mitigate impacts, and on compensation schemes where the tests set out in the NPPF are met. The Standing Advice also includes an Assessment Guide, which can help planners assess the impact of the proposed development on the ancient woodland.

National Planning Practice Guidance – Natural Environment Guidance. (updated July 2019)

This Guidance outlines the Forestry Commission’s role as a non-statutory consultee and supports the implementation and interpretation of the National Planning Policy Framework in relation to ancient woodland and ancient and veteran trees, and clarifies that existing woodland condition should not affect the planning authority’s consideration of proposals.

Felling Licences and Environmental Impact Assessment

Felling Licences - Under the Forestry Act (1967) a Felling Licence is required for felling more than 5 cubic metres per calendar quarter. Failure to obtain a Licence may lead to prosecution and the issue of a restocking notice.

Environmental Impact Assessment - Under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999, as amended, some proposals involving afforestation, deforestation, forest roads or forestry quarries may require ‘stage 2’ Consent from the Forestry Commission before they can be carried out. For these project types the applicant should determine if their proposal needs Consent (referring to guidance as necessary), or approach the Forestry Commission for a ‘stage 1’ opinion as to whether or not Consent is required.

ⁱ Tinsley, E., Froidevaux, J.S.P., Zsebok, S., Szabadi, K. L. and Jones, G. (2023) Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity, *Journal of Applied Ecology*, Vol 60, Issue 9 pp. 1752-1762, accessed via:

<https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2664.14474>

ⁱⁱ Barre, K., Baudouin, A., Froidevaux, J.S.P., Chartendrault, V. and Kerbirou, C. (2023) Insectivorous bats alter their flight and feeding behaviour at ground-mounted solar farms, *Journal of Applied Ecology* Vol 61, Issue 2 pp. 328-339, accessed via:

<https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2664.14555>

ⁱⁱⁱ N. M. Haddad, L. A. Brudvig, J. Clobert, K. F. Davies, A. Gonzalez, R. D. Holt, T. E. Lovejoy, J. O. Sexton, M. P. Austin, C. D. Collins, W. M. Cook, E. I. Damschen, R. M. Ewers, B. L. Foster, C. N. Jenkins, A. J. King, W. F. Laurance, D. J. Levey, C. R. Margules, B. A. Melbourne, A. O. Nicholls, J. L. Orrock, D.-X. Song, J. R. Townshend (2015) Habitat fragmentation and its lasting impact on Earth's ecosystems. *Science Advances*, Vol 1, Issue 2, accessed via:

<https://www.science.org/doi/10.1126/sciadv.1500052>

^{iv} Local Nature Recovery Strategy for Buckinghamshire and Milton Keynes – Buckinghamshire & Milton Keynes Natural Environment Partnership