Date: 22 April 2026
Our ref: 546105
Your ref: EN010158
IP Ref: [redacted]

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FAO: Richard Morgan
Lead Panel Member

The Planning Inspectorate
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Dear Richard Morgan,

NSIP Reference: EN010158

The Examining Authority's first written questions and requests for information (ExQ1). Examining Authority's submission deadline: 22 April 2026

Natural England is pleased to provide our answers to the Examining Authority's First Written Questions within the annex appended to this letter. In response to the Rule 17 letter dated 10th April, please note that Natural England have used **no artificial intelligence** tools to develop any of our advice or to assist with any document review.

Natural England hopes our Deadline 2 answers are helpful. We have provided our response to ExQ 1 in a table as we understand this is the preferred format. If the ExA would prefer this response formatted in a different way, please let us know.

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 further advice on this consultation please contact the case officer [redacted]@naturalengland.org.uk and copy to consultations@naturalengland.org.uk.

Yours faithfully

[redacted]
Senior Officer
Thames Solent Area Team
Natural England

Annex 1: Natural England's response to the Examining Authority's (ExA's) first written questions (ExQ1)

ExQ1	Question to:	Question and Answer:
7. Biodiversity and Ecology		
1.7.1	Natural England, Buckinghamshire Council, Environment Agency, Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT), Claydons Solar Action Group (CSAG)	***General – review of deadline 1 documents*** *Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.*
		Summary We have reviewed the changes to the following documents submitted at Deadline 1: Outline Landscape and Ecological Management Plan (oLEMP) [REP1-086], Outline Construction Environmental Management Plan (oCEMP), and the new documents submitted: Applicant's response to relevant representations [PDA-0060] and Bat Technical Study [REP1-105]. The comments, amendments and newly submitted documents have **not** addressed our concerns regarding the impacts on ecology, namely potential impacts to rare bat species. The noise study has, however, largely addressed concerns over potential impacts of construction noise, subject to the oCEMP being updated to reflect the outcome of the study (i.e. measures taken to avoid disturbance effects for any roosting bats within 15m of haul routes and piling). Our advice concerning buffer widths and avoidance of impacts to grazed grasslands in the west of the site has not been fully accepted by the applicant, and our concerns have not been addressed. It is Natural England's view that the unless the layout of the scheme is adjusted to retain a large proportion of fields B6, B7 and B8, our fundamental concerns about the ecological impact of the scheme will not be overcome.

ExQ1	Question to:	Question and Answer:
		Bat Technical Study *Construction noise assessment* The noise assessment is welcomed and helps to clarify the potential for noise disturbance during construction. We generally accept the conclusions of the construction noise study, assuming that the equipment used is no more impactful than that used as examples in the noise study. However, there may still be trees with potential for roosting bats located 15m or less from construction of haul routes and access tracks. The oCEMP should be updated to include adequate consideration of this, as outlined in the Bat Technical Study and the applicant's response to Relevant Representations. Currently, only direct impacts such as where trees with potential roosting features are to be removed, are covered in the oCEMP. Table 1 of the Bat Technical Study highlights that no noise or vibration measurements are available for the specific plant which will be used to construct the proposal. The oCEMP states that a legally protected species plan will be produced and that this would be able to mitigate the potential impacts from change in noise. Once there is more information available about the plant and potential noise impacts, these should be considered in the protected species plan. RSK Biocensus have confirmed they have the relevant expertise and equipment to be able to undertake a noise study at the site. We recommend that a similar noise assessment is carried out during construction of the Rosefield development to further understand noise level impacts and guide future mitigation. *Operational noise assessment* The noise study on the operative Burwell Solar Farm suggests that although there are ultrasound frequency noises emitted by solar infrastructure during daylight hours, these are unlikely to be emitted at dusk and in the night when bats are active. We note the findings of this study with interest. We would also highlight this study was not carried out with the express purpose of identifying avoidance behaviour displayed by bats, and that the reason for this avoidance behaviour remains unknown. *Grazing study* It is acknowledged that, should sheep grazing beneath panels and cattle grazing of mitigation areas be possible, there would be potential for an overall increase in the size of grazed land and the total number of grazing livestock. As yet, however, this management method has not been confirmed or secured. Our advice is provided based on the assumption that this grazing **is** secured.

ExQ1	Question to:	Question and Answer:
		It is also acknowledged that sheep dung, as well as cow dung, supports a wide assemblage of beetles and flies, of which the latter are more likely to be providing prey for *Myotis* bats, such as Bechstein's. An unpublished study of the Bernwood population of Bechstein's using metabarcoding of DNA in bat faeces found that Diptera (flies) account for almost 40% of their diet. That study also found that although almost 70% of the overall diet is from invertebrate species associated with trees and woodland, over 32% comes from invertebrates that are associated with open space. This is of relevance to understanding bat usage of this development site as, not only is it the same population of Bechstein's bats in the study, the Rosefield development site encompasses open space between woodland habitats (J. Curry 2020 Unpublished study[1]). The Grazing Study concludes that, although multiple studies show a positive relationship between cattle and bats, the relationship between bats and sheep specifically has not been investigated. It goes on to state that by '*extrapolating from knowledge of the diet of Myotis species and the insect communities associated with sheep and sheep dung, it is possible to predict this relationship*'. The attraction of insects to livestock is a complex topic that is likely to be affected by other factors, such as stocking density and management and is a topic that warrants further study and investigation to inform land use planning and ongoing expansion of solar development but cannot be explored in any depth or certainty to inform this development specifically. There is a plethora of studies and other factors that have not been considered, for example, there are studies into the number of species and the abundance of certain flies (primarily biting midges; *Culicoides*) that are attracted to both sheep and dairy cows, which suggest that cows are a far stronger attractant, in terms of the number of different species and their abundance (Elbers and Meiswinkel 2015[2], and Ayllón *et al* 2014[3]). We do not, however, think it would be appropriate to enter into a potentially lengthy debate over the intricacies of livestock grazing and provision of foraging resources for bats as part of this examination.

[1] Curry, J. (2020) Bechstein's bats (Myotis bechsteinii) DNA Metabarcoding Project. Summer Research Project.

[2] Elbers, A. R. W. and Meisenwinkel, R. (2015) Culicoides (Diptera: Ceratopogonidae) and livestock in the Netherlands: comparing host preference and attack rates on a Shetland pony, a dairy cow, and a sheep. Journal of Vector Ecology. 40:2.

[3] Ayllón, T., Nijhof, A. M., Weiher, W., Bauer, B., Allène, X. and Clausen, PH. (2014) Feeding behaviour of Culicoides spp. (Diptera: Ceratopogonidae) on cattle and sheep in northeast Germany. Parasites and Vectors, 7:34.

ExQ1	Question to:	Question and Answer:
		Therefore, rather than debating the value of different livestock and grazing regimes, we are simply recommending that, given the unknown and potentially adverse response of foraging bats to solar infrastructure, it would reduce the risk of an avoidance response and loss of localised foraging resource currently located between three blocks of ancient woodland (all of which were proposed to be designated as SSSI for Bechstein's bats, and two of which are known to support roosts) to avoid development on the existing cattle grazed pasture and continue the existing management of this area, focussing development on arable habitat that is unlikely to currently be providing a resource. While we welcome the aspiration to include sheep grazing, and acknowledge they may have the potential to provide a foraging resource, the increased value of this is unknown. Most importantly, it should be noted that sheep will be present amongst the solar infrastructure itself. The evidence that bats will avoid areas with solar infrastructure further highlights the likely limited value of sheep grazing within the panels for Bechstein's bats. Alternatively, providing retained cattle grazed fields in parcels as an avoidance measure between fields B6, B7 and B8 would complement the mitigation areas in the south and east of the site, providing landscape-scale mitigation and future resilience. It would mean that all areas of pasture within the site previously identified as being valuable parts of the core sustenance zone of the Bechstein's bat population, as evidenced by radio tracking studies, were retained and protected, whilst still supporting solar infrastructure elsewhere within the site. *Paired detector study* The paired detector study aims to provide further analysis of the data collected during the October 2024 and May 2025 surveys. It is not clear why statistics have been applied to the data from the paired static detector surveys. Insufficient data was collected in the first place for use of paired statistical tests to be possible. There were three pairs surveyed. Splitting the data into night-by-night comparisons, rather than survey period comparisons is artificially inflating sample size and is not valid. Sample size is determined by experimental design and not by analysis methods. Natural England have maintained that there is insufficient data throughout our engagement, and we have emphasised the importance of reaching a practical solution instead of focusing on the limited survey effort. The updated application of statistical tests to this data is heavily flawed and does not add any weight to the findings from the paired sampling or provide any additional insight. The Wilcoxon-Rank Sum Test used is not a paired test and although it is suitable for use on non-parametric data, artificially

ExQ1	Question to:	Question and Answer:
		splitting up the data to inflate the sample size by making a single night a sampling period is not appropriate. It also does not align with the chosen bat survey methodology where static detectors are placed out for multiple nights to allow for variability in activity over a period of time each season. The lack of validity in use of this statistical test is evident by the presentation of multiple p values. We have already acknowledged that hedgerows are preferentially used by the majority bats for commuting through the landscape, which is why the general strategy of retaining and buffering hedgerows is, although untested, accepted by Natural England as suitable mitigation for the majority of species and impacts. The Bat Technical Study recognises that comparison between the use of different open habitats is not possible with the data available, and we agree with that. **oLEMP** *Buffers* The oLEMP has been updated to provide Appendix 5 which clarifies the location of the different buffer widths. This is welcomed. In our written representations [REP1-124] we set out our reasoning for recommending that the buffers for bats were measured from the edge of existing buffer features. We maintain this advice and recognise that the Applicant disagrees with it. Overall, we are disappointed with the Applicant's position on this matter, and we think the mitigation proposals are weaker and less precautionary than they otherwise would have been. It gives less certainty when trying to assess the project's potential impacts, but on balance we recognise the widths are probably sufficient to avoid impacts to commuting routes and connectivity, provided there is an appropriate strategy to monitor this. Further comments on monitoring can be found below. *Mapping* We were also hoping to see the oLEMP updated to include a figure that clarifies the size and location of the grazed grassland fields that are to be lost, retained and gained as a result of the development. This has not been provided, although in subsequent correspondence the applicant's Ecologists have advised that this will be submitted at a subsequent deadline. The oLEMP provides some additional information on what the mitigation strategy for the construction and operational phases of the development will encompass. This additional detail is welcomed. *Monitoring*

ExQ1	Question to:	Question and Answer:
		We recommend that further detail is provided on the proposed monitoring strategy. The oLEMP currently includes a very high level indication of what elements need to be included in the monitoring strategy. We advise that the bat monitoring strategy is a crucial part of the proposed mitigation strategy. It is essential to understanding whether mitigation is effective and whether there needs to be remedial actions to ensure that it is. It is not clear whether the bat mitigation strategy will be a stand-alone document, or if it will form part of the LEMP. We provide further comments on securing the monitoring requirements in our response to Q1.7.24. We welcome the inclusion that the monitoring strategy will be developed in consultation with Natural England. We have concerns as we are currently unsure of the proposed monitoring survey methodology, and there is not an established baseline to monitor against. We are keen to work with the applicant to inform the requirements of the monitoring strategy, including how a robust baseline is developed prior to the potential construction of the project. If designed appropriately it should identify whether mitigation measures are proving effective and, if not, what remedial actions or adaptations should be made. There are potential difficulties with establishing a monitoring baseline as acoustic survey is ineffective for Bechstein's bats. Their calls are not only difficult to distinguish from other *Myotis* species, but they are very quiet and therefore not readily picked up by detection equipment, which can therefore hugely underestimate their activity. As discussed in our representation [AS-038], this bat population has already been subject to invasive radio tracking survey effort, and we would be reluctant to license further radio tracking. There are existing licenses for ongoing radio tracking of this bat population in association with the High Speed 2 project, and so the most effective way to establish a baseline would be through collaborative data sharing. Sharing of radio tracking data for Bechstein's bats would likely be a key aspect of the monitoring strategy. Understanding the details of this potential data sharing agreement and how it will be secured will be necessary to provide reassurance that monitoring impacts on this species from the Rosefield development will be possible. One further concern with regards to monitoring, and as demonstrated by the data collection to date and reported in the Bat Technical Study and Applicant's Response to Relevant Representations, is that monitoring not only needs a firm baseline, it needs to replicate the survey and analysis methodology. As demonstrated by the issue of trying to understand changes in barbastelle usage of

ExQ1	Question to:	Question and Answer:
		the site, the method for data analysis was altered between the 2022/23 static detector surveys and the 2024/25 paired sampling using static detectors rendering comparison between the two pre-development datasets inaccurate, or not possible, as described in the Bat Technical Study (para 4.3.36) and Response to Relevant Representations. We need reassurance that construction and operation phase monitoring will not suffer the same problem and that actual trends in activity will be identifiable. Gathering baseline data should be factored into the timings of the proposed monitoring strategy, which may need to start before year 1 of the operational development. **oCEMP** The oCEMP should be updated following the conclusions of the Bat Technical Study (paragraphs 2.4.1 and 2.4.2) which state that pre-construction assessments may be required. Indirect impacts (i.e. noise during construction) should be addressed, as well as direct impacts (roost loss). In the applicant's response to the Relevant Representations, it is stated that '*In summary: neither construction nor operation are considered to represent a significant source of noise disturbance; however, some pre-construction assessments may be required depending on haul route layout and programme. For the most part, as disturbance is unlikely, even for the low threshold of disturbance for offences which derive from domestic legislation, a licence is unlikely to be required. In the absence of a licence, a Precautionary Working Method Statement will be produced and secured via the Outline CEMP.'* The oCEMP should be updated to reflect this and the possible need for production of a PWMS.
1.7.24	Natural England, Buckinghamshire Council and BBOWT	***Monitoring*** *Do you consider that you should be consulted on, and approve the details of any proposed monitoring of bat activity during the operation of the proposed development, including any monitoring reports and adaptive mitigation measures – justify your answer.*
		In our response to Q1.7.1 we have highlighted the importance of the bat monitoring strategy, the potential complexities of establishing the monitoring and set out why it is a necessary component of the mitigation strategy. We are emphasising the importance of this monitoring strategy given the novel

ExQ1	Question to:	Question and Answer:
		nature of the proposed mitigation, the sensitivity of the bat population and a lack of scientific understanding over the exact impacts of solar developments on bat populations. Without a monitoring program in place, it will be very difficult to justify the conclusions that the novel bat mitigation strategy is going to be effective. The mitigation strategy being linked to a monitoring program means that, should monitoring show that there is a greater adverse impact than expected, mitigation can be revised as part of an iterative management plan, and the effectiveness of the mitigation strategy as a whole can be justified. The applicant has indicated that the monitoring strategy will be developed in consultation with Natural England. We welcome this and agree that this will help to ensure its effectiveness. It is not clear whether the bat mitigation strategy will be a stand-alone document, or if it will form part of the LEMP. Requirement 7 covers the full LEMP, so if the bat mitigation strategy is embedded in the full LEMP, complete with commitments to provide Natural England with monitoring reports, we believe this would provide a secure mechanism to ensure that we can review the ongoing outputs of the monitoring strategy and data collection, ensuring the ongoing effectiveness of the proposed mitigation strategy.