

# Rosefield Solar Farm

Applicant's Response to Action Point 12  
from ISH1

EN010158/APP/8.31  
Revision 01  
Deadline 4  
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Rosefield Energyfarm Limited



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# 1. Introduction

## 1.1. Purpose of the Note

1.1.1. This Note has been prepared on behalf of Rosefield Energyfarm Limited (the Applicant) in order to provide a response to Action Point 12 from Issue Specific Hearing 1 (ISH1) to 'submit a comparative note identifying where the principles in Natural Capital Committee's 'How to Do it: Natural Capital workbook' and the government's guidance on Enabling a Natural Capital Approach' are addressed within the application documents to evidence compliance with NPS EN-1 (2023) paragraph 4.6.16'.

1.1.2. This Note sets out the Applicant's response to the question raised, drawing from information contained in documents already submitted to the Examination.

1.1.3. This Note is structured as follows:

- Background
- Comparison of application documents with guidance and tools referenced in NPS EN-1 paragraph 4.6.16
- Compliance with NPS EN-1 paragraph 4.6.16

## 2. Background

2.1.1. In the **Examining Authority's Written Questions 1 (ExQ1) [PD-010]**, the Examining Authority asked Q1.7.4:

***“National Policy Statement (NPS) EN-1***

*Paragraph 4.6.16 of NPS EN-1 states that applicants should make use of available guidance and tools for measuring natural capital assets and ecosystem services, such as the Natural Capital Committee's 'How to Do it: natural capital workbook', the government's guidance on Enabling a Natural Capital Approach, and other tools that aim to enable wider benefits for people and nature. Explain how you met this requirement.”*

2.1.2. In the **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]** the following response was provided:

*“The Applicant has considered a Natural Capital Approach, alongside good design outcomes that support sustainable development. Good design has been embedded into the Proposed Development through a clear design framework from the outset of the design process. The **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** and **Outline LEMP [EN010158/APP/7.6.3]** set out the approach to the design of the Proposed Development, including how good design has principles have been implemented to take advantage, where possible, of opportunities to deliver wider environmental net gains. This includes enhancements contributing to biodiversity net gain such as:*

- Habitat creation and management;*
- New and improved species rich hedgerows;*
- Enhancement of field margins; and*
- Sowing of land under and between panels with legume rich grassland mix.*

*Alongside the above, enhancements to the community and environment including enhancing access and connectivity to the countryside including the creation of new permissive footpaths and interpretation boards and wayfinding signage.”*

2.1.3. As recorded in the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [REP3-049]**, the Applicant considers that the principles of the Natural Capital Committee and government guidance are met in the **Design Approach Document [EN010158/APP/5.8.3] [CR1-014]** and **Outline Landscape and Ecological Management Plan (Outline LEMP)**

**[EN010158/APP/7.6.5].** The Applicant acknowledges that this is not expressed as clearly as it could be in the response to Q1.7.4, so the remainder of this note sets out what the relevant natural capital guidance indicates should be done and cross-references where those matters are addressed in the documents submitted into the Examination.

### 3. Comparison of DCO Application documents with guidance and tools referenced in NPS EN-1 paragraph 4.6.16

#### 3.1. Introduction

3.1.1. Natural capital is defined in the Enabling a Natural Capital Approach guidance<sup>1</sup> as “*stock of natural assets which provide benefits to people in the form of tangible things which are typically marketed (such as timber, fish stocks, minerals) and less tangible services (such as air purification, recreational settings and flood prevention)*”. The same publication defines ecosystem services as ‘functions of the natural environment, that directly or indirectly provide benefits for people’.

3.1.2. Whilst NPS EN-1 states that applicants ‘should make use of available guidance and tools for measuring natural capital assets and ecosystem services’, the purposes of the main guidance documents referenced do not fully align with their use in support of planning applications. The Natural Capital Committee’s ‘How to do it: a natural capital workbook’<sup>2</sup> indicates that it is “*aimed at anyone who wants to use a natural capital approach in making decisions about the natural environment*”. The Enabling a Natural Capital Approach guidance indicates that it is “*intended for those looking to learn about natural capital and how to apply it*” and that “*You should use ENCA resources if you’re a:*

- *government economist or analyst*
- *public sector organisation interested in understanding the scientific and economic evidence around the natural environment*
- *private practitioner, interested in natural capital evidence, tools and resources used in government*”

3.1.3. However, given the references in NPS EN-1, the following sections provide the cross-references to where the matters identified in the guidance documents are addressed in documents already before the Examination.

#### 3.2. How to do it: a natural capital workbook

3.2.1. The Natural Capital Committee’s ‘How to do it: a natural capital workbook’ presents a methodology for “*improving the environment, based on a more*

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<sup>1</sup> Department for Environment Food and Rural Affairs (2026). Enabling a Natural Capital Approach guidance

<sup>2</sup> Natural Capital Committee (2017). How to do it: a natural capital workbook, version 1

*general framework for investing in natural capital. Natural capital is the 'stock' of resources upon which society depends, and our approach is intended to secure those assets so they can provide a sustainable 'flow' of benefits". It outlines a five-step approach to developing a plan for natural capital. The five steps are:*

1. Setting out the vision
2. Understanding where you are starting from
3. Building the evidence base
4. Identifying and weighing up your options
5. Implementation and evaluation

3.2.2. The five steps are intended to be iterative, and earlier stages may be revisited as the natural capital plan evolves.

#### Setting out the vision

3.2.3. The purpose of this step is to develop general aims for the natural capital plan. It is intended to be the starting point but may change over time. It should include consideration of the outputs of the plan that are particularly important in the specific circumstances of the Proposed Development/ natural capital plan.

3.2.4. Section 4 of the **Design Approach Document [EN010158/APP/5.8.3] [CR1-014]** sets out the vision for the Proposed Development, supported by both strategic and project principles. As explained at paragraph 4.5.2 of the **Design Approach Document [EN010158/APP/5.8.3] [CR1-014]** *"The Project Principles use the Strategic Principles as a framework and are based on an understanding of the Proposed Development's local context, the people it would affect, and the potential benefits and outcomes it can deliver. The Project Principles are used to drive design related decision making throughout the lifecycle of the Proposed Development and are continually tested and improved in response to further baseline survey work, design evolution, environmental assessment and stakeholder feedback to secure the best outcomes at detailed design".* This corresponds to the 'setting out the vision' step of the natural capital plan.

#### Understanding where you are starting from

3.2.5. This step requires understanding of the baseline position of various natural assets, plans and activities that are already in place relating to them, and activities that may have beneficial or adverse effects on them. It requires information relevant to natural capital to be gathered and documented, and may identify assets at risk or drivers of degradation. The workbook states *"At the end of this stage it will be clear what the current state of*

*natural assets are, what is currently planned for them, by whom and over what scales of space and time”.*

- 3.2.6. Section 3 of the **Design Approach Document [EN010158/APP/5.8.3]** **[CR1-014]** sets out the Site Context, drawing on the baseline analysis within **ES Volume 2 [EN010158/APP/6.2]**. Each subsection of section 3 summarises the key factors or issues under each topic that that have influenced the design of the Proposed Development. In addition, section 3 of the **Outline LEMP [EN010158/APP/7.6.5]** draws out key priorities relating to green and blue infrastructure, as identified in relevant guidance documents, including biodiversity action plans, green infrastructure documents, emerging local nature recovery strategies, and landscape character assessments. These two documents combined provide a summary that corresponds to the ‘understanding where you are starting from’ step.

#### Building the evidence base

- 3.2.7. This step requires understanding of the extent and condition of natural capital within the area and the associated benefits, goods and the ecosystem services it provides, and the ways of protecting and improving them. The work in this stage will involve mapping, environmental and ecosystem modelling, economic modelling and integration with demographic and infrastructure plans for the area. The workbook indicates that analyses in this step should be both relevant and plausible, and the outcomes should be a series of potential natural capital plans for the area.
- 3.2.8. The wording of the text relating to this step is focussed on natural capital plans for an area, rather than for a specific development site. However, section 3 of the **Design Approach Document [EN010158/APP/5.8.3]** **[CR1-014]** draws out some of the findings of the mapping, modelling and assessment undertaken as part of the **ES Volume 1 [EN010158/APP/6.1]** and **ES Volume 2 [EN010158/APP/6.2]** and section 5 explains how the design of the Proposed Development has evolved to reflect this information.

#### Identifying and weighing up your options

- 3.2.9. Step 4 of the approach considers the options for action, intervention and investment. This step will involve some kinds of scenario development, modelling and deliberative discussions to agree the nature of the plan. The outcome of this step is a preferred plan, as well as some potential options.
- 3.2.10. Again, whilst the supporting documents prepared for the Proposed Development do not purport to be a natural capital plan or necessarily attract investment beyond that in the Proposed Development itself, the design of the Proposed Development balances the natural capital of a range of factors found within the Site, such as flood alleviation, ecological

value, landscape value and cultural heritage, as demonstrated through the design evolution in section 5 of the **Design Approach Document [EN010158/APP/5.8.3] [CR1-014]** and the consideration of who the Proposed Development can deliver the Project Principles in section 6.

### Implementation and evaluation

- 3.2.11. This stage is about developing a practical, implementable and prioritised action plan. It requires a clear governance structure for overseeing its implementation, as well as a plan to finance the work involved. There should be an effective process for monitoring and evaluation, as well as feeding back to ensure inputs can be varied to achieve the appropriate outcomes.
- 3.2.12. Whilst the Proposed Development, and the mitigation and enhancement measures that form part of it, will be governed and financed by the Applicant, there are a number of plans in place that will require the monitoring of the implemented scheme and ongoing review of outcomes against aspirations. These include, but are not limited to, the following:
- **Outline Construction Environmental Management Plan [EN010158/APP/7.2.5]**
  - **Outline Operational Environmental Management Plan [EN010158/APP/7.3.5]**
  - **Outline Decommissioning Environmental Management Plan [EN010158/APP/7.4.5]**
  - **Outline Construction Traffic Management Plan [EN010158/APP/7.5.4]**
  - **Outline LEMP [EN010158/APP/7.6.5]**

### 3.3. Enabling a Natural Capital Approach

- 3.3.1. On the gov.uk website, Enabling a Natural Capital Approach (ENCA) is described as *“Guidance for policy and decision makers to help them consider the value of a natural capital approach”*. Consequently, it is not directly relevant to the Applicant.
- 3.3.2. It is formed from a series of documents and datasets as follows:
- ENCA guidance – provides guidance on how a natural capital approach can be applied. It indicates that a natural capital approach can provide a strategic basis for how the natural environment can be integrated with and deliver wider socio-economic outcomes, referencing uses in policymaking and public authority decision making.
  - ENCA assessment template – this spreadsheet notes on the front cover that it is *“designed to be completed by policy leads and / or local*

*analysts*". Therefore, it is not considered necessary for the Applicant to have completed this.

- ENCA services databook – which aims is to improve access to a wide, but not exhaustive, range of UK natural capital evidence, categorised by type of environmental service or effect. The databook identifies renewable energy as an environmental service and notes that renewable energy installations can affect amenity and other ecosystem service values.
- ENCA assets databook – which collate a wide range of UK natural capital and environmental valuation data sources, tools and studies.
- ENCA featured tools – which is a summary of selected natural capital or valuation tools developed by government. These include analytical tools and platforms assessing natural capital tools. The Biodiversity Metric is one of these tools and has been applied by the Applicant in relation to the Proposed Development. The outcomes and explanation of this can be found at **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.3]**.
- ENCA case studies – which aims to compile a variety of cases that demonstrate the application of principles of natural capital and ecosystem service valuation in different contexts. None of the examples within the document appear to relate to Solar PV development or renewable energy.

3.3.3. Although these tools, databooks and guidance documents have not been directly applied in relation to the Proposed Development, as part of a proportionate approach to the preparation of the Development Consent Order Application, section 3.2 above demonstrates how natural capital thinking have been considered in relation to the Proposed Development.

#### 3.4. Environmental Benefits from Nature tool

3.4.1. The Environmental Benefits from Nature tool<sup>3</sup> is given as an example in NPS EN-1 of 'other tools that aim to enable wider benefits for people and nature'. NPS En-1 states that it is *"designed to work alongside Biodiversity metric 3.0 to provide developers, planners and other interested parties with a means of enabling wider benefits for people and nature from biodiversity net gain. This tool can be applied to locations in England and Wales, but some datasets may have limited coverage outside of England."* The tool is currently a Beta version and still evolving.

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<sup>3</sup> Natural England (2021. Updated 2024), Principles of the Environmental Benefits from Nature (EBN tool) approach - Beta Version Update v1.1 and Environmental Benefits from Nature (EBN) Tool - Beta Release Update User Guide v1.1

3.4.2. The Environmental Benefits from Nature tool is a “voluntary decision-support tool that has been developed to work alongside Biodiversity Net Gain (BNG) and enable wider benefits for people and nature from habitat change”. The tool “indicates relative change in ecosystem service provision associated with habitat change and is intended to ‘start a conversation’ around wider benefits to people and enable better consideration of losses and gains in ecosystem services from development.”

3.4.3. Figure 2 of the ‘Principles of the Environmental Benefits from Nature (EBN tool) approach’ element of the Environmental Benefits from Nature tool sets out examples of what might be measured by using the tool, as reproduced below.

Figure 2: Expansion of potential elements of ENG (role of EBN tool in red)

			Examples of what might be measured in practice
Environmental net gain	<b>Natural capital stocks:</b> natural assets including biodiversity assets such as terrestrial and aquatic habitats or species diversity which underpin the asset's capacity to deliver ecosystem services.	<b>Biodiversity:</b> habitats and the wildlife species they support.	Wildlife habitats (as measured by BNG) Protected species' habitats / populations
		<b>Ecosystem services:</b> the capacity of habitats, and the wildlife they support, to provide wider ecosystem and cultural services.	Water quality regulation Air quality regulation Places for recreation Carbon storage and sequestration Flood water regulation Wildlife for enjoyment and appreciation
	<b>Natural capital pressures:</b> on national and international natural capital stocks.	direct and indirect pressures.	Energy efficiency Water efficiency Transport efficiency Construction materials and processes Light and noise pollution Recreation impacts on protected sites

3.4.4. Although the full Environmental Benefits from Nature tool has not been applied for the Proposed Development, in part because the approach to good design has been articulated within the **Design Approach Document [EN010158/APP/5.8.3] [CR1-014]** and partly because it was not

considered a proportion approach to undertake in relation to the Proposed Development, the design process has considered the examples from Figure 2 above as relevant. The consideration of the effects of the Proposed Development on the examples can be found in sections 3 to 6 of the **Design Approach Document** [EN010158/APP/5.8.3] [[CR1-014](#)] and the following locations in **ES Volume 2** [EN010158/APP/6.2] as appropriate/relevant to the Proposed Development.

Figure 2 example	Where considered in the ES
Wildlife habitats (as measured by BNG)	<b>ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment</b> [EN010158/APP/6.4.3]
Protected species' habitats/populations	<b>ES Volume 2, Chapter 7: Biodiversity</b> [EN010158/APP/6.2.5]
Water quality regulation	<b>ES Volume 2, Chapter 16: Water</b> [EN010158/APP/6.2.3]
Air quality regulation	<b>ES Volume 2, Chapter 6: Air Quality</b> [EN010158/APP/6.2.2]
Places for recreation	<b>ES Volume 2, Chapter 10: Landscape and Visual</b> [EN010158/APP/6.2.3] <b>ES Volume 2, Chapter 14: Population</b> [EN010158/APP/6.2.4] <b>Outline Rights of Way and Access Strategy</b> [EN010158/APP/7.8.5] [ <a href="#">CR1-026</a> ]
Carbon storage and sequestration	<b>ES Volume 2, Chapter 8: Climate</b> [EN010158/APP/6.2] [ <a href="#">APP-051</a> ]
Flood water regulation	<b>ES Volume 2, Chapter 16: Water</b> [EN010158/APP/6.2.3] <b>ES Volume 4, Appendix 16.1: Flood Risk Assessment</b> [EN010158/APP/6.4.4] [ <a href="#">REP3-028</a> ]
Wildlife for enjoyment and appreciation	<b>ES Volume 2, Chapter 7: Biodiversity</b> [EN010158/APP/6.2.5] <b>ES Volume 2, Chapter 10: Landscape and Visual</b> [EN010158/APP/6.2.3]

	<b>ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.4]</b>
Energy efficiency	<b>ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] <a href="#">[APP-051]</a></b>
Water efficiency	<b>ES Volume 2, Chapter 16: Water [EN010158/APP/6.2.3]</b>
Transport efficiency	<b>ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] <a href="#">[APP-058]</a></b>
Construction materials and processes	<b>ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] <a href="#">[APP-051]</a></b>
Light and noise pollution	Consideration of light pollution is not required for the Proposed Development. <b>ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.3]</b>
Recreation impacts on protected sites	<b>Habitat Regulations Assessment: No Significant Effects Report [EN010158/APP/5.3] <a href="#">[APP-033]</a></b>

## 4. Compliance with NPS EN-1 paragraph 4.6.16

- 4.1.1. Paragraph 4.6.16 of NPS EN-1 states that applicants should make use of available guidance and tools for measuring natural capital assets and ecosystem services, such as the Natural Capital Committee's 'How to Do it: natural capital workbook', the government's guidance on Enabling a Natural Capital Approach, and other tools that aim to enable wider benefits for people and nature. Although these guidance documents were not specifically referenced in the Application documents, the thinking incorporated within them has been applied to the design of the Proposed Development, as set out in Section 3 above. Therefore, the requirements of paragraph 4.6.16 of NPS EN-1, to make use of available guidance and tools, have been met.



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