Date: 30 July 2026
Our ref: 546105
Your ref: EN010158
IP Ref: [redacted]

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FAO: Richard Morgan
Lead Member of the Examining Authority

The Planning Inspectorate
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Rosefieldsolar@planninginspectorate.gov.uk

Dear Richard Morgan,

Application by Rosefield Energyfarm Ltd. For an Order Granting Development Consent for Rosefield Solar Farm
NSIP Reference: EN010158

Natural England's Response for Deadline 5
Examining Authority's submission deadline: 29 July 2026

Natural England (NE) is pleased to provide our Deadline 5 response for the Rosefield Solar Farm Examination within the annexes appended to this letter.

We have provided our comments in the following Annexes:

Annex 1: Comments on any further information received
Annex 2: Comments on Applicant's response to Deadline 3 submissions
Annex 3: Comments on Applicant's response to the Examining Authority's second written questions (ExQ2)

Natural England hopes our Deadline 5 response is helpful. Please note that Natural England have used **no artificial intelligence** tools to aid in the production of this response.

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

Yours sincerely,

[redacted]
Senior Officer
Thames Solent Area Team
Natural England

Annex 1: Natural England's comments on any further information received

Although not yet available to the Examining Authority (ExA) for review, Natural England has received directly a draft copy of an amended mitigation scheme layout, which we believe will be submitted at Deadline 5.

In the amended scheme design, panels have been removed from a number of fields which we have raised in our concerns, and in others the panel allocation has been scaled back in order to reduce potential impacts to Bechstein's bat.

Subject to confirming that the documents submitted at Deadline 5 accurately reflect what we have reviewed, Natural England considers that the proposals should resolve its outstanding concern regarding potential effects on Bechstein's bats through the loss of foraging habitat. Natural England will confirm its final position following our review of the submitted documents, with an updated response and final Statement of Common Ground to be provided at Deadline 6.

We still have concerns regarding:

- Potential impacts to foraging and commuting routes (measurement of buffer zones).
- Potential uncertainty regarding the security of grazing management.

The draft Statement of Common Ground (SoCG) which we have agreed with the Applicant on the 29th July 2026 reflects the above position. Further information regarding these outstanding issues can be found in Annex 2 and 3.

Annex 2: Natural England's Comments on Applicant's response to Deadline 3 submissions

In REP4-082 the Applicant responds to various Deadline 3 submissions. The revised design of the mitigation proposals has, in our view, rendered the majority of points discussed in REP4-082 moot. Where we consider the point will be resolved by the submission of the amended mitigation scheme we have refrained from commenting. We have only responded to points that we consider would remain a live discussion in Annex 2 in order to remove unnecessary discussion or commentary.

Table 3.14 of REP4-082 addresses Natural England's deadline 3 submissions. We provide comments on the sections within our remit where we think advice to the Examining Authority will be useful.

Table Ref	Topic	NE Comment
3.14.4	Fields B9 and B17	In dialogue with the Applicant, Natural England has agreed that field B9 can be included as suitable mitigation for Bechstein's bat. B9 is currently arable and will become grazed pasture. We originally advised that this field, in combination with field B17 would not support the foraging of bats mainly due to its exposed character. While we still advise this is the case for B17, closer examination of the physical characteristics and layout of B9 has led to the change in our advice.
3.14.7	Measurement and quantum of buffer zones	The Applicant's response to this advice is that measuring from a hedgerow centreline is the most reliable. They also state that they are '*willing to review the size of buffers in particular locations as part of the evolving bespoke approach to buffers, and has requested that Natural England make location-specific recommendations.*' In response to this we suggested a project-wide assessment could be carried out which identifies hedgerows with significant numbers of trees so that increased buffers could be targeted here. The Applicant has stated that this is not possible because the majority of hedgerows have trees. All of our previous advice on this topic remains relevant and, in our view, has not been addressed. Failure to adopt this approach risks the buffers not being adequate, or the disturbance/avoidance effect of solar panels potentially reducing the suitability of ecological features which are already present on site. Further information on this measurement methodology is provided in ref 3.14.8 below.
3.14.8	Size of buffer zones	While the Applicant has accepted our points regarding technical and hypothetical distances of echolocation, they have maintained that 15m (from the centreline of existing hedgerows) is appropriate.

Table Ref	Topic	NE Comment
		There is, currently, no way of knowing what is adequate in terms of buffer size, as we don't know over what distance an avoidance effect is elicited. We advise the additional area of land retained additional to the feature of interest is maximised, so that the value of that feature is being maintained not eroded. The total corridor free of solar panels may be 40m when measured from panels one side, but as you reach the far side of the buffer you are in direct proximity to panels the other side. This is the issue, the hedgerows are being 'squeezed' between fields of solar arrays, where currently there are open habitats. So, it makes sense to measure from the edge of the feature being protected so that the entirely of that feature is given the minimum distance from the object being avoided. If you do this, narrower features end up being over all a narrower swathe of habitat, wider features end up comprising a wider swathe of habitat. Measuring from the centreline means that buffers are not additional to the feature and will only ever be the maximum distance panels are from the feature. In effect this will serve to minimise the width of the feature, and every hedgerow across the project area essentially becomes 0m wide, it does not matter if they are currently a narrow or a wide hedgerow, and the widest hedgerows will be subject to more of a 'squeezing' effect than narrow ones. At this stage of the examination, we have accepted that there is a fundamental difference of opinion between Natural England and the Applicant. We hope that we have explained our advice as best we can in order to enable the Examining Authority to make an informed recommendation on the implementation of ecological buffers across the site.
3.14.10	Bat monitoring strategy	We thank the Applicant for updating the monitoring strategy in the oLEMP [REP4-072]. We look forward to continuing to work in collaboration with the Applicant on the development of the monitoring strategy. We note that the document refers to the monitoring strategy being approved by Natural England. We hope to have an agreed updated version which can be submitted at Deadline 6. In particular we will discuss further detail being provided on the: • Development of the baseline and the methodology for establishment (prior to commencement of works) • Agreement between HS2 and Rosefield Solar Farm to ensure compositional analysis of different habitat types and areas and to identify flight lines • Remedial actions for buffers (and further information on potential species-specific needs)

Table Ref	Topic	NE Comment
3.14.14	Environmental assessment methodology	We note the Applicant's response to our three questions. These were aimed at developing conversations which took place at ISH1, and hopefully making the Applicant's assessment methodology clearer to all parties. This issue has also been discussed at various points in the response document which relate to the relevance of specific paragraphs of the Energy National Policy Statement. Now that we expect there will be no net loss of foraging resource to Bechstein's bat we consider this a moot point.

Natural England's Comments on Applicant's response to the Examining Authority's second written questions (ExQ2)

In REP4-082 the Applicant responds to the Examining Authority's second written questions (ExQ2). We provide comments on the sections within our remit where we think advice to the Examining Authority will be useful. Because of the pending revised mitigation plan, there are a number of points which we have avoided responding to, as we believe they will shortly become moot points.

ExQ2	NE Comment
Q2.5.4	**Bechstein's bat – potential loss of foraging habitat** As indicated in Annex 1 of this response, Natural England have reached provisional agreement on fields B3, B6, B7 and B8. In the amended scheme design, panels have been removed from a number of fields which we have raised in our concerns, and in others the panel allocation has been scaled back in order to reduce potential impacts to Bechstein's bat. Subject to confirming that the documents submitted at Deadline 5 accurately reflect what we have reviewed, Natural England considers that the proposals should resolve its outstanding concern regarding potential effects on Bechstein's bats through the loss of foraging habitat.
Q2.5.6	**Bechstein's bat – potential impacts from construction** Natural England are broadly in agreement that the proposed construction compounds are unlikely to cause a negative impact on Bechstein's bat provided the development proposal is carried out in accordance with the measures discussed in the Applicant's response. We recommend that the construction compound is located in field B10, as far away from boundary features as possible, and that a compound in B3 is avoided.
Q2.5.7	**Bechstein's bat – potential loss of foraging habitat** Although the loss of foraging habitat is expected to be avoided in the amended mitigation scheme, we note the response to this question. It is important for us to clarify our position that the potential loss of 'just under 1%' of the core sustenance zone without adequate mitigation would, in our view, potentially equate to significant harm. We thank the Applicant for their ongoing engagement on this topic and for revising the mitigation strategy to avoid this potential harm.
Q2.5.10	**Bechstein's bat – buffer widths** Please refer to Natural England's responses in Annex 2 references **3.14.8** and **3.14.9** in relation to buffer widths.

ExQ2	NE Comment
Q2.5.12, Q2.5.13, Q2.5.14	**Bechstein's bat – effectiveness of proposed mitigation** These three questions all focused on the details of grazing in the proposed mitigation areas. The Applicant and Natural England agree regarding the aims of the mitigation strategy, and we welcome Requirement 7 including us as a consultee on the final details. We also note with interest the discussion at ISH3 between 01:23:20:11 to 01:27:34:23 which centred around grazing agreements. The oLEMP [REP4-072] has been updated to include more information on the intention to secure grazing (paragraph 5.2.3). It also includes the specific statement that 'management of grassland… will be undertaken by a combination of sheep (under panels) and cattle'. We welcome this. The security of this grazing is key to the mitigation strategy. In line with the precautionary principle, grazing on the site should be maintained in order to not lose existing foraging resource. We recommend that Chapter 7 of the oLEMP (Requirements for Detailed LEMP) is updated to include a specific bullet point on the secured grazing agreement. We recognise the Applicant's position is that it is not possible to secure grazing at this early stage. Given that the oLEMP is a control document which Natural England will be formally consulted on at a later date, we can have at least some level of comfort that those grazing agreements will be secured at discharge, and if not, the wider LEMP and mitigation strategy may have to be reconsidered or revised before the requirement can be discharged.