

Rosefield Solar Farm – Deadline 6

CSAG Response to Applicant's Position Paper on Arable Field Margins and Hedgerow Mapping [REP5-094] and CSAG comments on Applicant's latest revised BNG Metric calculation [REP5-056] and BNG Assessment [REP5-058]

A) Arable Field Margins and Hedgerow Mapping

1. Introduction and purpose of this note

- 1.1 Part A of this note responds to the Applicant's 'Position Paper' on Arable Field Margins and BNG Assessment, submitted at Deadline 5 [REP5-094]. The Position Paper arises from an action point taken at Issue Specific Hearing 3 (ISH3) which asked the Applicant to fully set out its reasoning and justification for taking an approach to baseline BNG mapping that treats field margins under 2 m from a hedgerow, and habitat directly beneath a hedgerow, as a continuation of the cropland in the adjoining arable field/s.
- 1.2 The ExA will recall that CSAG have consistently submitted that, by reference (*inter alia*) to the Metric User Guide (p.26) and simple common sense, this is an impermissible approach with potentially significant implications for the reliability of the Applicant's BNG calculation. In particular, CSAG are concerned that this approach has a compounding 'bias upon bias' effect on the BNG calculation: it firstly suppresses the baseline value attached to these strips of land (which will generally extend to a minimum of 5–6 m in width and often be several hundred metres in length, therefore adding up to a significant cumulative area), in complete disregard of their actual baseline status and condition. Secondly it introduces an unjustified additional uplift factor into the calculation by assuming these areas are converted from cropland into grassland in the post-development scenario, when in all cases they already are grassland or similar non-cropland habitat.
- 1.3 Part A of this note sets out why the Applicant's Position Paper does not provide any legitimate answer to these concerns and why the Applicant's approach should continue to be classed as erroneous. Part B considers the Applicant's revised BNG assessment and calculation which purports to still demonstrate a >40% net gain even if the Applicant's approach to arable field margins and hedgerow mapping and scoring is corrected. Part C offers CSAG's overall conclusions on this BNG topic.

2 Illogical rationale and reasoning presented by the Applicant in defence of its approach

- 2.1 The Position Paper defends the Applicant's approach to classification of habitats at narrower field margins and beneath hedgerows as 'cropland' via a misinterpretation of the Statutory Metric User Guide requirement that habitats should be mapped 'to the centre line of the hedgerow'. The premise that habitat mapping should extend to the centreline of any hedgerow is not, and never has been, the substance of the dispute. It is of course the case that no areas of the site should be left as blank or white land – i.e. unmapped, unclassified and unscored. CSAG have never contested otherwise.
- 2.2 The question of concern to CSAG is about how habitats within two metres of, and extending beneath, hedgerows (especially where adjoining active arable land), once mapped, are then classified and scored, not whether they should be mapped or not.

- 2.3 What the Applicant has done (and inexplicably seeks to continue to defend) is classify, map and score such areas and their non-cropland habitats simply as a continuation of the adjacent cropland. The Applicant continues to try and justify this approach in some instances by reference to the 'minimum mapping units' of the UKHab regime, but (presumably in recognition of the fact that the size of these areas logically exceeds any rational application of MMU in all instances) it seems to have retreated from that defence.
- 2.4 CSAG has consistently pointed out that classifying, mapping and scoring land at arable field margins and extending beneath hedgerows as a continuation of the adjacent cropland is not only (and indisputably) wrong as a matter of fact and on the ground, but the approach of classifying and scoring these strips of land as cropland also introduces two forms of error bias into the calculations, both of which unjustifiably elevate the output BNG score.
- 2.5 The first source of bias is that this approach has a suppressing effect on the baseline value of these areas in the BNG calculation (as cropland scores lower than unmanaged field margin grassland for example). The second is that it adds an unjustified additional uplift to the post-development score based on a conversion from low-scoring cropland to higher-scoring grassland, when such habitats are generally already grassland or ruderal habitat, not cropland.
- 2.6 The ExA will recall that in the discussion around this issue at ISH3, CSAG directed (for the second time) the Applicant to page 26 of the Statutory Biodiversity Metric User Guide. Paragraph 1.2.10 of the Applicant's Position Paper does now offer a response to the relevant paragraph, which reads as follows:
- "When accounting for the area adjacent to hedgerows you should:*
- *map the area of habitat to the centre line of the hedgerow;*
 - *not subtract hedgerow footprint or canopy cover from any area habitat;*
 - *not record the loss of area habitat where hedgerows are planted."*
- 2.7 In suggesting that this instruction justifies their approach, the Applicant fails to grasp that this is an instruction to ensure that all habitats on a site are mapped and classified, not an instruction that a nearby lower-scoring habitat type can be 'dragged in' to the hedgerow centreline over the top of (and in disregard of) a higher scoring habitat adjacent to and beneath that hedgerow. The p.26 rule is, in other words, a mapping rule – it is intended to ensure that the mapping of area-based habitats does not leave an unclassified gap in the mapping beneath a hedgerow and it says nothing about what habitat type or distinctiveness the area beneath the hedgerow should be given. The latter point is the central question at issue. Put another way, where to draw the boundary of a habitat polygon and what to call what is inside it are two different questions. CSAG has never contended that the area beneath and adjacent to hedgerows should be left blank, unmapped and out of account. That would be absurd. The issue is (and has always been) that the Applicant has classified and valued that area as cropland in numerous instances, when it palpably is not that habitat.
- 2.8 In responding to that central point, CSAG notes that the Position Paper at Paragraph 1.2.16 seeks to rely on an assertion that at other schemes - West Burton, Peartree and Springwell are cited – field margins and habitat beneath hedgerows may have been mapped and classified in the same way. Citation of an erroneous approach being taken elsewhere is not justification for it being deployed or acceptable here. The examples are in any event presented

without evidence that those schemes' baseline mapping has itself been specifically scrutinised, challenged, tested or accepted as without error by the relevant consenting or examining authorities or relevant stakeholders such as the authors of the BNG scheme at Natural England. In short, shared malpractice across schemes and amongst different Applicants is not a substitute for compliance with the clear direction of the Statutory Metric User Guide (and common ecological sense).

- 2.9 Thus, the high-water mark of the Applicant's argument in defence of its approach is that, because it may have been done elsewhere, it should be allowed to exploit what it perceives as an ambiguity in the Metric 'rules' (as expressed in the User Guide) to support an approach which is patently and indisputably illogical, at odds with the position on the ground, and which introduces errors which unjustifiably bias its BNG assessment towards the positive. CSAG believe this approach should be roundly rejected and also invite the ExA to consider the implications of the Applicant's continuing adherence to it for the veracity of its BNG assessment more generally, as well as its claims of having taken a precautionary approach on other ecological impact assessment matters.

B) The revised BNG assessment [REP5-058](#) and calculation [REP5-056](#) submitted by the Applicant at Deadline 5.

3 Extent of revision and how its true effect on the BNG % figure has been masked

- 3.1 Notwithstanding the Applicant's attempts to continue to defend its illogical approach to field margins and hedgerow mapping and classification, CSAG notes that it has responded to the request of the ExA to quantify the effect of correcting such error by means of a further BNG calculation revision. This is discussed briefly in the Position Paper [\[REP5-094\]](#) at section 1.3, more fully in the revised BNG assessment [\[REP5-058\]](#) (albeit no revised and updated mapping is provided in that document) and with fuller detail presented in the revised Metric calculation submitted at Deadline 5 [\[REP5-056\]](#).

- 3.2 The revised calculation outputs a further drop in area habitat net gain from 49.99% at Deadline 3, to 49.51% at Deadline 4, to 46.63% at Deadline 5 (Table 1 below). The fall between Deadlines 4 and 5 — a further fall of 2.88 percentage points — is due to correcting how the arable field margins and land beneath hedgerows is mapped and classified.

Table 1: change from Deadline 3 and Deadline 4 submissions

	Deadline 3	Deadline 4	Deadline 5
Baseline area habitat units	2078.61	2089.39	2098.33
Post-development area habitat units	3117.61	3123.83	3076.73
Reported area habitat net gain	49.99%	49.51%	46.63%

- 3.3 Even before one takes a deeper dive into whether this can be considered a complete and total correction of the Applicant's BNG errors, it is worth remarking that this is not a trivial adjustment. While the change in % figure between Deadlines 4 and 5 may appear relatively

slight¹ it actually equates to a further contraction in the Applicant's net gain claims of some 56 area habitat units. This is a change equivalent to the ploughing up of some 8.75ha of species-rich grassland. That is a useful illustration of the extent to which the Applicant's flawed approach to BNG – on this single matter alone - was inflating the claimed net gain.

- 3.4 Looking at the overall and longer term change from the February 2026 Metric calculation more closely is also revealing. Table 2 below summarises the changes between the February 2026 (Deadline 3) and July 2026 (Deadline 5) versions of the BNG metric submitted by the Applicant as revisions in response to the errors flagged by CSAG and Buckinghamshire Council.

Table 2 – comparison of change between Metric calculation submitted at Deadline 3 and that submitted at Deadline 5

	Net Change between D3 and D5 Metric Calculation
On-site baseline — area habitats	+19.7 habitat units (but classification/mapping errors remain)
On-site post-intervention — area habitats	-40.9 habitat units
Net area habitat gain	-60.6 habitat units (-3.4%)
Baseline hedgerow	No change — but errors remain
Post-intervention hedgerow	+76.7 hedgerow units (see 3.6 below)
Net hedgerow gain	+76.7 hedgerow units (+12.6 %)

- 3.5 The source of most of the change in the area-based calculation is the hedgerow/field margin error discussed above, but it is notable how the Applicant has sought to combat the effect of this and other corrections by increasing the ambition of its habitat creation proposals by stating that it will create Lowland Meadow in (e.g.) Field D29. In doing so, the Applicant has availed itself of a 'better answer' via departing from its previous (and sensible) position of precaution about whether such uplift was achievable (having regard to matters such as arable legacy and latent high soil fertility). CSAG agrees with Buckinghamshire Council's position, as stated at ISH3, that a raising of the Applicant's habitat creation ambition is to be welcomed, but CSAG notes that the Applicant has committed to it only reactively, to cover off the impact on its BNG calculation of the errors that have now been exposed. CSAG consider that if the Applicant had been fully and seriously committed to such ambitious habitat creation from the outset, it would have collected the data on soil fertility and other parameters to be able to evidence achievability - data that it itself acknowledges is needed in order to lend such ambition any genuine credibility.
- 3.6 As regards the very substantial uplift in hedgerow units since February 2026, CSAG notes that the hedgerow baseline has remained unchanged and that the volume of new creation has also changed negligibly. This reveals that the change driving the improved hedgerow result is in enhancement. Specifically some 50 existing hedges due for enhancement have had their

¹ This is partly due to the sheer size of the order limits and matters of relativity, but the effect of this correction has also been reduced by the applicant raising its habitat creation ambition for certain areas of the site to seek to achieve higher scoring Lowland Meadow habitat. This adds a 9.06 ha enhancement to 'Lowland Meadows' delivering +117.3 units which disguises the magnitude of error introduced by impermissibly counting field margins and beneath hedgerows as enhanced from 'cropland' to 'other neutral grassland'.

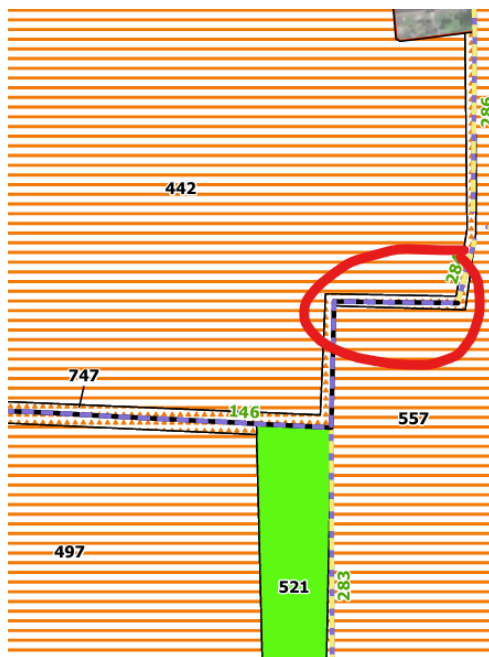
target upgraded, mostly from a modest 'Native hedgerow' specification to a more ambitious 'Native hedgerow with trees' (i.e. tree planting has been added to the enhancement prescription, raising distinctiveness).

- 3.7 On this matter, similar comments and concerns apply. CSAG recalls and agrees with the practical deliverability concerns raised by Bucks Council at ISH3 in respect of planting into established hedgerows for the purposes of securing this numerical enhancement. It raises the open question as to whether all hedgerow enhancement upgrades to 'Native hedgerow with trees' are securely committed to and deliverable.

4 Ongoing errors and their implications for the reliability of the claim of >40% net gain in habitat units being deliverable.

- 4.1 CSAG notes that, not for the first time in the Examination, the Applicant claims its latest revised BNG calculation is now correct and can be relied upon. CSAG remains unconvinced that this is the case. In the interests of brevity, just two further examples of ongoing and residual error are provided below.

- 4.2 **EXAMPLE 1:** The left-hand panel below is an extract from the baseline habitat mapping presented in [\[REP4-058\]](#) (Figure 2, page 3 of 21 – pdf page 55). The right is Google Earth imagery. The c.0.1ha scrubby woodland feature circled in red on the Google Earth image (which would likely be classed as woodland under BNG due to component tree height and the width of the feature at around c.10m broad) does not appear on the Applicant's habitat mapping (only a continuation of the adjacent hedgerow is shown). This is, therefore, yet another baseline feature that has not been recognised, mapped, classified or otherwise factored in to the BNG calculation. If it was missed entirely, the question arises as to whether it was properly surveyed at all.



- 4.3 **EXAMPLE 2:** The left-hand image below is a Google Earth image of Field B10 from 2020 and the right-hand image is an equivalent from 2025. This shows that around 1.3ha of grassland formerly within this field was ploughed up between 2020 and 2025. The bottom image is a screengrab from the Applicant's habitat mapping showing that the entirety of this field is mapped as cropland in the baseline state – i.e. consistent with the 2025 position. This sequence engages the statutory 'degradation' rules that apply to BNG calculations².
- 4.4 The rule runs that where land-use changes occur on land on or after 30 January 2020 and those changes have the effect of reducing the baseline biodiversity value, the pre-existing value and condition must be used in the Metric calculation — i.e. degradation since 2020 cannot be used to depress the baseline (as that could reward deliberate modification or degradation of habitats to influence BNG scores). The images below provide a clear instance of where the Applicant has disregarded the degradation rules.



5 Conclusions

- 5.1 While CSAG acknowledges the corrections and improvements that have been made by the Applicant to its BNG assessment and Metric calculation since Deadline 3, it remains unconvinced that either are yet sufficiently accurate to support the Applicant's case that its 40% net gain commitment via Requirement 7 is realistically achievable.
- 5.2 As there now appears to be insufficient time left in the examination to fully and finally bottom out all the Applicant's BNG errors, the ExA is asked to take into account the following when

² Town and Country Planning Act 1990, Schedule 7A, paragraph 6 — inserted by Schedule 14 of the Environment Act 2021.



considering this aspect of the Applicant's case and its implications for the scheme's compliance with relevant NPS policy:

- The Applicant's position on BNG has changed significantly through the Examination. In general, there has been continued and incremental retraction from the position it presented at the point of submission of the DCO application, in response to justified challenges to the accuracy of its baseline mapping and classification.
- The magnitude of those corrections is higher than indicated in the Applicants latest BNG assessments and calculations as the Applicant has reactively attempted to mitigate the effect of its concessions by increasing its future habitat creation ambition (and post-development score) in order to ameliorate or cancel out their effect on the BNG numbers. Such changes are a departure from the precautionary approach it initially took, which was based on a sensible reading of the challenges to high-quality habitat delivery on this site due to matters such as high soil fertility. Put bluntly, the Applicant has readily abandoned such principles in order to keep its BNG score above the threshold where it needs to be.
- Even on a remote analysis using aerial photography (*in lieu* of full site access), there remain substantive errors which further impact the accuracy of the Applicant's BNG calculation and undermine the confidence that can be had in the scheme's ability to achieve the targets set for it, in particular by Requirement 7.
- The ExA can therefore place little or no reliance or weight on the Applicant's BNG claims and calculations. CSAG does not contend that, applying the BNG methodology, the scheme is incapable of avoiding net loss, but due to the Applicant's erroneous approach, its reluctance to accept and correct error in a timely manner through the Examination, and its readiness to reach for questionably attainable habitat creation targets in order to backfill the holes created by its own errors, the actual measure of any positive biodiversity change using the Metric cannot be reliably determined.

Bioscan UK Ltd on behalf of CSAG

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