

Date: 12 August 2026  
Our ref: 546105  
Your ref: EN010158  
IP Ref: [REDACTED]



FAO: Richard Morgan  
Lead Member of the Examining Authority

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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 6  
Examining Authority's submission deadline: 12 August 2026**

Natural England (NE) is pleased to provide our Deadline 6 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: Closing summary statement  
Annex 2: Any further information requested by ExA

Natural England hopes our Deadline 6 response is helpful. Please note that Natural England have used no artificial intelligence tools to aid in the production of this response.

*A note on the SoCG*

Please note that we expect a completed Statement of Common Ground (SoCG) to be submitted by the applicant at deadline 6. Natural England has signed this on the understanding and agreement that draft text we have reviewed will be added to the oLEMP. Although we might not ordinarily provide this completed SoCG prior to the finalised information being available to all parties, we have completed the SoCG in good faith, and in the hope it will assist you in bringing the examination to a timely close. This text should include:

- Updates to paragraph 6.2.8 of the oLEMP to include more detail about monitoring
- Updates to Table 6.1 of the oLEMP to include more specificity around the objectives of the monitoring strategy
- Updates to paragraph 7.1.1 of the oLEMP to include more detail on grazing

Further detail on these changes can be found in Annex 1.

For further advice on this consultation please contact the case officer [REDACTED]  
[REDACTED] [\[REDACTED\]@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk) and copy to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely,

[REDACTED]  
Senior Officer  
Thames Solent Area Team  
Natural England

## Annex 1: Closing summary statement

Natural England have made clear our concerns about this development's potential impacts to the nationally important and rare Bernwood Bechstein's bat population. We first raised this issue in our EIA Scoping response dated 8<sup>th</sup> December 2023.

The development is proposed in an extremely ecologically sensitive landscape. The Bernwood Bechstein's bat population is known to be at the edge of the species range, geographically isolated and genetically unique, making it of particular significance and sensitive to habitat fragmentation and loss.

This information is evidenced in Natural England's work on the proposed Bernwood SSSI renotification project.

The research and understanding of how solar development impacts bat populations is still in its relative infancy, but there are numerous studies showing negative impacts; Tinsley et al (2023)<sup>1</sup>, Szabadi et al (2023)<sup>2</sup>, Barré et al. (2024)<sup>3</sup>, Baudouin et al. (2026)<sup>4</sup>, and another just published June 1<sup>st</sup>: Tavernier et al. (2026)<sup>5</sup>. While Szoldatits et al. (2025)<sup>6</sup> found that 'ecovoltaic' sites in north American landscapes may benefit some bat species, the vast majority of research on the topic highlights some level of conflict between solar farms and bats.

Natural England has worked extensively with our expert mammal specialists to provide detailed advice to the Applicant and the Examining Authority on how to better understand these impacts and how avoidance, mitigation and compensation should be designed and secured.

### *Impacts to foraging habitats*

Although primarily a woodland specialist, Bechstein's bats will also forage in areas of open space where invertebrate prey is abundant and located in close proximity to roosts. They are a species particularly sensitive to disturbance and may avoid foraging in areas subject to lighting, noise or significant anthropogenic change.

Our key recommendation was that all direct impacts to foraging habitats of the bats were avoided and excluded from development, with habitat connectivity also maintained. In the final design presented at deadline 5, this complete avoidance has not quite been achieved, but the development does demonstrate that there will be overall no net loss of foraging habitat. This outcome is best highlighted in Appendix 6 of the outline Landscape and Ecological Management Plan [REP5-075] which demonstrates while some grassland habitats will be lost, they are re-provided elsewhere.

As the application progressed, we have focused our advice on the northwestern part of the development proposal, in the area around Shrub's Wood where there would have been

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<sup>1</sup> Tinsley, E., Froidevaux, J. S. P., Zsebok, S., Szabadi, K. L. & Jones, G. (2023) Renewable energies and biodiversity: impact of ground-mounted solar photovoltaic sites on bat activity. *Journal of Applied Ecology* 60: 1752-1762.

<sup>2</sup> Szabadi, K. L., Kurali, A., Rahman, N. A. A., Froidevaux, J. S. P., Tinsley, E., Jones, G., Gorfal, T., Estok, P. & Zsebok, S. (2023) The use by solar farms in mosaic landscapes: implications for conservation. *Global Ecology and Conservation* e02481

<sup>3</sup> Barré, K. et al. (2024) Insectivorous bats alter their flight and feeding behaviour at ground-mounted solar farms. *Journal of Applied Ecology* vol61 issue 2 pp. 328-339

<sup>4</sup> <sup>4</sup> Baudouin, A., Hette-Tronquart, N., Brun, C., Gay, N., Chartendrault, V., Kerbiriou C. (2026). Balancing renewable energy and biodiversity: Assessing solar farm effects on bat activity. *Biological Conservation* 314.

<sup>5</sup> Tavernier, C., Nuijten, R., Buij, R. & van Langevelde, F. (2026) Solar fields in farmlands, their impact on bat presence and activity. *PLOS ONE*, 21(6), e0335581.

<sup>6</sup> Szoldatits, K., Walston, L., Hartmann, H., Fox, L., Stanger, M.E., Steele, S.E., Hogstrom, I. & Macknick, J. (2025) Bat activity at ecovoltaic solar energy developments in the Midwestern United States. *Global Ecology and Conservation*, 63, e03864.

significant loss of foraging habitat, in the form of cattle-grazed pasture, and potential further impacts to connectivity. We welcome the design of the mitigation proposals in the central and eastern parts of the scheme, which should provide retention of foraging habitat.

There is very minimal survey data available specifically for this north-western part of the site, as access was limited and only acoustic survey methods were possible. However, available radio tracking data assimilated for the SSSI renotification identified it as important for open-space foraging, and scientific literature suggests that grazing livestock, especially cattle, support an invertebrate biomass that bats are able to exploit as a foraging resource. This includes, for example, biting midges which peak around dusk when bats are emerging. Loss or alteration of this management practice may therefore alter this foraging resource and reduce invertebrate prey available at key times and in close proximity to roosts.

Continuation of grazing livestock, including cattle, within the site is therefore key to reducing changes to how the site supports bats during construction and operation of the proposed development. We welcome the increased retention of cattle-grazed pasture and the strengthened commitment to ensuring that cattle grazing will be implemented within the wider site mitigation areas.

As part of the Applicant's deadline 6 submissions, we anticipate that they will have updated the oLEMP to include a specific bullet point in section 7.1.1 which specifies the need for the updated LEMP to include details on the grazing regime and stocking densities across the grazed field parcels. We would like to emphasise that any changes or deviation from the planned cattle grazing of the mitigation parcels would necessitate a re-assessment of the mitigation strategy.

#### *Impacts to connectivity*

Most UK bat species will utilise landscape features such as hedgerows, tree lines, watercourses and woodland edges to navigate through the landscape, making use of the cover they provide to help to evade predation. They may forage along the same features, or commute quickly to/from favoured, more profitable foraging areas. Uninterrupted, undisturbed dark corridors are therefore essential for bats to permeate the wider landscape and access foraging and roosting resources, as well as providing a foraging resource in themselves.

Given the mounting scientific evidence that there may be an avoidance effect of solar panels on bats, creation of adequate undeveloped swathes of habitat through the landscape will be important to preventing bats avoiding currently used commuting routes and foraging areas.

Retention of existing features of importance (such as woodlands and hedgerows) protected by a buffer of undeveloped land is a standard mitigation measure for development. However, it is unfortunately not evidence-led. It is also not known over what distance the avoidance effect may occur, but we agree that it stands to reason that the larger the distance between the feature of interest and the object eliciting the avoidance effect, the less likely it is to occur.

Early on in engagement with the applicant's ecologists we agreed to the use of habitat retention and buffering to try to mitigate potential adverse effects of solar panels on bats (all species, not just Bechstein's), and that in areas of greatest value for commuting bats these would be wider, or could be a minimum width in areas evidenced as being of less value. We thought we had reached agreement on this matter, however, this was on a presumption that the buffer would be wholly additional to the feature being protected. Only later in the consultation process did it become apparent that the feature, i.e. hedgerow, was to be wholly incorporated within its buffer, therefore the 'buffer' is actually reduced to a standard width swathe of habitat provision, a width that is not nuanced by the feature to which it is supposed to be protecting.

At the closure of examination, we have not been able to resolve this matter with the Applicant.

Although it may be simpler in terms of digitally mapping and measuring such swathes to take a central measurement, there is no ecological rationale for this methodology, and indeed in ecological terms it may do the very opposite of what it is intended to do. For example, by reducing the widest and most ecologically important linear features to their minimum provision. Furthermore, bats will utilise the edge of the feature for cover when commuting in less dark or adverse weather conditions, and therefore it is often the edge of the hedgerow that is of specific importance and not only the bulk of the hedgerow itself.

It stands to reason therefore, that either the edge of the feature should be used as the measurement point for the edge of the buffer, or to allow for ease of mapping/measuring, continue to measure from a central point, but with all buffers increased by the width of the widest hedgerow.

While we agree that the buffers included in the mitigation strategy are likely to reduce the risk of adverse effect, it may still be that the avoidance effect is greater than the scale of the habitat swathes (i.e. hedgerows and their buffers) designed to retain connectivity and access to foraging resources. This is why monitoring of the effects of the development, and if necessary, implementation of targeted remedial measures will be paramount.

#### *Monitoring Strategy*

Being able to detect and understand changes in how bat utilise the site as a result of the impacts of development, and, if necessary, adjusting the provision of habitat and its management, or removal of factors that are having an adverse effect, are key to being able to minimise or reverse any adverse impacts from development. A robust and scientifically rigorous monitoring strategy is therefore essential.

The monitoring programme must be designed in a way which means there can be a direct assessment of the effectiveness of the mitigation measures both in terms of; preventing an avoidance response from bats, and at least maintaining existing commuting and foraging resources.

The applicant has agreed that the monitoring strategy will be developed in collaboration with Natural England in the latest Statement of Common Ground. Additionally, the oLEMP [REP5-075] (paragraph 6.2.9) states that Natural England will be consulted and have to approve this strategy. This is secured via requirement 7 of the DCO. If the monitoring strategy and grazing management plan has not been secured at the time of discharging requirement 7, the relevant planning authorities may not be able to discharge it.

## **Annex 2: Any further information requested by ExA**

The rule 8(3) letter received 3<sup>rd</sup> August 2026 includes the following question for Natural England: *“the ExA notes NE’s position set out in the latest draft statement of common ground [REP5-016] between it and the applicant, that it is unable to provide of a letter of no impediment for impacts to the Great Crested Newt because at this stage of the proposed development planned licensable mitigation approaches are not fully developed. NE is requested to respond to the applicant’s contention [REP5-016] that notwithstanding this, Great Crested Newt licensing should not be a constraint to the Secretary of State consenting the application because NatureSpaces’ in principle district licensing offer to the applicant provides a feasible alternative.”*

Natural England notes the Applicant's position that NatureSpace's in-principle District Licensing offer provides a potential licence mechanism through which impacts to Great Crested Newt (GCN) may be addressed.

Our position, as set out in the Statement of Common Ground, remains that it is not currently able to provide a Letter of No Impediment (LONI) in respect of GCN impacts. This is because, at the current stage of project development, the proposed licensable mitigation approach and supporting information are not sufficiently developed to enable NE to reach a conclusion on whether a licence would ultimately be granted.

However, Natural England's position should not be interpreted as a conclusion that GCN licensing is infeasible or incapable of being secured. Rather, it reflects the level of detail currently available and the fact that any future licensing decision would need to be considered on the basis of a completed licence application and the information available at that time.

We acknowledge that district licensing may provide a potentially feasible licensing pathway for the Proposed Development. However, given that such a district licensing approach would be delivered by NatureSpace rather than NE, assurances that all relevant licensing requirements and tests could be satisfied if progressed via such a district licensing scheme would be better placed coming from either the Applicants themselves in consultation with NatureSpace, or, from NatureSpace directly.