

[by email only]

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08th January 2024

To Whom it may concern,

RE: 23/03875/APP Rookery Farm BESS

The Berks, Bucks and Oxon Wildlife Trust (BBOWT) is a local nature conservation charity, and as such our comments relate specifically to the protection and enhancement of the natural environment and wildlife. We comment on as many relevant issues as our resources allow, and the absence of a comment on an issue should not be taken as our approval.

The proposed Battery Energy Storage System (BESS) is located in one of the best remaining ecologically important landscapes in southern England. It is nationally important for rare habitats and species, such as wildflower meadows, hairstreak butterflies, bats and ancient woodland. BBOWT is greatly concerned about the number of substantial infrastructure projects in the immediate vicinity to Rookery Farm BESS and the cumulative impacts of these on habitats and wildlife.

BBOWT is aware of three proposed solar farms in the immediate area:

1. **Rosefield Solar Farm** is a Nationally Significant Infrastructure Project (NSIP) which is in the early stages of planning and has recently undertaken a Scoping Opinion request **23/03613/DCO**. The early designs for the development indicate that the solar farm would have a connection to the National Grid at East Claydon Substation, with potential areas for 'solar development, project substation and/o battery storage' located immediately to the south of the substation, and to the west of the proposed Rookery Farm BESS. The remainder of the development is to the south-west of the proposed BESS and has the potential for adverse effects on sites designated for nature conservation as well as priority habitat and protected and priority species. BBOWT strongly opposes this solar farm.
2. **Land at Wings Farm** with an application for a solar farm with an export capacity of up to 49.9MW. The recent Screening Opinion is referenced **23/01939/SO**. The location of this development is less than 1 km to the south of the proposed Rookery Farm BESS.



3. **Tuckey farm.** An approved application, **19/00983/APP**, for a solar farm of up to 25 MW located less than 1km to the north of the proposed Rookery Farm BESS.

In addition to these proposed solar farms, East West Rail (EWR) runs just a couple of kilometres to the north of the proposed development, and intersects with High Speed Two (HS2) around 7 km to the west. The construction of these rail lines, HS2 in particular, have put huge scars across and fragmented this landscape, and caused untold harm on wildlife and habitats.

The cumulative effects of these rail and solar projects with another infrastructure project of a Battery Energy Storage System, as proposed at Rookery Farm, would be colossal. Whilst each of the infrastructure projects are independent planning applications, BBOWT considers that for this and future applications in the vicinity, Buckinghamshire Council should assess the applications in light of the other proposals and consider the widespread impact they will have on the landscape and the wildlife it supports.

BBOWTs comments on the proposals

Fencing

We note that paragraph 7.14 of the applicant's Planning Design and Access Statement states: *"The compound is protected with a 2.5 m high steel mesh fence."*

This is likely to present a significant impact on ecological connectivity. We consider that mammal gates must be included at regular intervals around the development.

Lighting

Chapter 3: Ecology and Biodiversity of the Environmental Statement states in paragraph 6.2.1 that:

"A Landscape and Ecology Management Plan (LEMP) will be developed for the proposed development... The LEMP will provide as a minimum... iv. Detail on how the lighting during the operational phase will be designed and managed to minimise impacts across the application site and surrounding area. This will be based on the Bat Conservation Trust guidance on artificial lighting (BCT, 2023)."

This suggests during the operation of the site that lighting will be used. The LEMP (Sightline Landscape, November 2023) does not provide details on lighting as has been suggested it would. Introducing lighting into this area could potentially impact upon a number of species such as bats. It is BBOWTs opinion that the site should not be permanently lit and a sensitive lighting strategy must be devised for where lighting is necessary (e.g. motion sensor security lights). There will need to be a Condition to this end if permission is ultimately granted.

Yours sincerely

Sarah Hearn

Sarah Hearn
Biodiversity and Planning Manager