

Tween Bridge Solar Farm

5.9 Potential Main Issue for Examination

**Planning Act 2008
Infrastructure Planning (Applications: Prescribed Forms
and Procedure) Regulations 2009**

APFP Regulation 5(2)(q)

Document Reference: 5.9

August 2025

Revision 1

POTENTIAL MAIN ISSUES FOR EXAMINATION

Table of Contents:

1	Introduction.....	2
1.1.	Purpose of this document.....	2
1.2.	Potential Main Issues for Examination.....	3

List of Tables:

List of Tables:.....	1
Table 2-1 – Ecological Potential Main Issues.....	4
Table 2-2 – Heritage /Archaeology Potential Main Issues.....	8
Table 2-3 – Agricultural Land Potential Main Issues	12
Table 2-4 – National Grid Substation / Scheme Point of Connection.....	15
Table 2-5 – LVIA Potential Main Issues.....	17
Table 2-6 – Noise.....	19
Table 2-7 – Air Quality and Greenhouse Gases.....	20
Table 2-8 – Flooding and Drainage.....	21

1 Introduction

1.1. Purpose of this document

- 1.1.1. This Potential Main Issues for Examination (PMIE) document has been prepared by RWE Renewable UK Solar and Storage Ltd (the Applicant) to accompany an application for a Development Consent Order (DCO) (DCO Application) for Tween Bridge Solar Farm (the Scheme) made to the Secretary of State for Energy Security and Net Zero pursuant to the Planning Act 2008.
- 1.1.2. This document has been prepared and submitted in compliance with the Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus (September 2024) and Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('the APFP Regulations') which states: "The application must be accompanied by... any other documents considered necessary to support the application".
- 1.1.3. The purpose of this document is to provide the Examining Authority (ExA) with a summary of the main residual issues with key stakeholders remaining at the time of the DCO Application submission. This document has been prepared alongside relevant stakeholders and this document has been shared with the relevant stakeholders and the contents agreed, where possible, prior to the submission of the DCO Application. This document has been presented in the format provided by the Planning Inspectorate. The issues set out in chapter 3 do not constitute a definitive list of matters likely to be raised during the DCO Examination and does not preclude stakeholders from raising further concerns during the planning process.
- 1.1.4. It is anticipated that a number of the issues outlined in this document may be resolved between the submission of the DCO Application and Examination, including once stakeholders have had an opportunity to review the DCO Application and through the evolution of application documents, including the negotiation of 'protective provisions', where necessary. It is the Applicant's intention to continue to work with stakeholders throughout the DCO Examination to resolve issues wherever possible.
- 1.1.5. The Applicant intends to agree Statements of Common Ground (SoCG) with relevant stakeholders to be set out in the Rule 6 and Rule 8 letters issued by the ExA following acceptance of the DCO Application. These SoCGs will remain live

through the course of the Examination as the Applicant continues to engage on any outstanding matters, and a final position will be submitted prior to the close of Examination.

1.2. Potential Main Issues for Examination

- 1.2.1. Tables 2 to 6 below set out an overview of the potential main issues with the relevant stakeholders that have not been resolved prior to submission of the DCO Application.
- 1.2.2. The tables provide an overview of the concerns held by each stakeholder, where this concern is addressed in the DCO Application, and the Applicant's position on the likelihood of the issue being resolved prior to, or during, the Examination.
- 1.2.3. The tables include a Red/Amber/Green rating to highlight the likelihood of each issue being resolved. The following consideration has been applied to each colour:
 - Red – fundamental disagreements which are unlikely to be resolved during Examination.
 - Amber – issues which are in discussion and may be resolved during Examination.
 - Green – issues that are likely to be resolved prior to or during Examination.

POTENTIAL MAIN ISSUES FOR EXAMINATION

Table 2-1 – Ecological Potential Main Issues

Ref	Area of Disagreement	Summary of Concern	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
ECO – 01	<p>Natural England</p> <p>Lincolnshire County Council</p> <p>The absence of data to inform the Habitat Regulations Assessment (HRA) at the stage of the statutory consultation.</p>	<p>The concern is the Site's location and context in proximity to a number of ecological designations and the absence of complete survey data and appropriate assessment of the Scheme's potential impact. This includes the potential likely significant effects on the European Sites within 10km: Thorne and Hatfield Moors Special Protection Area (SPA). Other ecological designations include Thorne Moor Special Area of Conservation (SAC), Hatfield Moor SAC, Humber</p>	<p>ES Chapter 7 Ecology and Nature [Document Reference 6.2.7].</p> <p>Outline Ecological Construction Management Plan [Document Reference 7.5]</p> <p>Outline Landscape Ecological Management Plan [Document Reference 7.6]</p> <p>Shadow Habitat Regulations Assessment</p>		<p>Medium</p> <p>Applicant's position:</p> <p>A Shadow HRA [Document Reference 5.3] has been provided with the DCO application, which includes detail on non-breeding bird mitigation land to ensure opportunities remain for the functionally linked SPA and Ramsar bird species.</p> <p>This detail is also available in ES Chapter 7 [Document Reference 6.2.7] and the Outline Landscape Ecological Management Plan [Document Reference 7.6].</p> <p>Specific measures are proposed during construction, as detailed the Outline Ecological Construction Management Plan [Document Reference 7.5], and</p>

POTENTIAL MAIN ISSUES FOR EXAMINATION

		<p>Estuary SPA, and Humber Estuary Ramsar.</p> <p>The potential impacts include:</p> <p>Loss of functionally linked land to Humber Estuary SPA/Ramsar and</p> <p>Thorne and Hatfield Moors SPA; and negative effects during construction, such as from damage, lighting, noise, air quality, and water quality.</p>	[Document Reference 5.3]		<p>include protection measures during construction to prevent damage, as well as impacts from air quality and water quality and quantity. During operational phase, water quality will improve around the Order Limits due to a cessation in intensive arable farming and agrichemical inputs, benefiting the hydrologically linked habitats and the flora and fauna they support, including located in the designated sites. Based on all the measures, it is considered that there will be no impact to any European designated site, either alone or in combination with any other plan or project.</p> <p>The Applicant consulted on parts of the HRA. The final application documents reflect the consultation input which will be available review prior to the examination.</p>
ECO-02	City of Doncaster Council	Additional information is required to assess potential impacts on these SSSIs	ES Chapter 7 Ecology and Nature Conservation		<p>High</p> <p>Applicant's position:</p>

POTENTIAL MAIN ISSUES FOR EXAMINATION

	<p>Natural England</p> <p>Thorne & Hatfield Moors Conservation Forum</p> <p>Potential impacts to Hatfield Moor SSSI, Hatfield Chase Ditches SSSI, Humber Estuary SSSI, and Thorne and Hatfield Moors SSSI</p>		<p>[Document Reference 6.2.7].</p> <p>Outline Ecological Construction Management Plan [Document Reference 7.5]</p> <p>Outline Landscape Ecological Management Plan [Document Reference 7.6]</p> <p>Shadow Habitat Regulations Assessment [Document Reference 5.3]</p>		<p>Additional detail is provided in ES Ecology and Nature Conservation Chapter 7 [Document Reference 6.2.7] as well as Outline Ecological Construction Management Plan [Document Reference 7.5], Outline Landscape Ecological Management Plan [Document Reference 7.6], and Shadow Habitat Regulations Assessment [Document Reference 5.3] demonstrating that there will be no overall impact.</p>
ECO - 03	<p>Thorne & Hatfield Moors Conservation Forum</p>	<p>Year 2 (2023-24) Non-breeding bird data required in support of the ecological assessment, including the HRA.</p>	<p>ES Technical Appendix 7.2 [Document Reference 6.3.7.2]</p>		<p>High</p> <p>Applicant's response:</p> <p>The Year 2 non-breeding bird data has been included and bat surveys are being undertaken in 2025. Not all bat survey</p>

POTENTIAL MAIN ISSUES FOR EXAMINATION

	North Lincolnshire Council Absence Survey Data for non-breeding birds, and bat survey data.	Bat survey data			data will be available at the time of submission as surveys will continue into September 2025. However, the results available have been reviewed and included in the submission. In addition, the measures that are proposed, including new native habitat creation, ensure that there will be no overall significant effect and there will be an enhancement for bats.
--	---	-----------------	--	--	---

POTENTIAL MAIN ISSUES FOR EXAMINATION

Table 2-2 – Heritage /Archaeology Potential Main Issues

Ref	Area of Disagreement	Summary of Concern	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
HER -01	<p>North Lincolnshire Archaeology Officer</p> <p>Archaeological site survey methodology / approach – Fieldwalking</p>	<p>North Lincolnshire Archaeology Officer is concerned that Order Limits need to be field walked pre-submission.</p> <p>The project team's stance is that fieldwalking the whole order limits was disproportionate to advise appropriately on archaeological conditions.</p>	<p>ES Chapter 8 Cultural Heritage and Archaeology Technical Appendix 8.6 [Document Reference 6.3.8.6]</p>		<p>Medium</p> <p>Applicant's Response:</p> <p>The issue remains under discussion and it is envisaged that the Archaeology Mitigation Strategy will be consulted on in detail with the Officer at the pre-examination stage and it is anticipated agreement is likely to be reached during examination.</p>

POTENTIAL MAIN ISSUES FOR EXAMINATION

HER-02	<p>City of Doncaster Council</p> <p>Archaeological site survey methodology / approach – Fieldwalking</p>	<p>South Yorkshire Archaeology Service (SYAS) Officer (on behalf of Doncaster) was concerned that fieldwalking was required pre-submission.</p> <p>The project team's stance is that fieldwalking the whole order limits was disproportionate to advise appropriately on archaeological conditions.</p>	<p>ES Chapter 8 Cultural Heritage and Archaeology Technical Appendix 8.5 [Document Reference 6.3.8.5] and Technical Appendix 8.6 [Document Reference 6.3.8.6]</p>	<p>Medium</p> <p>Applicant's Response:</p> <p>The Applicant agreed to consider the feasibility of targeted fieldwalking on the basis of areas of potential identified from the baseline and geoarchaeological assessments, which is being undertaken across the draft Order Limits.</p> <p>Even if the Applicant did consider it appropriate to undergo field walking at this stage, following a review of the site it was found that fieldwalking was not possible in 2024 or 2025 given ground conditions and the very limited extent of ploughing, which was exclusively in areas of limited archaeological potential.</p> <p>Consultation with the Officer on 17th April 2025 agreed an interim approach of shovel test-pitting to be undertaken pre-submission in the absence of</p>
--------	---	---	--	--

POTENTIAL MAIN ISSUES FOR EXAMINATION

					<p>fieldwalking due to the lack of ploughed land.</p> <p>Fieldwalking will be revisited post-consent.</p> <p>The issue remains under discussion and it is envisaged that the Archaeology Mitigation Strategy will be consulted on in detail with the Officer pre-examination and that agreement is likely to be reached prior to examination.</p>
HER-03	<p>North Lincolnshire Archaeology Officer</p> <p>Archaeological site survey methodology / approach – Trial trenching and mitigation</p>	<p>North Lincolnshire Archaeology Officer and SYAS Officer (on behalf of City of Doncaster Council) raised concerns that trenching could not take place prior to fieldwalking and geophysical survey were complete over</p>	<p>ES Chapter 8 Cultural Heritage and Archaeology Technical Appendix 8.4 [Document Reference 6.3.8.4] and Technical Appendix 8.6 [Document Reference 6.3.8.6]</p>		<p>Low</p> <p>Applicant's Response:</p> <p>The Applicant has engaged with the Archaeology Officer to explain why the adopted methodology is proportionate and acceptable. The issue remains under discussion, and it is envisaged that the Archaeology Mitigation Strategy will be consulted on in detail with the Officer pre-examination whilst it is expected that progress will be</p>

POTENTIAL MAIN ISSUES FOR EXAMINATION

		the whole of the Order Limits.			made both prior to, and during, examination there remains a probability that areas of disagreement will remain unresolved.
--	--	--------------------------------	--	--	--

POTENTIAL MAIN ISSUES FOR EXAMINATION

Table 2-3 – Agricultural Land Potential Main Issues

Ref	Area of Disagreement	Summary of Concern	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
AGR-01	<p>Natural England</p> <p>City of Doncaster Council</p> <p>North Lincolnshire Council</p> <p>Use of Best & Most Versatile (BMV) agricultural land to accommodate the proposed development.</p>	<p>The proposed development is located on land that comprising BMV agricultural land.</p> <p>At the time of statutory consultation Agricultural Land Classification (ALC) surveys were not all completed and there were some data gaps.</p> <p>Natural England have stated in their consultation response that there is a risk of soil damage, ALC degradation and</p>	<p>ES Chapter 15 Agricultural Circumstances [Document Reference 6.2.15]</p> <p>ES Technical Appendices 15.1 Agricultural Land Classification [Document Reference 6.3.15.1]</p> <p>ES Technical Appendices 15.2 Farm Reports [Document Reference 6.3.15.2]</p> <p>Planning Statement</p>		<p>Medium</p> <p>Applicant's Response:</p> <p>The remaining ALC surveys have now been completed and the data is provided in the ES Chapter 15 Agricultural Circumstances [Document Reference 6.2.15] and ES Figure 15.1 [Document Reference 6.4.15.1]. This is likely to resolve the comments regarding the absence of a complete baseline survey.</p> <p>The disagreement on whether the scheme should be located on BMV is likely to remain during the examination. The Applicant's position is that this should be given</p>

POTENTIAL MAIN ISSUES FOR EXAMINATION

		<p>long term or permanent loss of BMV. Natural England also</p> <p>City of Doncaster Council identifies Local Plan Policy 60 which refers specifically to the protection of BMV and the need to conserve and minimise the loss of Doncaster's extensive area of high-quality arable farmland, noting that agriculture is the main land use within Doncaster, making up nearly two thirds of the total area.</p> <p>North Lincs have stated that the loss of BMV land will need to</p>	<p>[Document Reference 5.5]</p>		<p>appropriate weight in the planning balance.</p>
--	--	---	--	--	--

POTENTIAL MAIN ISSUES FOR EXAMINATION

		be robustly considered in the planning balance.			
--	--	---	--	--	--

POTENTIAL MAIN ISSUES FOR EXAMINATION

Table 2-4 – National Grid Substation / Scheme Point of Connection

Ref	Area of Disagreement	Summary of Concern	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
NGET -01	No identified 'disagreement' between the Applicant and National Grid. The potential case is the location of the Scheme's point of connection (POC) is not confirmed.	The Applicant has a grid connection agreement with National Grid to export renewable energy from the Scheme to a new National Grid 400KV substation. However, National Grid have not confirmed the exact location of their proposed new substation.	Cover Letter [Document Reference 1.2] Planning Statement [Document Reference 5.5] ES Chapter 2 Scheme Description [Document Reference 6.2]		<p>High</p> <p>Applicant's Response:</p> <p>At the time of the first Grid Connection Offer in 2022, the point of connection (POC) was assumed to be available on or close to the Site adjacent to the exiting 400KV overhead line. During 2024, the Applicant was informed by National Grid that the POC location would be moved from its anticipated location due to other projects applying for grid capacity at the same area. More details on this are provided in the Design Approach Document [Document Reference 5.6].</p> <p>The Applicant anticipates that NGET will confirm the location of the POC during the examination. However, at</p>

POTENTIAL MAIN ISSUES FOR EXAMINATION

					<p>the point of submission the location of the National Grid substation remains unknown. The Scheme therefore does not propose a cable connection from the main solar PV and associated infrastructure to the POC, beyond the boundary of the Order Limits.</p> <p>The Applicant has outlined why it is not necessary for this Scheme to include proposals to connect the generating station to the point of connection, and the alternative ways the cable connecting the Scheme to the National Grid substation can be consenting outside of the DCO application. This is explained Covering Letter [Document Reference 1.2] and Planning Statement [Document Reference 5.5].</p>
--	--	--	--	--	---

POTENTIAL MAIN ISSUES FOR EXAMINATION

Table 2-5 – LVIA Potential Main Issues

Ref	Area of Disagreement	Summary of Concern	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
LVIA -01	<p>City of Doncaster Council</p> <p>North Lincolnshire Council</p> <p>No identified 'disagreement'. Acknowledgement that there has been no feedback from the host authorities regarding the LVIA methodology.</p>	<p>City of Doncaster Council and North Lincolnshire Council advised from the non-statutory consultation stage that neither authority have an officer with the appropriate experience and capabilities to review and comment on the landscape matters of the scheme. This means the host authorities have not confirmed agreed with the selected viewpoints, methodology and</p>	<p>ES Chapter 6 Landscape and Visual [Document References 6.2.6]</p> <p>ES Chapter 6 Landscape and Visual Technical Appendix 6.1 [Document Reference 6.3.6.1] and Technical Appendix 6.8 [Document Reference 6.3.6.8]</p>		<p>Medium</p> <p>Applicant's Response:</p> <p>The LVIA and supporting assessments have been completed by an experience Landscape Architect and in accordance with the relevant assessment guidance. The Applicant is engaging with the host authorities to appoint a suitably qualified professional to act on their behalf. It is envisaged that this will be agreed during the pre-examination stage. This remain a potential issue for examination should the host authorities advise at the written representations stage or through the Local Impact Report that they do not agree with the methodology and/or</p>

POTENTIAL MAIN ISSUES FOR EXAMINATION

		assessment of the Scheme.			conclusions of the Landscape and Visual assessments.
--	--	---------------------------	--	--	--

POTENTIAL MAIN ISSUES FOR EXAMINATION

Table 2-6 – Noise

Ref	Area of Disagreement	Summary of Concern	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
NOISE -01	Natural England Noise disturbance on Thorne & Hatfield Moor SPA during construction and Operation	Potential noise impacts on birds, specifically Nightjar	ES Chapter 13 Noise and Vibration [Document reference 6.2.13] Shadow Habitat Regulations Assessment [Document Reference 7.10]		High Applicant's Response: Natural England highlighted the issue but there is very little formal guidance on the impact on birds. Notwithstanding this, the Applicant has predicted very low operational noise levels at the Thorne & Hatfield Moor and any construction works can be adapted if required.

POTENTIAL MAIN ISSUES FOR EXAMINATION

Table 2-7 – Air Quality and Greenhouse Gases

Ref	Area of Disagreement	Summary of Concern	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
AQGG-01	<p>Natural England</p> <p>Non-road Mobile Machinery and generators within 200 m of designated habitats (Thorne Moor SAC, Thorne and Hatfield Moors SPA and Thorne, Crowle and Goole Moors SSSI and Hatfield Chase Ditches SSSI)</p>	Potential noise impacts on birds, specifically Nightjar	<p>ES Chapter 13 Noise and Vibration [Document Reference 6.2.13]</p> <p>Shadow Habitat Regulations Assessment [Document Reference 7.10]</p>		<p>High</p> <p>Applicant's Response:</p> <p>Natural England highlighted the issue but there is very little formal guidance on the impact on birds. Notwithstanding this, the Applicant has predicted very low operational noise levels at the Thorne & Hatfield Moor and any construction works can be adapted/controlled if required.</p>

POTENTIAL MAIN ISSUES FOR EXAMINATION

Table 2-8 – Flooding and Drainage

Ref	Area of Disagreement	Summary of Concern	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
F&D -01	<p>Doncaster East Internal Drainage Board</p> <p>Isle of Axholme and North Nottinghamshire Water Level Management Board</p> <p>IDB requirement to cross all watercourses by means of HDD.</p>	<p>The IDB also advised that <i>“the Board will require all watercourses to be crossed by means of HDD at a depth no less than 2 metres PLUS the cable safety distance below the hard bed level of all watercourses (to ODN if EA or IDB maintained). This will apply to the primary cable route and any interconnecting</i></p>	<p>ES Chapter 10 Water Resources [Document Reference 6.10]</p> <p>ES Technical Appendix 10.1 Flood Risk Assessment [Document Reference 6.3.10.1].</p>		<p>Medium</p> <p>Applicant’s Response:</p> <p>ES Figure 2.4 Indicative HDD Crossing Plan [Document Reference 6.4.2.4]” highlights where HDD is proposed within the Order Limits. Directional drilling is proposed for Main Rivers, Internal Drainage Board Watercourses and the Canal. Where HDD is not used, the proposed culverting methodology will ensure flood risk is not negatively impacted. The proposed culverting does not pose any engineering concerns.</p>

POTENTIAL MAIN ISSUES FOR EXAMINATION

		<p><i>cables between array sites."</i></p> <p>The Applicant does not propose HDD for all water crossings.</p>			
F&D -02	<p>Environment Agency</p> <p>North Lincolnshire Council</p> <p>Raising infrastructure above the Isle of Axholme Critical Flood Level of 4.1mAOD.</p>	<p>Comments from the EA and LLFA about the 4.1mAOD critical flood level have been ongoing through the various project stages.</p> <p>The EA have advised that "<i>The FRA does not propose to raise critical equipment above the CFL. In terms of meeting the requirement of the National Policy Statements in relation to the development</i></p>	<p>ES Chapter 10 Water Resources [Document Reference 6.10]</p> <p>ES Technical Appendix 10.1 Flood Risk Assessment [Document Reference 6.3.10.1]</p>		<p>Medium</p> <p>Applicant's Response:</p> <p>Raising infrastructure within the Order Limits to a level of 4.1mAOD (the CFL inclusive of 300mm of freeboard) would comprise raising of over 4m above ground level at the lowest point of the infrastructure, with parts of the Order Limits situated below 0mAOD in elevation. This would take solar PV modules for example notably above the maximum of 3.6mAOD at the top edge as defined in ES Figure 2.6 Indicative Layouts and Cross Section Plans [Document Reference 6.4.2.6]. Raising infrastructure above the CFL would have significant structural and visual impact</p>

POTENTIAL MAIN ISSUES FOR EXAMINATION

		<i>remaining operational during times of flood it would be for the Inspector to determine whether this would be acceptable."</i>			<p>implications. The significant raising already proposed is considered appropriately conservative.</p> <p>Ground levels in Flood Zone 3b are not proposed to be altered. ES Figure 2.6 Indicative Layouts and Cross Section Plans [Document Reference 6.4.2.6] includes typical sections of the proposed inverter buildings, battery containers, customer switchgear containers and spares containers and details that all of these will be raised above the ground (minimum 100mm above the 1 in 1,000 year flood level) using small footings which are sat on 300mm of permeable gravel. The impact of the proposed inverter buildings, battery containers, customer switchgear containers and spares containers on floodplain storage will therefore be negligible, with water able to pass freely underneath.</p> <p>In accordance with standard practice, an Outline Surface Water Drainage</p>
--	--	--	--	--	--

POTENTIAL MAIN ISSUES FOR EXAMINATION

					<p>Strategy has been provided at this stage. A fully detailed drainage design will be prepared prior to construction. The proposed Outline Surface Water Drainage Strategy is included in the appended FRA (ES Appendix 10.1 Flood Risk Assessment [Document Reference 6.3.10.1]). Full details of the proposed drainage will be confirmed during detailed design post-consent of the DCO application. During this stage, an assessment on the suitability of above ground SuDS will be carried out when full details of the proposals are available. More detailed network calculations would also be prepared during detailed design.</p>
--	--	--	--	--	--