



# Doncaster Council

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**Date:** 26 June 2025

Dear Sir/Madam

## **Proposed Tween Bridge Solar Farm Development Consent Order**

### **Adequacy of Consultation Milestone Report**

Thank you for the opportunity to provide comments on the Adequacy of Consultation Milestone Report (AoCM) (dated June 2025), a copy of which was provided to City of Doncaster Council (CDC), by email on 10 June 2025.

CDC understands that the Planning Inspectorate will seek the formal views from the Council about the adequacy of consultation, under section 55(4)(b) of the Planning Act 2008 and that our representations at that time must be limited to whether the Applicant has complied with its duties under sections 42, 47 and 48 of the Planning Act, and not broader matters such as the merits of the application itself.

Nevertheless, at this point in the process, CDC understands that published guidance<sup>1</sup> makes clear that full and meaningful consultation and engagement, before the submission of an application is intended to result in a smoother pre-application experience for all stakeholders, lead to a well-prepared application including necessary and relevant detailed information and reduce the risk of changes to the application being proposed at too late a stage in the NSIP process. Disappointingly, at this juncture, CDC has serious concerns about the lack of any meaningful engagement having taken place to shape the project which is understood to be submitted shortly for Examination.

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<sup>1</sup> [Nationally Significant Infrastructure Projects : Advice on working with public bodies in the infrastructure planning process - GOV.UK](http://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-on-working-with-public-bodies-in-the-infrastructure-planning-process)

Published guidance<sup>2</sup> also sets out that to inform the AoCM, the Applicant will make a written submission to the Inspectorate which establishes the consultation undertaken to date, confirms the approaches set out in the Statement of Community Consultation, and summarises the consultation responses and the way in which they are shaping the application. Importantly, it should include the views and any relevant supporting material from local authorities if available.

CDC submitted its formal response to the Statutory Consultation on 08 May 2025 and at the Summary and Recommendations set out as follows:

*“I confirm that this letter forms City of Doncaster Council’s consultation in response to your statutory consultation and notification pursuant to Section 42 of the Planning Act 2008. Taking into consideration the evidence of the PEIR and the contents of this letter, and the relative lack of engagement that has taken place to date, the Council strongly encourages the Applicant to positively engage with it on all relevant technical matters as the Environmental Impact Assessment progresses and before Environmental Statement stage submission.*

*Lastly, the Council would like to put on record that as one of the Host Authorities for this project, we are invited to participate in the DCO process and believe that our local knowledge and expertise can add significant value to positively shaping the project. This is not a statutory duty placed on us, but nevertheless, the Council wishes to take an active role in participating in the process. The Council does however expect to fully recover the costs of this involvement and in this respect has repeatedly asked the Applicant to recommence meaningful discussions regarding a Planning Performance Agreement. Full costs recovery is expected by the Council at every stage of this process, including during the discharge of Requirements should the application be consented. It is hoped that the Applicant recognises the value the Council can add to the process and engages accordingly going forward.”*

Since then, the only substantive correspondence it has had in respect of this project (other than in respect of a Planning Performance Agreement) has been limited to the following:

- Email from Ion Acoustics Ltd dated 09 June 2025 seeking to agree the location of noise sensitive receptors to be used in the noise and vibration assessment (see **Appendix 1**).
- Email from the Applicant’s Agent regarding the Adequacy of Consultation Milestone Report itself dated 10 June 2025, advising of the 01 July 2025 deadline to respond, which was subsequently revised to 27 June 2025.
- Email from RSK LDE dated 19 June 2025 15:49 requesting records of any groundwater or surface water abstractions. CDC has since confirmed that this amounts to information under the Environmental Information Regulations (see **Appendix 2**).

As such, there have been no meaningful attempts to engage with CDC on any of the substantive issues arising from the project as set out in the Statutory Consultation Response, or even any approaches to discuss what was contained within that response. CDC therefore

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<sup>2</sup> [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](#)

does not consider that the Applicant can positively explain the way in they are addressing those matters in shaping the application. It is noted that no attempt to do so has been made in the current AoCM report before CDC for comment.

With the above in mind, CDC has significant concerns that consultation with the Council has been minimal, effectively only ensuring the minimum is achieved in terms of legal compliance. This is incredibly disappointing and appears to be dictated by the Applicant's determination to meet a self-imposed and accelerated deadline for submission for Examination rather than as a tangible opportunity to positively shape the project.

We would be grateful for your confirmation that you have submitted our views as part of your report in due course.

Yours faithfully

Roy Sykes  
Head of Planning  
Directorate of Place  
City of Doncaster Council

## **Appendix 1:**

From: Mark Harrison [REDACTED] <[\[REDACTED\]@ionacoustics.co.uk](mailto:[REDACTED]@ionacoustics.co.uk)>  
Sent: 09 June 2025 13:35  
To: Nuisance Team <[NuisanceT@doncaster.gov.uk](mailto:NuisanceT@doncaster.gov.uk)>  
Subject: Tween Bridge Solar Farm Consultation - Noise Sensitive Receptor Locations

To Whom it May Concern,

I am currently undertaking the noise and vibration assessment for the proposed Tween Bridge Solar Farm and was hoping to engage with the Environmental Health team at the Council to agree the location of noise sensitive receptors used in the assessments.

The scheme is (to the best of my knowledge) fixed and we are currently preparing our reports for submission. Given the size of the scheme, I am not proposing to assess all receptors, though have tried to identify locations representative of the closest affected properties etc. I have divided scheme into residential and non-residential receptors, with the non-residential receptors including ecological receptors, heritage receptors and Public Rights of Way (PRoW).

The two categories of receptors are presented in the tables below:

### **Residential Receptors**

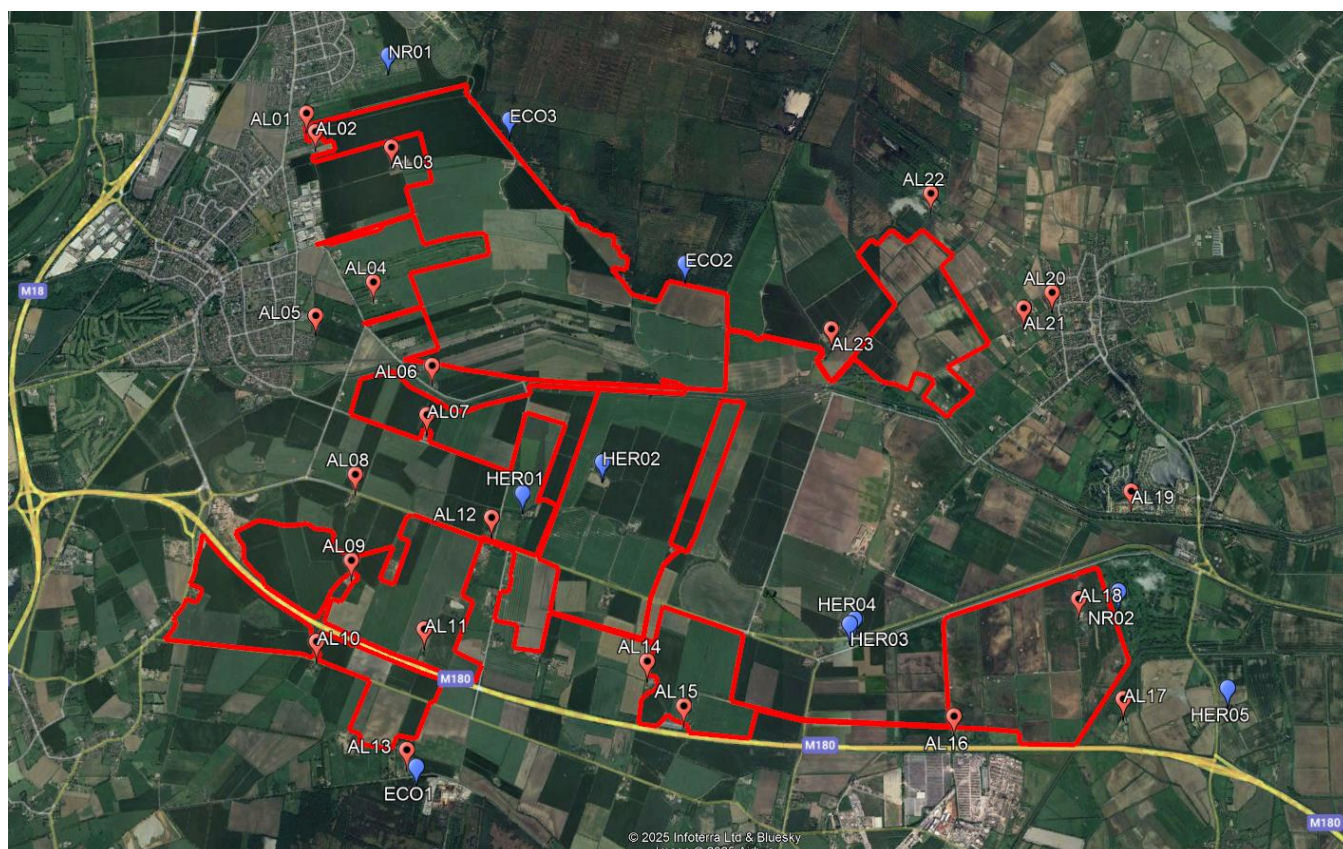
Location Reference	Description	Easting	Northing
AL01	Wilkinson Avenue	469583	414814
AL02	Broadgate Farm	469720	414513
AL03	Dairy Farm Cottage	470431	414345
AL04	Sandmoor Farm	470340	412999
AL05	St Georges Road	469784	412657
AL06	Orchard Farm	470903	412209
AL07	Clay Bank Farm	470919	411675
AL08	Steam House	470263	411135
AL09	Tolstem House	470210	410262
AL10	Stouppers Gate Farm	469937	409547
AL11	Crow Tree Farm	470950	409667
AL12	Green Bank	471584	410757
AL13	Coldstream Cottage	470832	408576
AL14	Plains House Farm	473046	409405
AL15	Goodcop Cottage	473415	409001
AL16	Woodcarr Farm	475956	408980
AL17	Common Farm	477525	409147
AL18	Belton Grange	477120	410043
AL19	7 Lakes Holiday Park	477617	411089
AL20	Windsor Road	476923	412984
AL21	Marsh Road	476632	412864
AL22	Rose Cottage	475733	413959

AL23	Moor Edge Cottage	474721	412553
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### Non-Residential Receptors

Location Reference	Description	Easting	Northing
Eco1	Thorne and Hatfield Moor SPA	470991	408480
Eco2		473549	413218
Eco3		471526	414677
Her01	Grove House	471841	410933
Her02	Sandhill Farm	472595	411281
Her03	Dirtness Pumping Station	474981	409795
Her04	Dirtness Cottage	475011	409822
Her05	Mosswood Cottage	478543	409244
NR01	Pig Hill Allotments	470256	415253
NR02	Golf Course	477516	410144
PRoW	The Isle Greenway		
PRoW	Peatlands Way Long Distance Walk		

I have included a rough screen grab of the assessment locations below. Please note, the red line boundary is not accurate but has been included to indicate the broad site area.



A couple of points to note:

- 1) The ecological receptors are representative points of Thorne & Hatfield Moor at closest approach to the proposed solar farm.
- 2) In consultation with the project Ecologist, they highlighted the sensitivity of the Humber Estuary area however, given the separation distance of at least 3km, noise and vibration during both the construction and operational phases is unlikely to result in any adverse impacts.
- 3) The identified PRowWs are only the named routes identified. There are a number of other smaller paths which are included in the assessments, but I can't find names for them.

The residential receptors would be assessed in accordance with BS4142 with appropriate correction factors for any tonal elements to the noise sources. Background sound levels have already been established in the area and indicate that noise levels, particularly towards the motorway, are quite high during both the day and night-time periods.

There is limited guidance on the potential noise impact on birds at the ecological receptors. Some information is available in the Institute of Estuarine & Coastal Studies (IECS) mitigation toolkit, though its not particularly detailed. If you know of any relevant guidance, I would be happy to include this in my assessment.

NR01, NR02 (Non-residential receptors) and the PRowWs are to be assessed against the noise criteria for outdoor living areas detailed in the WHO guidelines for community noise. This would quantify the potential for annoyance and should also achieve the criteria for 'Outdoors in parkland and conservation areas', by keeping the 'ratio of intruding noise to natural background sound' low. It is likely that noise levels during the construction phase will be higher however, these works would be temporary in nature and would not result in long term loss of amenity.



The heritage receptors are listed buildings and would be assessed in accordance with BS4142, assuming they are used as dwellings.

If know of any other receptors for inclusion in my assessment, please let me know ASAP. If you are happy with the above, please could you confirm by return email. Alternatively, I can be reached on the mobile number below if you wish to discuss anything further.

Many thanks and kind regards,

Mark Harrison  
Principal Consultant

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## **Appendix 2:**

**From:** Alison Cadge [REDACTED]@rsk.co.uk>  
**Sent:** 19 June 2025 15:49  
**To:** Pollution Control <Pollution.Control@doncaster.gov.uk>  
**Cc:** Keefe, Emma <[REDACTED]@doncaster.gov.uk>; Sykes, Roy  
[REDACTED]@doncaster.gov.uk>  
**Subject:** Abstraction records query - Tween Bridge

Dear Sir / Madam,

I am trying to collate records of any groundwater or surface water abstractions for the attached site which sits between Thorne and Crowle, northeast of Doncaster. It is roughly centred at grid reference 473779E, 409500N, and postcode DN8 5SH. The site is the subject of an application for a solar development (Tween Bridge Solar Farm).

Please could you provide any records you hold of abstractions within this site, or within a 2km buffer of the red line boundary? I would be interested to know the location, use and source of any abstractions.

If you don't hold these records, would you be able to point me in the direction of someone who might be able to help please? I am also contacting North Lincolnshire Council as the search area extends into their jurisdiction.

I can provide the red line boundary as a shapefile if that assists at all.

Many thanks for your assistance,

Alison

**Alison Cadge**  
Principal Hydrologist



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