



The Planning Inspectorate
National Infrastructure Directorate
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Your ref.	EN010148
Contact	Paul Hunt
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22/08/2025

Dear Sir/Madam,

EN010148 – Application by RWE Renewables UK Solar and Storage Limited for an order granting development consent for the Tween Bridge Solar Farm project

The Applicant would like to thank the Planning Inspectorate for its advice under section 51 of the Planning Act 2008, dated 15 August 2025. The Applicant would also like to thank the Inspectorate for its time to discuss the advice and the Applicant's proposed approach to addressing the main observations raised in the advice on 21st August 2025.

As discussed with the Inspectorate during the discussion on 21st August, the section 51 advice sets out a number of helpful observations. The Applicant will have regard to all of the points in preparing a new application for development consent ('DCO application') for the Tween Bridge Solar Farm project ('the Scheme').

This letter provides an overview of how the Applicant proposes to address the Inspectorate's main observations via the new DCO application, which directly and substantively responds to and addresses the advice in respect of the Scheme. The DCO application will be submitted to the Planning Inspectorate by 26th August 2025.

Summary of the Applicant's approach to addressing the main observations from the Inspectorate's section 51 advice

The Inspectorate's advice is clear that the main observations regarding the Applicant's withdrawn application related to the adequacy of the Environmental Impact Assessment (EIA) and, consequentially, the submitted Environmental Statement (ES).

The main observations raised by the Inspectorate in its advice were two-fold:

- Firstly, the absence of survey coverage of the area of land defined as ‘Land Parcel F’, within which a 400kV underground cable and an area of bird mitigation, both associated development in the Scheme, were proposed to be located, and the subsequent omission of Parcel F from relevant figures and appendices.
- Secondly, the absence of survey coverage of areas added to ‘Land Parcels A – E’ through the pre-application process.

To address these matters, the DCO application will:

- Exclude all of the land within Land Parcel F, with the exception of an area of approximately 19 hectares of bird mitigation which will be incorporated into Land Parcel E. The Applicant has carried out relevant surveys for the retained bird mitigation area and will present the data and related assessments as part of the Environmental Statement.
- Include survey data for the areas of land added to Land Parcels A-E during the pre-application process. The relevant surveys have been ongoing through the summer and, as such, the Applicant is now able to provide this additional data as part of the Environmental Statement for the DCO application.

The Applicant has provided further detail on how each of the Inspectorate’s observations will be addressed by the DCO application below, taking each of the points from the Inspectorate’s section 51 advice in turn.

Absence of survey coverage of areas added to the solar development (Parcels A – E) and NGET substation area (Parcel F), and subsequent omission of Parcel F from relevant figures and appendices

We address the Inspectorate’s comments on Parcel F before turning to Parcels A-E.

Survey coverage of Parcel F

In the withdrawn DCO application, Parcel F comprised an area within which a 400kV underground cable was proposed to be located (“the 400kV export connection cable”), based on the Applicant’s assumption that National Grid (NGET) would also locate a new 400kV substation somewhere within Parcel F (albeit this would be consented and delivered separately by NGET) (“the NGET 400kV substation”). Parcel F also included a mitigation area for ground nesting birds.

As noted, the Applicant now proposes to remove the majority of Parcel F from the Scheme. Part of the bird mitigation area formerly included in Parcel F will be incorporated into Parcel E. A plan showing the Order Limits for the DCO application, compared to the Order Limits associated with the withdrawn Application, is included as Attachment A of this letter.

The removal of Parcel F will address the Inspectorate's comments regarding the absence of survey coverage, as Parcel F will (with the exception of an area for bird mitigation to be brought within Parcel E) no longer form part of the Order Limits and the Applicant will therefore not be seeking development consent for the 400kV export cable within that area. The Applicant considers that this approach should satisfy the Inspectorate that its concerns about the absence of survey coverage in respect of Parcel F in respect of the withdrawn application will not arise in relation to the DCO application.

All relevant surveys have been completed for the bird mitigation area retained in Parcel E. Given the nature of activities proposed within the bird mitigation area – being a continuation of its arable use with no infrastructure proposed – the Applicant considers the relevant surveys to comprise breeding and non-breeding bird surveys. Both of these surveys have been completed for the bird mitigation area and will be included and subject to assessment within the Environmental Statement in support of the DCO application.

The removal of Parcel F in turn means that the Applicant will not be seeking development consent pursuant to the DCO application for that part of the 400kV export connection cable within Parcel F that would have been required to connect the RWE on-site 400kV substation (part of the Scheme) to the new NGET 400kV substation. The DCO will include powers for the provision of 400kV cables within the Order Limits as part of Work No. 2, however the 400kV export connection cable from the Order Limits to the new NGET 400kV substation will be consented separately.

Given that the location of the NGET 400kV substation has not been confirmed by NGET, it is not currently possible for the route of the 400kV export connection cable to be defined. Accordingly, the Applicant considers that to remove this element of its previous proposals from the DCO application would be the most appropriate consenting strategy. It will ensure that the development comprised in the Nationally Significant Infrastructure Project can be consented via the Planning Act 2008, and the associated cables can be consented outwith the DCO, expeditiously, and in line with the Government's Clean Power 2030 strategy.

Consenting approach to the 400kV export connection cable

The Applicant will provide additional information on the consenting approach for the 400kV export connection cable separately as part of the DCO application, but it would highlight at this stage that this is an approach which is recognised and provided for within Section 4.11 of the Overarching National Policy Statement (NPS) for Energy (EN-1).

In particular while paragraph 4.11.7 of NPS EN-1 encourages applications for new generating stations and related infrastructure to be contained in a single application or in separate applications submitted in tandem where possible, paragraph 4.11.8 acknowledges that there will be instances where this is not possible. In such instances, paragraph 4.11.8 states that applicants should explain the reasons for the separate applications, including information on the elements to be consented separately to the extent they are available. Importantly, footnote 160 to paragraph 4.11.8 acknowledges that different levels of information may be available at different times and as such, applicants should take a proportionate approach to what information should be included. The Applicant will clearly explain the approach to the 400kV export connection cable as part of the DCO application and will provide justification for the approach taken in line with paragraph 4.11.9 of EN-1, noting that as discussed with the Inspectorate at the meeting on 21st August, very limited information is currently available upon which to make an assessment.

The Applicant notes that paragraphs 2.7.2-2.7.4 of the NPS for Electricity Networks Infrastructure (EN-5) also recognise this approach to consenting.

The Applicant has an existing grid connection agreement for the Scheme with the National Electricity Systems Operator and there is no obvious reasons why a separate consent application for the 400kV export connection cable would not be secured. For completeness, the Applicant will also ensure, in accordance with regulation 6(1)(a) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 that the application includes “a statement of who will be responsible for designing and building the connection to the electricity grid”.

The Inspectorate will be aware that the merits of consenting part of the 400kV connection cable separately is a question about the deliverability of the Scheme which would (as the Applicant expects) be subject to detailed consideration at Examination, and is not a matter relevant to deciding whether or not the DCO application should be accepted. The Applicant would also note that the approach of consenting a grid connection separately from the generating station element of a scheme is not uncommon and there are a number of made DCOs that have taken this approach, including Triton Knoll Offshore Wind Farm, Brecha Forest West Wind Farm and Hinkley Point C Nuclear Power Station.

Omission of Parcel F from figures and appendices

As the Applicant's approach will be to exclude Parcel F from the DCO application, it will no longer be required to show the area on figures and appendices. However, the Applicant has reviewed all figures and appendices and is ensuring those submitted with the DCO application show the correct Order Limits.

Survey coverage of areas added to Parcels A-E through the pre-application process

Summer surveys have been ongoing since the submission of the withdrawn DCO application and the Applicant is therefore in a position to provide the full set of survey data for Parcels A-E as part of the DCO application.

The following table identifies the additional survey data now available and which will where relevant be included in the DCO application.

Survey	Applicant's Response
Bats	<p>Bat surveys across Parcels A-E were instructed for the 2025 survey season. The surveys have commenced and are continuing to be progressed up until October 2025 in line with best practice guidance. Due to survey window constraints, the Autumn data is not available to accompany the DCO application, however the Spring and Summer data will be included as part of the Environmental Statement.</p> <p>The remaining data will be submitted as soon as it is ready, which is expected to be November 2025 and therefore before the anticipated Examination period. This will allow interested parties the opportunity to make any representations on the additional survey information provided, as is common and ensures procedural fairness will be observed for all parties.</p> <p>Notwithstanding the absence of the Autumn data, the Applicant notes that its specialist ecological advisor is of the professional opinion the information provided as part of the Environmental Statement is sufficient to prepare a complete assessment, and represents a reasonable worst case scenario.</p>
Water voles	<p>Water vole surveys were completed in 2023 and have been updated in June 2025. Data from these surveys will be included as part of the Environmental Statement and the assessment assumes presence of water voles everywhere within the Order</p>

Survey	Applicant's Response
	<p>Limits, despite several ditches not providing suitable habitat. It is therefore a reasonable worst case assessment.</p> <p>A further period of water vole surveys will be completed across Parcels A-E in September 2025. Based on the results from June 2025 and previously in 2023, no significant changes to the results are anticipated. This will again allow interested parties the opportunity to make any representations on the additional survey information provided.</p> <p>Notwithstanding the absence of the September 2025 data, the Applicant notes that its specialist ecological advisor is of the professional opinion the information provided as part of the Environmental Statement is satisfactory to prepare a complete assessment, and represents a reasonable worst case scenario.</p>
Great Crested Newts	<p>Surveys have been completed in 2025 across the entirety of Parcels A-E, including the additional areas added through the pre-application process. This data will be included in the Environmental Statement.</p>
Breeding birds	<p>All land within Parcels A-E has one year of completed breeding bird surveys. Due to the evolving Order Limits during the pre-application stage, additional surveys were undertaken in the 2025 season to cover land added to Parcels A-E during the pre-application process. These surveys concluded in July 2025 and the raw data will be provided as part of the DCO application and considered within the Environmental Statement.</p> <p>The data will be processed and packaged with accompanying analysis, which will be submitted as an update to the Planning Inspectorate in October 2025. The Applicant notes that its specialist ecological advisor does not anticipate this packaged data altering the assessment of effects in the Environmental Statement or the proposed mitigation strategy.</p>

In accordance with the Inspectorate's observations, the Applicant is confident that the approach above meets the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 in providing information reasonably required to reach a reasoned conclusion based on a reasonable worst case scenario, is consistent with established precedent and practice of accepted DCO

applications, and relevant case law (in particular, R (Jones) v Mansfield District Council [2003] EWCA Civ 1408 at [39], and National Trusts' Application [2013] NIQB 60 at [70]). The Applicant will outline the position set out in the above table as part of the DCO application.

Notwithstanding that the information to be included in the DCO application will meet the requirements of the EIA Regulations in providing a reasonable worst case scenario, where the Applicant intends to submit additional data (in the case of bats and water voles) or an update to existing data (in the case of breeding birds), this would be before the start of Examination in all instances, and would therefore allow interested parties to make representations on such information. The Applicant notes the advice conveyed by the Inspectorate at a meeting on 15th August 2025 that an application can be accepted where potential matters can be resolved during or before an Examination and that it is not uncommon to supplement survey data following the submission of a DCO application.

Other matters the Applicant is advised to address prior to submission

The Applicant will provide a detailed tabular response outlining how each of the other matters raised by the Inspectorate in its section 51 advice letter has been addressed as part of its new DCO application. For avoidance of doubt, this response will also address the Inspectorate's main observations as outlined under the previous header.

Concluding comments

The Government's ambition is to accelerate the deployment of new renewable energy generation this side of 2030 (as confirmed in the Clean Power 2030 Action Plan). As an 800MW project with a connection agreement to begin exporting electricity to the national electricity transmission system from 2029, the Scheme has the potential to make a significant contribution to meeting the Government's targets.

The Applicant thanks the Inspectorate once again for its advice and for the positive approach the Inspectorate has taken to support the Applicant in preparing a new DCO application for submission.

Yours sincerely,



Adam Swarbrick
Head of Solar and Storage UK
RWE Renewables Europe & Australia GmbH



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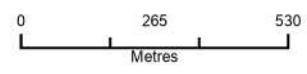
Attachment A – Plan showing changes to Order Limits

☐ Order Limits

- The drawing is for illustrative purposes only.



Plan showing change to Order Limits



Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

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