

The Examining Authority  
Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House, 2 The Square  
Bristol  
BS1 6PN

Interested Party ref: F1C2DDF91  
Your ref: EN010148  
Date: 05 May 2026

**Order Granting Development Consent for Tween Bridge Solar Farm at Land either side of the M180, High Level Banks (the A18) and the Stainforth and Keadby Canal (EN010148)**

**Deadline 1: Written Representations**

Dear Sir

On 24 December 2025, the Environment Agency made Relevant Representations [[RR-009](#)] on the proposal by RWE Renewables UK Solar and Storage Limited ('the Applicant') to construct, operate, manage and decommission a ground mounted solar photovoltaic (PV) electricity generating facility ('the project').

The purpose of these Written Representations is to provide an update on the issues, which require further discussion/negotiation, as outlined in our Relevant Representations.

Some points raised in these Representations have been considered in connection with the Statement of Common Ground (SoCG) being prepared by the Applicant and will be submitted at Deadline 1.

**1.0 Draft Development Consent Order (Rev 2) [[AS-002](#)]**

**1.1 Article 2 'Interpretation'**

We have no updates regarding our request that 'remedial works in respect of any contamination' is removed from Article 2.

1.2 **Article 9 and Schedule 13, Part 5, For the protection of the Environment Agency**

The Environment Agency has had productive engagement with the Applicant and reached agreement on the wording of the Protective Provisions, to allow the disapplication of Regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016 (requirement to obtain a flood risk activity permit). We would welcome the inclusion of the agreed Protective Provisions within a revised draft of the Development Consent Order ('DCO').

1.3 **Schedule 2, Part 1, Requirement 7 (Fire Safety Management)**

The Applicant has confirmed in the draft SoCG that the Environment Agency will be included as a consultee for the Battery Fire Safety Management Plan. We welcome our inclusion as a consultee to this requirement within a revised draft of the DCO.

1.4 **Requirement 8 (Landscape and Ecology Management Plan), 14 (Construction Environmental Management Plan), 19 (Decommissioning and restoration)**

We have no update regarding our request to be included as a specific consultee on these Requirements and would be pleased to have further discussion on these with the Applicant.

1.5 **Request for additional Requirements (Land Contamination and groundwater, and Piling Risk Assessment)**

We have no update regarding our request for additional Requirements, outlined in Paragraph 3.8 and 3.9 of our Relevant Representations [[RR-009](#)]. We would welcome further engagement with the Applicant on these matters and will update the Examining Authority (ExA) on the progress of negotiations on this matter during the Examination.

1.6 **Land matters: Book of reference [[APP-021](#)]**

We have no updates on this matter. We are still in the process of carrying out assessments to understand the potential effects of the acquisitions sought by the Applicant. We will continue to consider this matter and engage with the Applicant during the Examination. We will update the ExA in due course.

1.7 **Chapter 7: Ecology and Nature Conservation [[AS-012](#)]**

Since providing our Relevant Representations, we have received a copy of the Biodiversity Net Gain (BNG) Metric dated 18 July 2025. We have considered the Metric in relation to the watercourses element only and have the following additional comments to make.

There appears to be a contradiction between the BNG Metric and the BNG Assessment [APP 082]. Paragraph 2.12 of the BNG Assessment states that all ditches are being retained and enhanced as part of the Scheme. However, in the Metric, only Ditches under Reference 3, those that are in Poor condition, are showing as being enhanced.

The DCO application outlines that 125 locations are presumed to require either the creation of a new culvert or the reinforcement/widening of an existing culvert/bridge structure [APP-039]. Whilst the Metric calculation shows that watercourses will meet the 10% BNG uplift, this does not take into account impacts to existing culverts or the creation of new culverts.

We advise that any new culverts should be recorded as lost, which will reduce the overall watercourse footprint, but this does not appear to have been the approach taken. We therefore consider it likely that additional enhancements will be required to mitigate these effects to ensure delivery of 10% net gain.

1.8 **Chapter 9: Ground Conditions [APP-046]**

We have no updates to make in relation to Chapter 9 of the Environmental Statement.

1.9 **Chapter 10: Water resources [APP-047]**

Flood risk

We have had positive engagement with the Applicant regarding our flood risk advice contained in our Relevant Representations. In Paragraphs 7.0, 7.6 and 7.7 of our Representations, we raised concerns about the proposed access track raising potentially increasing flood risk to third parties in the River Torne floodplain. We have discussed this matter with the Applicant and understand that they are undertaking further work to justify the conclusions of the submitted flood risk assessment (that there will be impact on existing floodplain storage). We welcome further work being undertaken on this issue and look forward to reviewing any additional details upon receipt of them.

Battery energy storage systems (BESS)

We have had productive discussions with the Applicant regarding our advice on the risk to the environment associated with the proposed BESS. The Applicant confirmed that further details on the BESS will likely be included in a revised flood risk assessment. The Applicant also provided additional clarification that the Environment Agency will have the opportunity to advise on the details of the BESS at the detailed design stage. We will review any further information upon receipt of it and update our advice accordingly.

1.10 **Other matters**

For the avoidance of doubt, we have no updates regarding other matters raised in our Relevant Representations. We will provide further advice to the ExA on these matters during the Examination following any updates or revisions.

1.11 **Summary**

In summary, whilst progress on the issues raised in our Relevant Representations has been made, there are still some outstanding issues, and we wish to see additional information on matters in revised documentation submitted as part of the DCO. As such, we continue to maintain the holding objections in respect of landholdings, increase in flood risk to third parties and BESS drainage.

Our views are given without prejudice to any future detailed representations that we may make throughout the examination process. We reserve the right to add to or amend these representations, including requests for DCO Requirements, should further information be forthcoming during the examination on issues within our remit.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

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**Sustainable Places Planning Advisor**

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