

Tween Bridge Solar Farm

8.2 Response to Relevant Representations

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

Document Reference: 8.2

Deadline 1 May 2026

Revision 1

Table of Contents:

1	Introduction	2
1.1.	Purpose of this document	2
2	Table 2-1 City of Doncaster Council Representation.....	3
3	Table 3-1 North Lincolnshire Council Representation	46
4	Table 4-1 Environment Agency	47
5	Table 5-1 Natural England Representation.....	62
6	Table 6-1 Lincolnshire Wildlife Trust Representation	114
7	Table 7-1 Canal & River Trust	122
8	Table 8-1 National Highways.....	125
9	Table 9-1 National Grid Electricity Transmission Representation	130
10	Table 10-1 Humberside Police Representations.....	134
11	Table 11-1 Doncaster East Internal Drainage Board Representations	136
12	Table 12-1 Isle of Axholme & North Nottinghamshire Water Level Management Board Representations....	138
13	Table 13-1 Network Rail Infrastructure Limited Representation	141
14	Table 14-1 Northern Powergrid (Yorkshire) Plc Representation.....	142
15	Table 15-1 UK Health & Safety Agency Representation.....	143
16	Table 16-1 Cadent Gas Ltd Representation.....	144
17	Table 17-1 South Yorkshire Police Representation.....	145
18	Table 18-1 National Gas Transmission Representation	146
19	Table 19-1 NATS Representation.....	146
20	Table 19-1 Exolum Pipeline Systems Ltd Representation	147
21	Table 21-1 Relevant Representations from Residents.....	148

1 Introduction

1.1. Purpose of this document

- 1.1.1. This document is submitted by RWE Renewable UK Solar and Storage Ltd (the 'Applicant') and presents the Applicant's response to the relevant representations submitted by interested parties during the consultation period following acceptance of the Tween Bridge Solar Farm DCO Application which closed on Friday 2 January 2026.
- 1.1.2. The Applicant's response is presented in a tabulated format.

2 Table 2-1 City of Doncaster Council Representation

Consultee	Representation	Applicant's Response
<p>City of Doncaster Council</p>	<p>1. Introduction</p> <p>1.1 City of Doncaster Council (CDC) is aware that as a host Authority we will be automatically registered as an Interested Party in the Examination, under Section 102(1)(c) of the Planning Act 2008, and therefore the Council's views will be considered for the duration of the Examination.</p> <p>1.2 This document – being the Council's Relevant Representation – provides a summary of the main aspects of the proposal with which the Council agrees and/or disagrees together with explanations as appropriate.</p> <p>1.3 To assist the Examining Authority (ExA) in forming its initial assessment of principal issues in advance of the preparation of the draft examination timetable, and ahead of the submission of our Local Impact Report, CDC wishes to make the following initial representation to identify its main areas of interest at this stage in relation to the Development Consent Order application.</p> <p>1.4 CDC acknowledges that there is a recognised need and support for renewable and low carbon energy technology through national planning policy and that the proposed development would contribute towards the targets set for the UK's greenhouse gas emission reduction and increasing the country's energy supply from more renewable sources. Equally, promotion of renewable and low carbon sources of energy in suitable locations across the Borough are central to achieving our commitments on both reducing carbon emissions and combating the effects of climate change.</p> <p>1.5 CDC considers that the main issues arising from the proposed Tween Bridge Solar Farm project at this stage are as follows:</p> <ul style="list-style-type: none"> • Matters of principle • Landscape and visual impacts • Ecology and nature conservation • Cultural Heritage and archaeology • Socio-economic impacts including opportunities for local employment generation • Transport and access • Loss of agricultural land 	<p>The Applicant notes the comments on paragraphs 1.1 – 1.6 of the City of Doncaster Council's response.</p>

Consultee	Representation	Applicant's Response
	<ul style="list-style-type: none"> • Ensuring that glint and glare impacts in respect of Doncaster Sheffield Airport are properly assessed • Ensuring that the contents of the Draft Development Consent Order properly and fully reflect the Council's operational requirements in all respects. <p>1.6 CDC will, at the required time, be producing a Local Impact Report which will set out its position in full in respect of these issues, but to assist at this stage, they are further discussed below.</p>	
	<p>1.7 The Council does, however, also reserve its position to make further, more detailed representations on all technical matters as the process continues. In this respect, CDC would again reference the lack of meaningful engagement it has had with the Applicant to date, and the Applicant's apparent lack of commitment to such engagement, which has previously been set out at earlier stages. CDC is also extremely concerned that the Applicant has sought to expedite the process, resulting in Relevant Representations being sought over the Christmas holiday period. CDC considers that the consequence of this is that fewer interested parties will be engaged in the process.</p>	<p>The Applicant strongly disagrees with the Council's comments made in Paragraph 1.7. Each of these are discussed in turn.</p> <p>A summary of the extensive pre-submission consultation is provided in Table 2-1 of the Consultation Report [APP-022]. This includes details of the detailed non-statutory consultation in 2023, which was supported by a Preliminary Environmental Information Report, and the statutory consultation in 2025. Appendix 2.1 of the Consultation Report also provides the Applicants Adequacy of Consultation Milestone Statement which provides and overview of the engagement and consultation activity up to submission, and how it has met with the requirements of the Planning Act 2008.</p> <p>Details of the engagement are also summarised within each chapter of the Environmental Statement [APP-037 to APP-055]</p> <p>The Applicant did not intentionally submit the application so that the consultation period would run over the festive period. As explained to the City of Doncaster Council, North Lincolnshire Council and the Planning Inspectorate, and referred in the Applicant's Covering Letter [APP-003], in response to the Government's Clean Power 2030 Action Plan grid reforms, the submission of the application was brought forward. The period for Relevant Representations to made to the Planning Inspectorate was extended beyond the statutory 28 days to over six weeks (17 November 2025 – 2 January 2026) which is far wider than the Christmas holiday period.</p>
	<p>2. Proposed Development:</p> <p>2.1 The main element of the Scheme is the construction, operation, maintenance and decommissioning of a ground mounted solar farm with an intended design capacity of over 50MW, and battery energy storage system (BESS). Once fully operational, the CDC understands</p>	<p>The Applicant confirms that the Scheme description is presented within the ES Chapter 2 Scheme Description [APP-039].</p>

Consultee	Representation	Applicant's Response
	<p>that the Scheme will export approximately 800MW of electricity to the National Electricity Transmission System (NETS).</p> <p>2.2 The detailed Scheme Description can be found at Chapter 2 of the Environmental Statement: Document Reference: 6.1.2 [APP-039] and is not repeated in full here.</p>	
	<p>3. Relevant Planning Permissions & Cumulative Impacts:</p> <p>3.1 For the purposes of assessing the cumulative effects, the Council relies on the List of Cumulative Schemes set out in Environmental Statement Appendix 17.1 Cumulative Long List [APP-126] and Environmental Statement Appendix 17.2 Cumulative Short List [APP-127]. Reference is also made to Environmental Statement Chapter 17: Cumulative Impacts [APP-054] and Environmental Statement Figure 17.1: Cumulative Sites Plan [APP-175].</p> <p>3.2 In this respect, CDC can advise as follows:</p> <p>3.3 23/02642/FULM [cited as No. 27, APP-126] has now been granted planning permission.</p> <p>3.4 25/00287/OUTM [cited as No. 22, APP-127] was refused planning permission on 12.12.2025</p> <p>3.5 Whilst the above development at Hurst Lane, Auckley has been accounted for in the Cumulative Short List [APP-127], CDC cannot find reference within the documents to developments in very close proximity at land south of Hurst Lane, Auckley, which have resolutions to grant planning permission, subject to the finalisation of Section 106 agreements (currently at an advanced stage). These are set out as follows and CDC would question why they have been excluded from the cumulative assessment, along with other committed development at the airport itself. This should be rectified, or a satisfactory explanation provided setting out why they have been excluded from the assessment:</p> <p>3.6 25/00136/OUTA Outline planning application (with all matters reserved except external vehicular highway access) for residential development (Use Class C3), provision of coworking hubs, with land allocated for a single form entry primary school (if required), including the demolition of Warren House Farm and the provision of drainage (including SUDS), public open space with children's play space, enhancements to existing footpaths/tracks, new footpaths and cycleways (including the creation of an active travel corridor) – Resolved to grant planning permission on 18.11.2025.</p> <p>3.7 25/00137/OUTA Outline planning application (with all matters reserved except external vehicular highway access) for multi-tenure residential development (Use Class C2/C3) (including affordable housing, later living, retirement accommodation, assisted living, build to rent and other complimentary/multi-tenure/specialist housing) with land identified for a single form entry primary school (if required), including the demolition of Warren House Farm and the provision of community buildings (Use Classes E, F1 (a-g), F2 (a-d), sui generis uses comprising drinking</p>	<p>The Applicant is grateful to City of Doncaster Council for advising that application 25/00287/OUTM was refused. The Applicant notes that the development will remain on the shortlist to reflect the potential for an appeal submission within 6 months of the decision date. If no appeal has been submitted, it will subsequently be removed from the Cumulative Shortlist Appendix 17.2 [APP-127]. Notwithstanding this position, this shortlisted cumulative site had not led to any significant cumulative effect predicted within the ES.</p> <p>Application 23/02642/FULM was identified as Site 27 on the Cumulative Long List Appendix 17.1 [APP-126]. Although this application was approximately 6.6km from the Scheme it was excluded from the cumulative shortlist since its scale and nature were unlikely to lead to a significant cumulative effect with the Scheme.</p> <p>Applications 25/00316/OUTA and 25/00137/OUTA are approx. 11.65km from the nearest point of the Scheme. This is outside of the 10km Zone of Influence (ZOI) (biodiversity) that was set in the cumulative site methodology. The ZOI that was set for all other environmental disciplines is less than 10km. These distances are listed in Table 17.5 of Chapter 17 Cumulative Impacts of the ES [APP-054]. Application 20/03415/FULM is approx. 11.34km from the nearest point of the Scheme and was excluded from the cumulative long list for the same reason.</p> <p>With regards to paragraph 3.5 of City of Doncaster Council representation, the Applicant confirms that Doncaster Sheffield Airport is south of the Scheme. At its closest point it is approx. 9.57km from the Scheme. This assumes the airport's northern boundary is the railway line. None of the proposed or approved planning applications that link to Doncaster Sheffield Airport are within 10km of the Scheme and therefore none fall within the presented criteria for cumulative assessment.</p>

Consultee	Representation	Applicant's Response
	<p>establishments with expanded food provision, co-working hubs (Use Classes E, F1 (a-g), F2 (a-d)), drainage works (including SUDs), public open space with children's play space, enhancements to existing footpaths/tracks, new footpaths and cycle ways (including the creation of an active travel corridor) – Resolved to grant planning permission on 18.11.2025.</p> <p>3.8 Linked to these two outline applications directly above is planning application reference 20/O3415/FULM, which was granted planning permission on 20th December 2024 for a mixed use development (in hybrid form) comprising:</p> <p>a) An application for full planning permission for the construction of highway/drainage infrastructure and strategic landscape planting within the application site; and</p> <p>b) An application for outline planning permission with all matters reserved (except access) for up to maximum floorspace of 42,689sqm GIA, comprising of:</p> <p>13,572m2 of floorspace to be used within Class E(g) (offices)</p> <p>12,143m2 of floor-space to be used within Class C3 (residential)</p> <p>8,826m2 to be used within Class C1 (up to 3 hotels)</p> <p>3,529m2 to be used within Classes E(a) (b) & Sui Generis (r) (retail /restaurant / cafe / hot food takeaway)</p> <p>2,833m 2 to be used within Classes E(a)/E(c)/E(b)/ SG (p)/SG (r)/ E(e) or E(f)/ (retail / financial and professional services / restaurant / cafe / drinking establishment / hot food takeaway and community facilities such as medical facilities or creche)</p> <p>1,700m2 to be used within Class E(a) (food-retail)</p> <p>919m2 to be used within Classes E(b) / SG(r) (restaurant / cafe / hot food takeaway)</p> <p>473m2 to be used within Class E(a) / Sui Generis (retail / petrol filling station) and</p> <p>314m2 to be used within Classes SG(q) (public house) together with facilities for the storage of waste, car parking, landscaping, site re-profiling, drainage and utilities infrastructure.</p> <p>3.9 CDC reserves its position to make more detailed commentary on this matter within the Local Impact Report. In general, whilst not committed developments at this point for the purposes of the ES, there are two other substantial solar farm DCO projects in the pipeline within the Borough (and into neighbouring authorities), which may have progressed by the time of the Local Impact Report or into the Examination and these will be referenced in detail at those stages, where possible to do so in order to give the fullest, and most up to date position to assist the Examining Authority. Similarly, Town and Country Planning applications currently undetermined may have been determined by these stages and will also be referenced accordingly.</p> <p>3.10 In the meantime, the following information is provided:</p>	<p>For clarification the Glint and Glare section of Chapter 16: Other Topics of the ES [APP-053] considered the possible impacts on Doncaster Sheffield Airport the majority of which is located outside of 10km for the Scheme. This airport was included in the Glint & Glare assessment to ensure it was robust. There is no significant impact from Glint and Glare on aircraft using Doncaster Sheffield Airport.</p> <p>Fenwick Solar Farm (Application No EN010152) is cumulative site No. 24 within the shortlisted sites, and was granted development consent on 18 February 2026. Its status from 'at Examination' to 'pending SoS decision' will be updated the next time that ES Chapter 17:Cumulative Impacts [APP-054] is updated in the Examination.</p> <p>Whitestone Solar Farm (EN0110020) is located approximately 21.5km from the Scheme. Area Whitestone 1 is located within City of Doncaster Council, the remaining two areas are within Rotherham Metropolitan Borough Council (RMBC). This scheme is currently in pre-application stage. The applicant for this scheme is stating that their application will be submitted in May 2026 according to their website www.whitestonesolarfarm.co.uk</p> <p>The Whitestone Solar Farm Scoping Opinion listed in Appendix F sites that are currently being considering cumulatively. The Scheme was not included on this list. PINS offered no comment in the Scoping Response that the Scheme should be brought into the cumulative assessment. Therefore, Whitestone Solar Farm will not be added to cumulative shortlist for further assessment during the Examination. At its closest point, Whitestone Solar Farm is located 20km from the Scheme.</p>

Consultee	Representation	Applicant's Response
	<ul style="list-style-type: none"> • The ExA's recommendation has been sent to the Secretary of State in respect of the Fenwick Solar Farm DCO1 as of 08 December 2025. • Whitestone Solar Farm DCO2 is expected to be submitted between April and June 2026 	
	<p>4. Legislative & Policy Context</p> <p>4.1 The legislative basis for the proposed development is set out within The Planning Act 2008, which defines the process under which consent for Nationally Significant Infrastructure Projects are determined. National Policy Statements:</p> <p>4.2 In accordance with Section 104(2) of the Planning Act 2008, the Secretary of State is required to have regard to any relevant national policy statements, amongst other matters, when deciding whether or not to grant a Development Consent Order.</p> <p>4.3 The relevant National Policy Statements ("NPSs") include the Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero, published January 2024), the National Policy Statement for Renewable Energy and Infrastructure (EN-3) Department for Energy Security and Net Zero, published January 2024) and the National Policy Statement for Electricity Networks Infrastructure (EN-5) Department for Energy Security and Net Zero, published January 2024).</p> <p>4.4 This represents the primary policy basis for the determination of this application.</p> <p><u>National Planning Policy Framework (2024)</u></p> <p>4.5 In accordance with Section 104(2)(d) of the Planning Act 2008, the NPPF is capable of being "important and relevant".</p> <p>4.6 Paragraph 5 of the NPPF states that the Framework does not contain specific policies for nationally significant infrastructure projects and that applications for NSIP are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the NPPF).</p> <p>4.7 The NPPF does, however, state that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure (paragraph 161).</p> <p><u>Local Planning Policy Context:</u></p>	<p>In response to Paragraphs 4.1-4.4, the Applicant agrees the NPSs are the primary policy basis for determining this application. New NPSs came into force 6 January 2026 and the Applicant confirms that the Policy Compliance Document [APP-031] will be updated for Deadline 2 to take account of the new NPSs. The Applicant notes that paragraph 1.6.2 of EN-1 (published January 2026), identifies how the <i>"The Secretary of State has decided that similar transition provisions should apply for the 2025 NPSs, so that for any application accepted for examination before the final publication of the approved 2025 amendments, the 2024 suite of NPSs should have effect in accordance with the terms of those NPSs."</i></p> <p>Accordingly, the 2025 amendments will therefore have effect only in relation to those applications for development consent accepted for examination after the final publication of those amendments. However, the latest NPSs could be important and relevant in the decision making process.</p> <p>The Applicant agrees that Paragraph 5 of the NPPF (Dec 2024) confirms that it does not contain specific policies for NSIPs, and so does not have direct effect in relation to the Scheme. However, the NPPF may be a relevant matter in the SoS's decision making. See Paragraph 6.4.1 of the Applicant's Planning Statement [APP-030].</p> <p>The Applicant acknowledges that local planning policies may contain matters of relevance to the Scheme, see Paragraph 6.5.1 of the Applicant's Planning Statement [APP-030].</p> <p>An overview of the relevant policy and legislative context relevant to the EIA process is also presented within the ES Chapter 5: Policy and Legislative Context [APP-042], specifically Section 5.5 and Table 5.1</p>

Consultee	Representation	Applicant's Response
	<p>4.8 Whilst not determinative under the Planning Act 2008, the ExA can consider other important and relevant matters, including local planning policy. For the purposes of section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for Doncaster comprises:</p> <ul style="list-style-type: none"> • Doncaster Local Plan (“DLP”) (adopted 2021)³ • Barnsley, Doncaster and Rotherham Joint Waste Plan (“JWP”) (adopted 2012).⁴ <p>4.9 The Council consider the following policies of the DLP to be relevant:</p> <ul style="list-style-type: none"> • Policy 2: Level of Growth • Policy 3: Employment Allocations • Policy 13: Promoting Sustainable Transport in New Developments • Policy 18: Development Affecting Public Rights of Way • Policy 19: Access, Design and Layout of Public Rights of Way • Policy 20: Public Rights of Way Crossing Roads, Railways, Canals and Rivers • Policy 25: Development in the Countryside Area • Policy 29: Ecological Networks • Policy 30: Valuing Biodiversity and Geodiversity • Policy 31: Local Wildlife and Geological Sites • Policy 32: Woodlands, Trees and Hedgerows • Policy 33: Landscape • Policy 34: Valuing our Historic Environment • Policy 35: Understanding and Recording the Historic Environment • Policy 36: Listed Buildings • Policy 37: Conservation Areas • Policy 39: Development Affecting Archaeology • Policy 48: Landscaping of New Developments • Policy 54: Pollution • Policy 58: Low Carbon and Renewable Energy <p>4.10 The Order limits also fall within the Thorne and Moorends Neighbourhood Plan (up to 2032) limits. Policy RE1: Solar Power Energy Schemes of the Plan is therefore applicable.</p> <p>4.11 The Council considers the following guidance and documents to be relevant:</p>	

Consultee	Representation	Applicant's Response
	<ul style="list-style-type: none"> • Doncaster Renewable and Low Carbon Study (July 2012) which highlights the key opportunities for different forms of renewable energy in the Borough⁵ • Landscape Character and Capacity Study (2007)⁶ • Biodiversity Net Gain Supplementary Planning Document (September 2022)⁷ • Local Labour Agreements Supplementary Planning Document (adopted August 2023) ⁸ <p>4.12 Other relevant Council initiatives include:</p> <ul style="list-style-type: none"> • Doncaster Green Infrastructure Strategy 2014 – 2028⁹ • Doncaster Delivering Together (“DDT”)¹⁰ <p>4.13 Launched in September 2021, DDT is the Council's ten-year Borough strategy. DDT is about everyone being able to thrive and contribute to thriving communities and a thriving planet. This strategy does not form part of the adopted development plan, but it is important that the policies of the Doncaster Local Plan achieve the DDT's aims and objectives. The DDT has identified 8 priorities to deliver for Doncaster over the next ten years, which are:</p> <ul style="list-style-type: none"> • Tackling climate change. • Developing the skills to thrive in life and work. • Making Doncaster the best place to do business and create good jobs. • Building opportunities for healthier, happier, and longer lives for all. • Creating safer, stronger, greener, and cleaner communities where everyone belongs. • Nurturing a child and family – friendly borough. • Building transport and digital connections fit for the future. • Promoting the borough and its cultural, sporting and heritage opportunities. <p>4.14 With this context in mind, CDC makes the following detailed comments at this stage</p>	
	<p>5. Principle of renewable energy and impacts on climate change:</p> <p>5.1 The Applicant should be aware that CDC at its Full Council meeting on 18 September 2025 made the following resolution¹¹:</p> <ol style="list-style-type: none"> 1. To adopt a political stance, consistent with planning law and the Local Plan, in favour of small, discrete, solar panel installations, supporting their installation on: – Rooftops of commercial, residential, and public buildings. – Car parks through the development of solar canopies. 2. To encourage the use of brownfield land for large-scale solar farms. 	<p>Whilst the Applicant acknowledges that the Council is in favour of rooftop solar generation, the energy NPS make clear that there is an urgent need for all forms of renewable energy generation, including large scale ground mounted solar and battery storage. The Applicant also notes how the Council declared a climate change emergency in 2019 in line with national government. The application of NPS EN-1 attributes Critical National Priority status to the Scheme.</p> <p>The Applicant notes the reference to paragraph 5.5 of the Local Plan, which, amongst other things, explains that renewable and low carbon sources of energy are central to achieving the Council's commitments</p>

Consultee	Representation	Applicant's Response
	<p>3. To actively encourage partnerships with private and public sector organisations to maximise the use of existing infrastructure for renewable energy projects.</p> <p>4. To call upon and lobby regional and national government to develop policies that align with these priorities and provide financial incentives for rooftop and car park solar projects as and when funding becomes available.</p> <p>5. That the Council's Chief Executive write to the relevant Government Minister(s) informing them of the outcome of this motion and that the letter be counter-signed by such Council Group leaders who wish to do so.</p> <p>5.2 This was followed by a subsequent motion being passed specifically in respect of the Whitestone Solar Farm, but where a more overarching position on solar farms was also set out on 27 November 2025.¹²</p> <p>5.3 At a local level, Chapter 3 of the Doncaster Local Plan sets out the vision for Doncaster in 2035. A key part of this vision relates to the need to reduce dependency on fossil fuels to reduce locally produced greenhouse gas emissions and minimise the impacts of climate change in line with the Sheffield City Region and encourage the transition to a low carbon borough. The vision also recognises the need to encourage more efficient use of natural resources, including water, to secure and maintain a steady and adequate supply of mineral resources to facilitate development, and to protect and enhance the quality of our water and soil resources (including high grade agricultural land).</p> <p>5.4 Policy 58 of the DLP sets out how proposals for renewable and low carbon energy generation will be considered by the Council. It states as follows:</p> <p>The Council aims to increase the supply of low carbon and renewable energy generated in the Borough, in accordance with the principles set out below:</p> <p><i>"A) Proposals will be supported which give priority to:</i></p> <ol style="list-style-type: none"> <i>1. Community energy schemes that are in full or part community ownership</i> <i>2. Biomass and energy crop schemes especially to the north and southeast of the main urban area, for example mixed woodland, single species short rotation forestry and large scale forestry, outside of areas of high quality arable farmland</i> <i>3. Heat or power generation from light, water, waste and other low carbon heat sources</i> <i>4. Landfill and sewage gas energy generation schemes</i> <i>5. Wind power projects which meet the criteria of Policy 59; and</i> <i>6. Micro-renewable energy technologies and decentralised heat and power systems within new development.</i> 	<p>to both reducing carbon emissions and combatting the effects of climate change. This is consistent with paragraph 1.4 of the Council's representation whereby the Council acknowledges that there is a recognised need and support for renewable and low carbon energy technology through national planning policy and that the proposed development would contribute towards the targets set for the UK's greenhouse gas emission reduction and increasing the country's energy supply from more renewable sources. The Applicant also notes that the Scheme accords with the six listed principles set out under section B of Policy 58 B1 to B6.</p>

Consultee	Representation	Applicant's Response
	<p><i>B) In all cases, low carbon and renewable energy proposals will be supported where they:</i></p> <ol style="list-style-type: none"> <i>1. Have undertaken community engagement and demonstrate how they will deliver environmental, social and economic benefits</i> <i>2. Have no unacceptable adverse effects on local amenity and air quality and include appropriate stand-off distances between technologies and sensitive receptors, such as residential areas</i> <i>3. Allow the continued safe and efficient operation of Doncaster Sheffield Airport</i> <i>4. Would have no unacceptable adverse effects on highway safety and infrastructure</i> <i>5. Have no unacceptable adverse impacts, including cumulative impacts, on the built and natural environment (including landscape character, and historic and nature conservation assets, such as Thorne and Hatfield Moors); and</i> <i>6. Reclaim the site to a suitable and safe condition and use (such as agriculture or nature conservation) within a defined and agreed period should the development cease to be operational".</i> <p>5.5 In support of this policy,. This is in line with the Council's aspirations to become a low carbon borough. However, it is equally recognised that the potential negative effects of these sources need to be carefully assessed and managed on a case-by-case basis.</p> <p>5.6 To guide developers, the Doncaster Renewable and Low Carbon Study highlights the key opportunities for different forms of renewable energy in the Borough. The Landscape Character and Capacity Study also assesses the potential of the landscape to accommodate such development (albeit the focus in this respect is on wind rather than solar).</p> <p>5.7 There is a need to balance the need to provide a continuous supply of renewable energy and encourage sources of low-cost energy whilst protecting the interests of local communities and historical, cultural and environmental assets. The policy sets out the main criteria that will be used to assess renewable energy proposals. Whilst the policy is not specific on which renewable energy technologies will be acceptable, it highlights key opportunities and challenges and explains how renewable energy projects can support wider policy aspirations.</p> <p>5.8 The Doncaster Renewable and Low Carbon Energy Study (2012) indicated at that time that Doncaster made a significant contribution to renewable energy generation in the Yorkshire and Humber Region. It was ranked the second highest authority producing 12.8% of the Region's total in 2012. The Study also assessed the technical potential for renewable and low carbon energy resources within the Borough. It found that although environmental constraints such as landscape character reduce the overall opportunities for wind development, there was still significant potential to capitalise on wind resources. The Study showed that the Borough has significant biomass resource potential that could fuel district heating networks.</p>	

Consultee	Representation	Applicant's Response
	<p>5.9 CDC understand that by its very nature, the proposed development would have positive impacts in terms of the production of clean renewable energy and the transition and movements towards net zero in accordance with local planning policies. Notwithstanding this, it must be demonstrated that there are no significant adverse environmental impacts that cannot be appropriately managed and/or mitigated through the DCO process.</p> <p>5.10 These impacts are discussed further in the following sections of this Relevant Representation.</p>	
	<p>6. Landscape and visual impacts (ES Chapter 6)</p> <p>6.1 The commentary provided below should be read in conjunction with that contained at Section 8 in respect of the historic landscape.</p> <p>6.2 CDC made clear in its response to the Statutory Consultation, it's expectation that the impacts of the proposed development on Thorne and Hatfield Peat Moorlands must be fully assessed. It is therefore disappointing that only very scant regard continues to be given to this important landscape.</p>	<p>The Applicants duly notes the comment at paragraph 6.1.</p> <p>The National Nature Reserves [NNRs] are subject to ecological designations which have been closely considered in the ES Chapter7: Ecology and Nature Conservation [APP-O44]. However, whilst they include CRoW Access Land (as shown on ES Figure 3.1 [APP-140]), Thorne and Hatfield Moors are not covered by any national or local landscape designations. Notable shrubby and woody vegetation on the peripheries of both areas of moors provide notable containment and screening bar from the very peripheries of the areas, with much of the areas providing inward looking views.</p>
	<p>6.3 In this respect, CDC notes that Figure 6.3 – Screened Zone of Theoretical Visibility with Viewpoints and Photomontage Locations [APP-147] indicates that there is limited visibility from Humberhead Peatlands National Nature Reserve due to extensive woodland vegetation and therefore, the Applicant considered that no detailed consideration was deemed necessary for this assessment. CDC would strongly question the Applicant's logic behind not including viewpoints taken from the Nature Reserve to evidence this position.</p>	<p>ES Figure 6.3: Screened Zone of Theoretical Visibility with Viewpoints and Photomontage Locations [APP-147] shows very limited visibility within both NNRs and any related public rights of way, (noting that both contain Access Land and promoted routes which also show very limited visibility). Viewpoints have been chosen on the periphery of the areas, on junctions with rights of way and permissive routes to illustrate a worst case scenario, namely Viewpoints 2, 4 and 20 on the southern edges of Thorne Moors and viewpoint 12 on the northern edge of Hatfield Moors.</p> <p>Table 6.4 of ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2] sets out the Viewpoint and Photomontage Locations, which in paragraph 6.4.62 are considered to provide representative views towards and in some cases from within the Order Limits from the surrounding landscape as illustrated on ES Figure 6.3 – Screened Zone of Theoretical Visibility with Viewpoints and Photomontage Locations [APP-147] and presented in Viewpoint Photographs in ES Appendix 6.3 – Viewpoint Photographs [APP-O63 – APP-O66].</p>

Consultee	Representation	Applicant's Response
		<p>The NNRs have also been considered in terms of effects upon their landscape character as part of the assessment of landscape character areas and types as defined in the Doncaster Landscape Character and Capacity Assessment of Doncaster Borough (March 2007).</p>
	<p>6.4 Moreover, in terms of wider impacts, the special qualities of the landscape character of the area, including that within the proposed Order limits has been significantly downplayed, and CDC is concerned that this altogether cynical approach has infected the conclusions contained within the ES in terms of overall impacts.</p>	<p>The term 'Special Qualities' is usually attributed to protected areas such as National Landscapes and National Parks, as previously noted, the area whilst subject to ecological designations is not covered by any landscape designations. Whilst the components of the landscape character of the area contain the large lowland raised bog areas of Thorne and Hatfield Moors and large areas of farmland, this landscape is subject many layers of man-made intrusions, it has been heavily engineered and continues to be heavily managed.</p>
	<p>6.5 CDC would emphasise in the strongest of terms that this is a highly distinctive landscape which includes intact farmland with few 'man-made' intrusions as well as the large lowland raised bog areas of Thorne and Hatfield Moors. Overall, and unsurprisingly, this is rated as a high quality landscape. Thorne and Hatfield Moors are internationally designated nature sites. The landscape strategy is to conserve these special qualities.</p>	<p>The landscape strategy for G2 – 'Thorne and Hatfield Peat Moorlands is to Conserve' as set out in the Doncaster Landscape Character & Capacity Study, the Applicant notes there is no mention of special qualities.</p> <p>The landscape is not pristine nor conserved, the natural habitats of heath and mere have been drained, including the natural lines of rivers diverted. Peat has been extracted on an industrial scale particularly within the Moors, which has now ceased and habitats are being restored. As well as peat extraction the landscape has also been subject to sand and gravel extraction and mining. Major transport corridors cross the landscape often on raised banks which reduce tranquillity and include the M180, A18, the previously commercial waterway The Stainforth and Keadby Canal and the adjacent railway line. Ditches around the fields are maintained largely clear of vegetation with original hedgerows often having being denuded or removed. Much of the land is subject to large scale commercial farming with accompanying large scale buildings having been built around some of the farmsteads. Varied levels of vegetation encloses layers and punctuates the landscape from single trees and remnant hedgerow trees to groups, hedge lines shelterbelts and woodlands. Pylons and wind turbines are apparent in many views. There are former airfields used for storage, depots and large distribution areas.</p>

Consultee	Representation	Applicant's Response
		<p>Many of the farmsteads have become fragmented from the wider landholdings and are now subject to suburbanising 'horsiculture'.</p> <p>When considering these factors, on balance the sensitivity of the Order Limits is considered to be medium, as defined in the ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2]. ES Figure 6.4 Landscape and Visual Mitigation Strategy [Document Reference 6.4.6.4 Revision 2] conveys that much of the existing landscape features have been retained and respected, including the network of trees, hedgerows, woodlands and ditches and also enhances the Order Limits with new landscape features (trees, hedgerows, and tree blocks) throughout. As the landscape is not designated from a landscape perspective, there are no specific landscape qualities to preserve, other than those characteristics set out in published landscape character studies.</p> <p>Paragraph 6.3.10 of the ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2] confirms that the landscape assessment has been undertaken in accordance with the principles of best practice, as outlined in published guidance documents, notably the third edition of the Guidelines for Landscape and Visual Assessment (GLVIA3), (Landscape Institute and the Institute for Environmental Management and Assessment, 2013)'. The LVIA Assessment Criteria is set out in ES Appendix 6.1 [APP-061] which follows this guidance. ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2] considers National, Local and Order Limits level of landscape character, including reference to National Character Area 39: Humberhead Levels, along with relevant landscape character areas within the Landscape Character & Capacity Assessment of Doncaster Borough (March 2007) and the landscape character types within North Lincolnshire Landscape Character Assessment (September 1999). The Chapter uses these as the basis of its landscape assessment.</p>
	<p>6.6 CDC would also like to take the opportunity to reaffirm its commitment to engaging external advice on landscape and visual matters along with its willingness to positively engage with the Applicant in this respect.</p>	<p>The Applicant had a useful and constructive meeting with the Councils' landscape representatives from Tetratex on 11 March 2026 and welcomes further engagement with the Council on Landscape and Visual matters.</p>
	<p>7. Ecology and nature conservation (ES Chapter 7)</p>	<p>The Applicant agrees that any unmitigated construction works could have a major adverse impact and has therefore developed a</p>

Consultee	Representation	Applicant's Response
	<p><u>Skylark:</u></p> <p>7.1 The matter of significant effects on skylark population has been previously raised by CDC by requesting information on mitigation measures. The issue of the displacement of skylarks by solar farms has been the subject of a number of studies and reports. The article 'Blithe Spirit: Are Skylarks Being Overlooked in Impact Assessment?'¹⁴ provides some very specific advice on mitigation targeting for this species. The breeding bird survey has identified 269 skylark breeding territories over the 1830ha of the Order limits and this is a breeding density of 0.15territories /ha. Although this is a relatively low density compared to some habitats with a higher limit of holding 0.76 territories/ha, the Order limits does still hold a significant number of breeding skylarks. Given the skylark is on the International Union for Conservation of Nature Red List of Threatened Species (the IUCN Red List), as well as being Priority Species throughout the UK, the retention and persistence of the skylark population within the Order Limits is of significant importance. This is reiterated at paragraph 7.5.121 with the comment that the ground nesting bird assemblages including skylark are of National-Regional/County significance and as such any unmitigated construction works would have a major adverse impact.</p>	<p>mitigation strategy to mitigate construction impacts, including timing of works and pre-commencement checks, as detailed in the submitted documents including the ES Volume 2 Chapter 7: Ecology and Nature Conservation [AS-012] and the Outline Ecological Construction Management Plan [Document Reference 7.6 Revision 2].</p>
	<p>7.2 CDC considers that given the high number of skylark breeding territories some bespoke elements targeting the needs of skylarks should be included in all the 127ha of mitigation land for ground nesting birds. The "Fox Article" provides a mitigation metric based upon recent research into skylark breeding ecology, and this should be seriously considered in the finalisation of mitigation measures for ground nesting birds including skylark.</p>	<p>The Applicant agrees that bespoke elements targeting the needs of skylarks should be included in all the 127ha of mitigation land for ground nesting birds and this is included in the ES Volume 2 Chapter 7: Ecology and Nature Conservation [AS-012] and the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] which includes measures detailed in the 'The Fox Article'. However, as detailed in this article, there are limitations to the approach presented and the purpose of the article is to provide a starting point for discussion and is not an approved methodology for determining skylark mitigation: 'The prototype methodology given here is not perfect, makes several assumptions and is as yet without monitoring data. However, it is anticipated to provide a starting point for discussion on GNB mitigation.' (Fox. 2022).</p> <p>In addition to the above, the Applicant has also had regard to guidance from the RSPB, NE, and research by Donald 2004. As detailed in the 'Fox Article' the steady decline of the skylark population since the 1970s is mainly due to agricultural intensification and habitat loss. In addition to this, intensive farmland, which is the predominant habitat within the Order Limits, often provides a suitable nesting window only briefly, making only one or two skylark broods possible, and sometimes none. Therefore, the bespoke measures for skylark mitigation will include specific measures to ensure optimal habitat is provided for skylark that will assist with increasing the</p>

Consultee	Representation	Applicant's Response
		<p>carrying capacity of the habitats available. As detailed by Donald 2004 (referenced above), in optimal habitat, skylarks can have up to four broods per year. Therefore, although the overall habitat extent in area may decrease post-construction, the carrying capacity and habitat conditions will increase, potentially enabling an increase in successful breeding and broods.</p> <p>The bespoke mitigation measures include: sward height managed optimally for nesting skylark, at 20–50cm; the provision of skylark foraging plots to increase foraging opportunities; the provision of beetle banks to increase foraging opportunities; the use of species-rich neutral grassland to increase foraging opportunities within mitigation areas and around solar arrays; wide uncultivated margins to increase foraging, retention of winter stubbles to provide a longer nesting season and better winter foraging too.</p> <p>The Applicant also highlights that not all potential territories recorded during surveys are necessarily successful nesting skylarks, therefore, there are likely less nesting skylark within the Order Limits than territories recorded. As detailed in the 'Fox Article'4, 'singing is not a conclusive indicator of a viable nest.'</p> <p>The 'Fox Article' also states that skylark forage within solar farms and that it is possible that development sites with suitable grassland could provide 'nursery' habitat where nesting takes place on adjacent farmland and that if the carrying capacity of neighbouring habitat allows, some degree of 'absorption' of skylark territories into the surroundings is theoretically possible. Further to this, the article continues by stating that 'Where sites are in proximity to heaths, moorland or coastal grassland this may be more likely'. Heaths and moorland are located in proximity to the Order Limits and therefore provide further likelihood of absorption of territories in the wider area.</p> <p>The Applicant therefore considers that the proposed mitigation measures—comprising extensive areas of grassland within the mitigation areas managed specifically for skylarks, alongside areas of arable habitat—will substantially enhance nesting and foraging opportunities. These measures are expected to increase the carrying capacity of the available habitat and enable skylarks to raise three to four broods per year, compared with the one or two broods typically achieved under the current intensive arable land use. In addition, the habitats surrounding the solar arrays will provide further enhanced</p>

Consultee	Representation	Applicant's Response
		foraging opportunities compared to the existing situation, allowing some territories to be absorbed within the surrounding landscape.
	7.3 CDC also considers that as the GNB (ground nesting birds) mitigation areas should be subject monitoring over 30 years. As this will run concurrently with the monitoring of BNG on site habitat condition there could be some interpretation of any relationship between GNB and habitat condition.	The Applicant will include any interpretation of any relationship between GNB and habitat condition as part of the long term monitoring in the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] submitted at Deadline 1.
	7.4 Moreover, CDC cannot emphasise strongly enough that the features that contribute so strongly to the landscape qualities of this area, including across the entire Order limits within the CDC administrative boundary, directly contributes to the ecological importance in respect of skylarks too. These birds prefer stubble land, across large areas with few field boundaries. As such, the Order limits provide an important habitat for skylarks. The large expanses of solar panels would, in the view of CDC, create artificial field boundaries, with a wholly detrimental impact on this species.	<p>The Applicant agrees that the features that contribute strongly to the landscape qualities of this area, including across the entire Order limits and within the City of Doncaster Council administrative boundary, directly contributes to the ecological importance in respect of skylarks.</p> <p>The Applicant has designed the mitigation proposals with regards to the importance of the surrounding landscape and proposes measures that will increase foraging within the Order Limits. The mitigation measures proposed—comprising extensive areas of grassland within the mitigation areas managed specifically for skylarks, alongside areas of arable habitat—will substantially enhance nesting and foraging opportunities. These measures are expected to increase the carrying capacity of the available habitat and enable skylarks to raise three to four broods per year, compared with the one or two broods typically achieved under the current intensive arable land use.</p> <p>In addition, the habitats surrounding the solar arrays will provide further enhanced foraging opportunities compared to the existing situation, allowing some territories to be absorbed within the surrounding landscape.</p>
	7.5 It is not sufficient to state that compensatory habitat will be provided in terms of quantitative area to be given over for this purpose, that is an altogether too simplistic an approach and would ultimately result in a sub-optimal habitat. Instead, it is equally about the resultant quality of that replacement habitat. CDC remains to be satisfied that the functionality of any such replacement habitat is fit for purpose.	The Applicant agrees that that compensatory habitat for skylark is not only influenced by quantitative area, but also the quality of that replacement habitat. The Applicant considers that the Scheme delivers on both of these criteria. In quantitative terms, the proposals include the provision of 127ha of mitigation land for ground nesting birds, ensuring that sufficient habitat extent is maintained to support skylark territories. In terms of habitat quality, the mitigation areas will be specifically designed and managed to optimise conditions for skylark through the provision of suitable sward heights, skylark


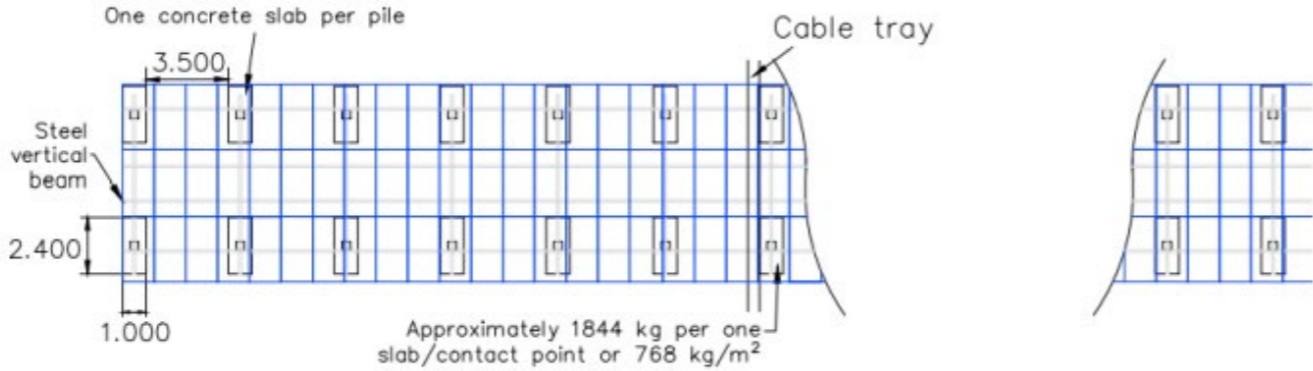
Consultee	Representation	Applicant's Response
		foraging plots, species-rich neutral grassland, wide uncultivated margins and the retention of winter stubbles. These measures are intended to increase the availability of nesting and foraging habitat and improve the carrying capacity of the landscape for skylark compared to the existing intensive arable land use, as set out above in response to paragraph 7.2.
	7.6 Ultimately, the ecological value in this habitat is derived through lack of disturbance and activity, which results in this tranquil, isolated place, the value of which in so many respects is being underestimated by the Applicants.	The Applicant agrees that the ecological value of habitat for skylark is derived through lack of disturbance and activity, and mitigation areas have been provided without public access to ensure that this remains. In addition, measures are proposed throughout construction to prevent impacts from disturbance during that phase, as detailed in the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] . These measures include, for example, the timing of construction works to avoid the breeding bird season where practicable, the implementation of pre-commencement checks for nesting birds, and the establishment of protective buffers where active nests are identified. The mitigation areas themselves will be managed to maintain suitable nesting and foraging conditions for skylark whilst limiting disturbance through the exclusion of public access and minimising unnecessary operational activity.
	<p><u>Nightjar:</u></p> <p>7.7 Information on the management of lighting in respect of this priority/qualifying species has previously been requested. The Applicant response to this is that details of the assessment of recent data gathering through literature reviews will provide a full coverage of the potential impact pathway of lighting. CDC considers that this is a satisfactory response.</p> <p><u>Invertebrates:</u></p> <p>7.8 An assessment of likely significant effects is provided at Section 7.5 of the ES, and this provides sufficient information.</p> <p><u>Water Quality:</u></p> <p>7.9 This is fully considered in the ES in various sections throughout the document. It is considered that the cessation of agricultural inputs and physical disturbance from ploughing and harrowing will have a beneficial impact on water quality and this is accepted.</p>	The Applicant agrees with Council's position at paragraphs 7.7 to 7.9.

Consultee	Representation	Applicant's Response
	<p><u>Reptiles:</u></p> <p>7.10 Further reptile surveys are still required. CDC's experience of developments in the area show that it is important to take reptiles into account and surveys are necessary. The Order Limits are very extensive, and we do not consider that it is possible to safely scope out reptile surveys from every potential area of supporting habitat. Records of reptiles from the Doncaster LRC are supplied in many cases with notes of location specifics and many basking reptiles are found on artificial substrates and man-made surfaces and dead vegetation</p> <p>7.11 Thorne Moors is noted for its reptile population (Local Record Centre 'LRC' records) and it is at least necessary to have some strategy based upon the proximity of sensitive and habitat rich locations rather than scope out the whole of the Order Limit area. We consider that some further survey effort should have been located in areas adjacent to the two SAC/SPA areas.</p>	<p>The majority of the Order Limits comprises arable farmland that is unsuitable to support reptile species. The ES addresses the potential for impacts on reptiles based on habitat survey and suitability appraisal and an understanding of the lifecycle requirements of reptile species. Based on these findings, the Applicant does not consider reptile surveys are required.</p> <p>As habitats of higher value to reptile species will be protected and retained as part of The Scheme, the Applicant does not consider that further specific surveys are required and that it is reasonable to scope out the potential for significant adverse effects on local reptile populations and address the safeguarding of individuals potentially present, within the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2].</p> <p>Further to this, mitigation area M1(A) provides a large buffer to the adjacent SPA/SAC in this area, and the Order Limits is also separated by a road from this location. In addition, a road is present and separates the Order Limits from the SPA/SAC and parcels A3, A5 and A7. These land parcels also comprise arable and are not suitable reptile habitat. Therefore, no impacts to reptiles using the SPA/SAC are likely in these locations.</p> <p>Parcel A19 is adjacent to the SPA/SAC, although is to be buffered by approximately 10m, reducing any likely impacts to reptiles.</p> <p>It is also important to note the legal protection afforded to most common reptiles (apart from smooth snake and sand lizard which are not present in this part of the U.K). Native reptiles are protected under the Wildlife and Countryside Act 1981 and it is an offence to intentionally kill or injure them, possess or transport them (or any part, alive or dead), sell, offer, or publish an advert to sell. Therefore, although the animals are protected, their habitat is not, and a suitable mitigation strategy to ensure no harm takes place during construction, will ensure that relevant legislation is complied with.</p>
	<p><u>Amphibians:</u></p> <p>7.12 The potential for amphibians and specifically eDNA surveys are considered at 7.4.72 -7.4.77 of ES Chapter 7. All water bodies sampled for GCN through eDNA sampling gave negative results.</p>	<p>The Applicant agrees that the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] provides sufficient protection through the construction phase for amphibians.</p>

Consultee	Representation	Applicant's Response
	<p>The overall assessment is that the proposed eCMP will provide sufficient protection through the construction phase and this is accepted.</p>	
	<p><u>Mammal Connectivity:</u></p> <p>7.13 It is accepted that the mammal gates to be adopted will be appropriate and suitable to ensure the uninterrupted passage of terrestrial mammals. There should also be a monitoring protocol produced to ensure that such mammal gates are functioning and are in the correct location coinciding with established terrestrial mammal movements. This will also cover deer. There is a significant roe deer population in the area, identified as a Local Biodiversity Action Plan15 species.</p>	<p>The Applicant agrees that the mammal gates to be adopted will be appropriate and suitable to ensure the uninterrupted passage of terrestrial mammals and that a monitoring protocol can be produced to ensure that such mammal gates are functioning and are in the correct location coinciding with established terrestrial mammal movements in the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] submitted at Deadline 1.</p>
	<p><u>Hibernacula</u></p> <p>7.14 The proposals as identified in the LEMP are acceptable and there is no monitoring requirement.</p>	<p>The Applicant agrees that the proposals as identified in the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] are acceptable and there is no monitoring requirement for hibernacula.</p>
	<p><u>Peat & carbon sequestration:</u></p> <p>7.15 It is understood that a Phase 2 Geotechnical & Geoenvironmental Investigation (secured via the CEMP) will include drilling/auguring within each land parcel to accurately calculate the extent of peat across the scheme. From this geological data, assessments of carbon sequestering should be undertaken.</p> <p>7.16 CDC will comment on the results of these investigations but would also draw attention to the comments made in the "Agricultural Land" section of this Relevant Representation. Furthermore, CDC would take the opportunity to reiterate that the very foundation of the environmental and ecological importance of this site is that it is peat land. This importance cannot be underestimated, and CDC considers at present the Applicant is persistently doing so.</p>	<p>The Applicant confirms that a programme of ground investigations will take place across the site. Specific consideration will be given during the scoping, delivery and technical interpretation of these investigative works to potential impacts of the Scheme on carbon sequestering within peat soils. Geo-environmental investigations are referenced within section 4.14 of the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2]. Geo-environmental investigations will be presented as part of a submission of a Final CEMP, secured by Requirement 14 of the Draft DCO [Document Reference 3.1 Revision 3].</p> <p>The Applicant is aware of and committed to completing various ecological, soil and environmental impact assessments that will consider and advise mitigation measures to ensure any impact on peat lands during and following on from completion of the development are minimised to as low as reasonable and practicable.</p>
	<p><u>Importance of open areas for wintering birds</u></p> <p>7.17 This is being addressed following the updating of non-breeding bird surveys and the interpretation of these results as areas included in the mitigation proposals This will be contained within an updated version of the Non-Breeding Bird Mitigation Strategy. CDC would welcome the</p>	<p>The Applicant agrees that further engagement with City of Doncaster Council regarding wintering birds would be beneficial and has made contact to arrange this.</p>

Consultee	Representation	Applicant's Response
	<p>opportunity to engage on this at the earliest point given that it has not had the benefit of meaningful engagement with the Applicant in this respect to date.</p>	
	<p><u>Habitat enhancements</u></p> <p>7.18 These will be part of the BNG post development proposals and also be a part of the LEMP where functional ecological enhancements can be detailed</p>	<p>The Applicant agrees with this position.</p>
	<p><u>Biodiversity net gain:</u></p> <p>7.19 ES Appendix 7.12: Biodiversity Net Gain [APP-082] sets out as follows:</p> <p>As described within The Statutory Biodiversity Metric 16413_MO1a and summarised below in Figure 4.1, based on the habitats present that will be lost and those to be created, the development would result in a gain of 3727.44 habitat units, a gain of 345.56 hedgerow units, and a gain of 100.43 watercourse units. This is a percentage gain of 79.82% in habitat units, 178.57% in hedgerow units and 10.84% in watercourse units.</p> <p>The DEFRA Statutory Biodiversity Metric has demonstrated that the Scheme will achieve a net gain in biodiversity units exceeding 10% across the Order Limits, even when applying a precautionary baseline approach. This demonstrates the deliverability of measurable biodiversity improvements in line with the Applicant's commitments under the NERC Act and relevant national policy, despite the Scheme not being subject to mandatory BNG requirements.</p> <p>7.20 However, it is noted that Requirement 8 as set out in the Draft Development Consent Order [APP- 016] states:</p> <p>(3) The landscape and ecological management plan for the relevant phase must include details of:</p> <p>(a) the extent to which the relevant phase contributes to ensuring that the authorised development overall achieves a minimum of 10% biodiversity net gain during its operational lifetime using the statutory biodiversity metric published by the Department of Environment, Food and Rural Affairs on 12 February 2024 to calculate those percentages.</p> <p>7.21 This position is unacceptable in the Council's view, and it is understood that Examining Authorities are pressing Applicants for further commitment to enshrine both bold and actual percentage gains across various habitat types (i.e. water courses, hedgerows, grassland etc.) within the DCO Requirements. Given that this is a benefit the applicant seeks to rely upon in the overall balance, CDC considers this should be the case here.</p>	<p>The Applicant considers that the BNG assessment detailed in ES Appendix 7.12: Biodiversity Net Gain Assessment [APP-082] clearly demonstrates that measurable gains in biodiversity are being created within the Order limits, despite BNG not being mandatory for NSIPs. This is confirmed by Natural England within their Relevant Representation, in which they state: <i>'Natural England welcome the commitment to delivering Biodiversity Net Gain (BNG) on this project. We recommend that the target increase in BNG of at least 10% across all biodiversity unit types is secured via the Landscape and Ecological Management Plan (LEMP). Please note that BNG is not yet mandatory for NSIPs and Defra's guidance on provision of BNG for NSIPs has not yet been published; therefore, our advice may be subject to change once this is available'</i>. To be clear, as set out in para 6.6.18 of the Planning Statement [APP-030], whilst the provisions relating to BNG for NSIPs are not currently in force, it is expected that the biodiversity gain statement to be introduced to the Planning Act 2008 (via Schedule 15 to the Environment Act 2021) will specify a requirement for new NSIPs to provide a minimum 10% BNG. The drafting of Requirement 8 of the Draft DCO [Document Reference 3.1 Revision 3] is reflective of this. Accordingly, the Applicant does not consider that it is necessary to go further by providing actual percentage gains across habitat types.</p> <p>With reference to paragraph 7.24, the Applicant has provided the BNG metric to City of Doncaster Council.</p> <p>With reference to paragraph 7.25, the Applicant can confirm that land-use has changed over time within the Order Limits, and that this was taken into consideration during the completion of the BNG calculations.</p> <p>With reference to paragraph 7.26, the Applicant can confirm that land-use has changed over time at the Order Limits, and that this was</p>

Consultee	Representation	Applicant's Response
	<p>7.22 In terms of the detailed methodology and gains cited, CDC reserves its position to provide more detailed commentary in the Local Impact Report but at this stage can provide the following observations and comments:</p> <p>7.23 It is not difficult to provide demonstrable BNG gains in circumstances such as this, where arable land is upgraded to neutral grassland over >1,000 ha. The benefits in this respect should be bold and maximised, as set out above.</p> <p>7.24 At 1.6 it states that the DEFRA Statutory Metric Calculator has been utilised, but this cannot be found. There is a screenshot of the Final Results page showing a 79.82% increase in biodiversity, but the Statutory Metric should be available in full for proper scrutiny.</p> <p>7.25 In respect of Figure 1: 16413_P13_Habitat Features_JS_RR of the Biodiversity Net Gain Assessment [APP-O82], it is assumed that this is the BNG habitat baseline and if so, it should be labelled as such. Recent evidence from site visits by CDC officers have identified that areas indicated as 'other neutral grassland' have now been cultivated but it is assumed that the habitat baseline will have a survey date baseline. The BNG assessment should include information on habitat parcel identification so that proposed retention, loss or enhancement can be related to size, location and relative value of a particular parcel.</p> <p>7.26 There are also some discrepancies between certain plots in the Habitat Map provided in Appendix 7.1 Baseline Habitats Report [APP-O72]. One field adjacent to High Bridge Road (Grid ref centre SE 71457 12179) is shown in August 2023 as cereal crop, in August 2025 it is 'other neutral grassland' and in December 2025 it is cultivated unvegetated land/bare ground unsealed surface.</p> <p>7.27 At 3.10 it is stated that the vegetation to be established below the solar panels would be neutral grassland as opposed to the recommended classification from UKHabs of using Solar Panel with Vegetation ulb6 (other developed land) and "on a precautionary basis the target condition would be poor." We would strongly contend that this be amended to reflect the recommended ulb6. This will be an important factor as if certain heavily shaded areas fail to establish as targeted in the BNG proposals this would amount to a failing in BNG target habitat and condition. It can be seen from the screenshot taken from the BRE/NFU joint publication Good Practice Guidance for Solar Farms¹⁶ below, that unvegetated areas do occur under solar panels. This may not be a large area for each panel >0.25m² and may not compromise grazing efficiency but where there is the quantitative measurement of post development habitats these unvegetated areas under a large number of panels can add up to a significant area. Alternatively, such 'unvegetated' areas could remain as grassland.</p>	<p>taken into consideration during the completion of the BNG calculations.</p> <p>With reference to paragraph 7.29, the Applicant confirms that within the Biodiversity Metric, the vegetation beneath the panels has been classified as neutral grassland in poor condition. This approach was adopted on a precautionary basis to reflect the potential influence of shading, maintenance access and panel infrastructure on vegetation composition and structure.</p> <p>The Applicant acknowledges the forthcoming Clarkson-Woods publication referenced by LWT in their Relevant Representation and the potential development of a specialist UKHab secondary code for vegetation beneath solar panels. As this clarification is not yet formally adopted within the UKHab classification or the Statutory Biodiversity Metric guidance, the current assessment has applied the most appropriate existing habitat classification within the metric framework.</p> <p>The approach taken is considered precautionary, as areas of grassland beneath solar panels will be established using a species-rich neutral grassland seed mix and managed through grazing or mowing. While some areas may achieve a higher condition over time, the Biodiversity Metric assessment conservatively assumes poor condition to avoid overestimating biodiversity gains.</p> <p>The Applicant confirms that the proposed solar panels will have a minimum clearance of 0.8m above ground level, with panel heights increasing to a maximum of approximately 2.3m for fixed panels (or up to 2.5m for tracker panels where required for flood clearance) as detailed in Appendix A –Parameters Document [Document Reference 5.6.1 Revision 3]. As such, only a limited proportion of each panel array will be at the lowest clearance. On this basis, shading is not considered to preclude the establishment or management of grassland habitat within the fenced area.</p> <p>The Applicant further notes that the Biodiversity Metric condition assessment criteria for neutral grassland allows for up to 5% bare ground within this grassland habitat and it is not expected that there will be 5% bare ground across the grassland areas, thereby providing</p>

Consultee	Representation	Applicant's Response
	 <p data-bbox="409 730 1403 884"> Wyld Meadow Farm, Bridport </p> <p data-bbox="409 930 1754 1119"> 7.28 The proposals for the 'below the panel' habitat type does not consider the use of concrete support slabs referred to as 'ballast'. These are shown in Plan 2.9, Figure 2.9: Indicative Layout and Cross Section Plan Showing ref: Typical 3P Fixed Table (Ballasted) [APP-015]. These concrete slabs are 2.4m² and are set at 1 per 'pile or 10 for every 54 panels. A screenshot of this arrangement is shown below. </p> <div data-bbox="424 1213 1650 1633" style="text-align: center;"> <p>Birdseye view – 3 modules in portrait</p>  </div> <p data-bbox="409 1696 1724 1770"> 7.29 If this is to be the case that concrete slabs are used throughout the solar panel areas, then this should be included in the Biodiversity Net Gain report. </p>	<p data-bbox="1777 233 2650 306"> further certainty that the BNG calculations provided enable an accurate assessment of the BNG conditions to be achieved. </p> <p data-bbox="1777 348 2742 590"> The Applicant also notes that City of Doncaster Council confirm within their section 7.27 that the areas underneath panels can remain as grassland within the metric, by stating that "such 'unvegetated' areas could remain as grassland.' Therefore, it is considered that the approach undertaken by the Applicant with the BNG habitat classifications confirms with this requirement. </p> <p data-bbox="1777 632 2689 737"> The Applicant will continue to monitor developments in national guidance relating to the classification of vegetation beneath solar panels. </p>

Consultee	Representation	Applicant's Response
	<p>8. Cultural Heritage and archaeology (ES Chapter 8)</p> <p><u>Historic landscape:</u></p> <p>8.1 The importance of the landscape comprising the Order limits and beyond in heritage terms has, in the view of CDC, been significantly downplayed by the Applicant in its assessments. Understanding the local distinctiveness of the land within the Order limits is key in this respect and this has not been properly considered.</p>	<p>The historic landscape within the ES Volume 2 Chapter 8: Cultural Heritage and Archaeology [APP-045] has considered the identified elements of the historic landscape (such as Thorne Moor and Hatfield Moor) as non-designated heritage assets. Similar comments from North Lincolnshire were also actioned with regard to the Isle of Axholme. No comments have been received from City of Doncaster Council with regard to concerns over the consideration of the wider "Vermuyden reclaimed landscape" – this is not considered to be a heritage asset in its own right and is not identified on any database as such. The comment from City of Doncaster Council to provide a more detailed consideration of the implications of the Scheme upon Thorne Conservation Area were addressed in the ES Technical Appendix 8.1: Heritage Baseline [APP-085]</p>
	<p>8.2 Much of what gives this landscape its distinctiveness is tied to its historic context, in particular the fact that it is reclaimed land by the drainage scheme implemented by Cornelius Vermuyden (1595–1677), a Dutch engineer commissioned by King Charles I to drain vast areas of wetlands in England, including Hatfield Chase and the Fens of East Anglia. His work in the 17th century involved cutting canals (like the Old and New Bedford Rivers), redirecting rivers (e.g., the River Don became the "Dutch River"), and constructing embankments, transforming wild marshlands into fertile farmland. These engineering works are some of the largest man-made landscape features in England and his influence is still seen across the landscape comprising the Order limits and beyond. The resultant strips of land are usually long slivers separated by drainage channels running at the side of field boundaries. Historically, this attracted a type of farming which involved many small-scale farmers cultivating these small areas /fields of land not always contiguous.</p>	<p>Vermuyden's drainage work has been altered and developed in the later post-medieval period including through later drainage works, the construction of the Stainforth and Keadby Canal, Inclosure of Common fields and the areas of 19th century warp draining that lie within the Order Limits. Some of the larger dykes within the north-western part of the scheme are as recent as the mid 20th-century. The evolution of the post-medieval landscape is recorded in paragraphs 5.125–5.138 and Plates 8–13 of the ES Technical Appendix 8.1: Heritage Baseline [APP-085].</p>
	<p>8.3 This physical legacy creates a clear local distinctiveness across the landscape of small parcels /fields separated by drainage channels. Whilst there has been a trend in modern times for the amalgamation of fields, it is impossible to erase the local distinctiveness here because of the dykes, ditches and drains which define the small parcels of land. In historic terms, this also has an important wider bearing on the significance of Doncaster as an agricultural centre of major influence.</p>	<p>The Applicant notes that the Scheme will not erase or alter any of the historic dykes and the field pattern will remain legible. Whilst the temporary introduction of solar arrays will alter the agricultural character of the Order Limits for the duration of the scheme it will be returned following the conclusion of decommissioning. The form of the landscape will not experience change nor will the ability to understand the local distinctiveness caused by the drainage of this area.</p>
	<p>8.4 CDC also considers that there is also potential for the proposed development to give rise to noise impacts that could adversely affect the distinctiveness of the area. An important characteristic associated with the isolation and remoteness of this location is the limited noise intrusion experienced here. Changes to this will undoubtedly affect the enjoyment of the</p>	<p>This comment does not refer to any specific heritage asset.</p> <p>The Applicant notes that the study area for built heritage assets was agreed within the Planning Inspectorate's EIA Scoping Opinion,</p>

Consultee	Representation	Applicant's Response
	<p>distinctive area for both residents and others seeking to enjoy its special qualities such as users of the public rights of way.</p>	<p>presented at ES Technical Appendix 1.1 [APP-057] and at paragraph 8.1.3 of the ES Volume 2 Chapter 8: Cultural Heritage and Archaeology [APP-045].</p> <p>It is noted that that City of Doncaster Council did not comment on heritage matters as part of their scoping consultee response. This extensive study area allowed for the identification of long distance views and intervisibility that contribute to significance.</p> <p>The Applicant disagrees with the suggestion that significance has been limited to the fabric of the buildings. The Heritage Baseline Assessment [APP-085] set out what elements of the asset contribute to the significance within the descriptions and it is clear that the reason for the designation or identification as non-designated assets in question in this assessment is primarily the physical fabric of the asset. There is no suggestion that setting makes no contribution but rather the contribution the setting makes proportionately has been set out.</p> <p>The ES Technical Appendix 8.1: Heritage Baseline [APP-085] and ES Volume 2 Chapter 8: Cultural Heritage and Archaeology [APP-045] have specifically considered the setting and intervisibility of the built assets within the wider landscape. The introduction of solar arrays will not affect the ability of people within the landscape to understand the openness and expansiveness associated with dispersed farmsteads.</p>
	<p><u>Setting of above ground heritage assets:</u></p> <p>8.5 The special interest of the heritage assets in the area must be understood as the way which they interact with the local distinctiveness of the Vermuyden "won land", as described above, and through proper recognition that the dispersed and isolated nature of the farm houses, as indicated by the long views, is an important contribution to local distinctiveness much more than just the physical attributes of the buildings and fabric which has been the focus of the Applicant's assessment (erroneously in the view of CDC). It is, in fact, quite wrong to suggest that heritage interest is mainly limited to the fabric of the building. Proper and thorough consideration of local distinctiveness, making use of earlier land character studies as a fundamental starting point would assist in a wider, more holistic, and altogether more appropriate, approach to the analysis. CDC would welcome the opportunity to discuss these studies with the Applicant to further assist their understanding of the landscape which, unfortunately, is demonstrably lacking at present.</p>	<p>The Applicant notes that the study area for built heritage assets was agreed within the Planning Inspectorate's EIA Scoping Opinion, presented at ES Technical Appendix 1.1 [APP-057] and at paragraph 8.1.3 of the ES Chapter 8: Cultural Heritage and Archaeology [APP-045]. It is noted that that City of Doncaster Council did not comment on heritage matters as part of their scoping consultee response. This extensive study area allowed for the identification of long distance views and intervisibility that contribute to significance.</p> <p>The Applicant disagrees with the suggestion that significance has been limited to the fabric of the buildings. The Heritage Baseline Assessment [APP-085] set out what elements of the asset contribute to the significance within the descriptions and it is clear that the reason for the designation or identification as non-designated assets in question in this assessment is primarily the</p>

Consultee	Representation	Applicant's Response
		<p>physical fabric of the asset. There is no suggestion that setting makes no contribution but rather the contribution the setting makes proportionately has been set out.</p> <p>The ES Technical Appendix 8.1: Heritage Baseline [APP-085] and ES Chapter 8: Cultural Heritage and Archaeology [APP-045] have specifically considered the setting and intervisibility of the built assets within the wider landscape.</p> <p>The temporary introduction of solar arrays will not affect the ability of people within the landscape to understand the openness and expansiveness associated with dispersed farmsteads.</p>
	<p>8.6 Within the CDC administrative area, it is worth noting that the landscape character is one of dispersed rural farms and cottages but unlike parts in North Lincolnshire the A18 from Tudworth to the border with Lincolnshire is not particularly elevated above the surrounding land and the road follows the natural undulations of the surrounding land. Consequently, the A18 does not provide a significant physical barrier to views and therefore the sense of vast openness between the isolated farmsteads is more pronounced than corresponding views across the A18 in Lincolnshire, where the road appears to have been raised and the margins next to the roadside have been planted between Dirtness and Double Rivers where the A161 crosses the A18.</p>	<p>The Applicant notes the comments on paragraph 8.6.</p>
	<p>8.7 The ES makes specific mention of Sand Hill Farm which is set back from the A18 and to the North East of High Levels where the Black Bull Public house is located amongst a small, nucleated settlement on an intersection of the A18. Various descriptive analysis has been made about the significance and setting of Sand Hill Farm; a Grade II listed building.</p>	<p>The Applicant notes the comment on paragraph 8.7</p>
	<p>8.8 The ES suggests that the setting of this listed building is limited particularly in the views to the north of the farmhouse and therefore the impact of the solar farm is not particularly restrictive on the setting associated with the listed building. Whilst it is accepted that tree planting around the site provides some softening of the open landscape, there remains a very clear sense of openness and isolation here. Without doubt, losing this through the proposed development would harm the setting of the listed building.</p>	<p>The Applicant has noted at paragraphs 8.6.67; 8.6.80; and 8.6.93 of the ES Chapter 8: Cultural Heritage and Archaeology [APP-045] and in more detail at paragraphs 6.22–6.33 of the ES Appendix 8.1 Heritage Baseline Assessment [APP-085] that there will be temporary less than substantial harm to the significance of the farmhouse through changes to its rural setting and views arising from the introduction of solar arrays..</p>
	<p>8.9 In fact, Sand Hill Farm remains very visible from the track/access road (Jacques Bank), much further to the east, going over Dirtness Levels to Medge Hall and the canal. Views across the fields in Lincolnshire towards Sand Hill Farm take in the edges of fields in the slightly undulating landscape. Furthermore, long distance views looking north to the wind farm at Tween Bridge from Jacques Bank, Green Bank, Clay Bank Road and Double Bridges Road give an overriding</p>	<p>An assessment of Sandhill Farmhouse is presented within paragraph 6.22 to 6.33 of the ES Appendix 8.1 Heritage Baseline Assessment [APP-085]. The very distant intervisibility of the eastern elevation of Sandhill Farmhouse is acknowledged but it is surrounded by a substantial buffer of agricultural land and the temporary introduction of solar arrays will not affect the ability of people within the landscape</p>

Consultee	Representation	Applicant's Response
	<p>impression of isolated openness as the wind farm in distant views provides a bookend for these views over the distinctive generally flat countryside.</p>	<p>to understand the openness and expansiveness with dispersed farmsteads.</p>
	<p>8.10 The flat open countryside with limited hedging along the small field boundaries which are mainly formed with open ditches form part of the local distinctiveness of the Vermuyden won landscape. The tree planting which has taken place around the isolated farmhouses such as Sand Hill Farm and Red House Farm emphasise the remoteness and openness of the area particularly with the benefit of long distant views.</p>	<p>From the map regression undertaken as part of ES Appendix 8.1, Heritage Baseline Assessment [APP-085] it is clear that there have been hedges within the landscape for a considerable period. The hedges immediately surrounding Sandhill Farm, for example, were recorded as being more extensive on the 1893 OS Map than at the present day which clearly supports the limited reintroduction of some hedges within the landscape. Historic mapping can be found within the ES Appendix 9.1 Phase 1 Ground Conditions Desk Study Reports for Land Parcels A-E part 2 [APP-098].</p>
	<p>8.11 The reference within the ES to the sparseness of hedges on field boundaries disingenuously implies the quality of the landscape is lacking in some form. Moreover, to infer from this that the proposed planting scheme provides some improvement to the landscape over and above the need to screen the proposed development fundamentally fails to recognise that the lack of hedged field boundaries is a key contributory aspect to the local distinctiveness of the area. In fact, hedges would serve to irrevocably change this important character. As such, the proposed planting to mitigate the impacts of the development would, in and of itself, cause harm in historic landscape terms.</p> <p>8.12 In this respect, CDC would also question how the existing historic watercourses could be properly managed and maintained with such planting in situ.</p>	<p>The Applicant disagrees with the suggestion that its reference to hedgerows makes value judgement regarding the landscape and its quality, those references merely highlights the fact that there are some sparse and gappy hedges within the Order Limits and wider landscape.</p> <p>As noted at paragraph 8.7.4 of the ES Chapter 8: Cultural Heritage and Archaeology [APP-045] hedge planting forms only part of the proposed scheme of mitigation with offsets to retain suitable margins around/or views from the assets to minimise the adverse effects also embedded within the design.</p> <p>The Outline Operational Environmental Management Plan [APP-177] sets out management principles for the ditches and watercourses during the operational lifetime of the development</p>
	<p>Archaeology:</p> <p>8.13 South Yorkshire Archaeology Service (SYAS) is a joint service of the local authorities of Barnsley Metropolitan Borough Council, City of Doncaster Council, Rotherham Metropolitan Borough Council and Sheffield City Council, set up and maintained by those authorities to provide each with archaeological advice. CDC has taken advice from SYAS in compiling this Relevant Representation, and this is provided in full below.</p> <p>8.14 Cultural heritage and archaeology is considered in Chapter 8 of the Environmental Statement [APP-045] (ENO10148-000261-6.2.8 ES Ch 8 Cultural Heritage and Archaeology) and is supported by technical appendices consisting of a Heritage Technical Baseline (ENO10148-000346-6.3.8.1 Heritage Baseline Assessment) [APP-085], a geophysical survey (ENO10148-000(347-353)-6.3.8.2 Geophysical Survey Report Parts 1-7) [APP-086 – 092], a</p>	<p>The Applicant notes comments on paragraphs 8.13 to 8.15.</p>

Consultee	Representation	Applicant's Response
	<p>Geoarchaeological Desk-based Assessment (ENO10148-000356-6.3.8.3 Geoarchaeological Assessment) [APP-093], a Trial Trenching report (ENO10148-000357-6.3.8.4 Trial Trenching Report) (North Lincolnshire only) [APP-094] and a test pitting report (ENO10148-000358-6.3.8.5 Test Pitting Report) (South Yorkshire only) [APP-095]. An Outline Archaeological Mitigation Strategy (ENO10148-000359-6.3.8.6 Outline Archaeological Strategy) [APPO96] has also been submitted.</p> <p>8.15 The site is bordered by Thorne Moors to the north and Hatfield Moors to the south and would have been part of this fenland moor landscape prior to the drainage works initiated in the 17th century. This has had a bearing on the character of archaeological potential within the site with the nature of the archaeological resource likely to be represented by lithic scatters of Mesolithic, Neolithic & Bronze Age date (c.10,000-1,000 years ago), features dating to the 17th century or later and paleoenvironmental evidence largely within former river channels or deposits of peat.</p>	
	<p>8.16 This leads on to the main area of disagreement – the type and timing of archaeological evaluation techniques employed. The disagreement is recognised by the applicants in their Potential Main Issues for Examination report (ENO10148-000240-5.9 Potential Main Issues for Examination) [APPO36]. Items HER-02 and HER-03 concern archaeological fieldwork techniques and their timing (field-walking and trial trenching respectively). Archaeological research should be an iterative process with the results of one piece of work feeding into the design of the next. Fieldwalking is a broad brush evaluation technique aimed at identifying areas of archaeological interest across large areas. Trial trenching characterises deposits and archaeological activity at a particular location. Fieldwalking is the more suitable technique for identifying lithic scatters within this site and, as such, SYAS advised it should be undertaken before any trial trenching so that the results could inform the location of the trenches or other technique. The Applicant's position is that fieldwalking is unsuitable due to a lack of ploughed fields, so SYAS agreed a targeted programme of test-pitting to assess some areas of archaeological potential. SYAS were unable to discuss the results, or any follow up work as they were never informed that the test-pitting had been undertaken or sent the report. That report has now been submitted by the applicant (ENO10148- 000358-6.3.8.5 Test Pitting Report) [APP-095] and the results were largely negative. However, 440 test pits, measuring 0.40m x 0.40m, are not sufficient to characterise the entire archaeological potential of such a large site.</p> <p>8.17 The applicants recognise this and have submitted an Outline Archaeological Mitigation Strategy (oAMS) [APP-096] that details further work proposed. One of the specific objectives of this report is:</p> <p>"To determine whether any of the potential archaeological remains identified within the site will be impacted by the proposed development and, if so, the nature of these;"</p>	<p>The research undertaken with regard to the historic environment has been an iterative process. The results are detailed in the ES Technical Appendix 8.1, Heritage Baseline Assessment [APP-085]. Initially, desk-based research was undertaken which was informed by: HER data, archival sources; historic cartographic sources; Site walkover; Aerial photograph analysis; LiDAR analysis; and Review of previous archaeological assessments. Further to this, due to the acknowledged geoarchaeological potential of the Order Limits a specialist assessment was commissioned and its findings used to revise the heritage assessment ES Technical Appendix 8.3 Geoarchaeological Assessment [APP-093]. Further evaluation has been undertaken in the form of a geophysical survey of the entire Order Limits. The anomalies identified were also then considered as possible archaeological assets within the assessment. This has been revised on several occasions as a result of the evolving Order Limits to ensure complete survey coverage. The results are detailed in ES Technical Appendix 8.2 Geophysical Survey Report [APP-086 – APP-092]</p> <p>The presence of prehistoric archaeological potential was identified at an early stage and the feasibility of undertaking fieldwalking was assessed in both 2023 and 2024. Due to the prevailing agricultural regimes within the Order Limits most of the land was found to be either direct drill arable or pasture which due to the lack of ground disturbance severely limit the efficacy of fieldwalking as an evaluative technique. Engagement with SYAS regarding this issue resulted in agreement to target areas of identified prehistoric potential with shovel test-pitting to provide additional understanding of these areas.</p>

Consultee	Representation	Applicant's Response
	<p>EN010148-000359-6.3.8.6 Outline Archaeological Strategy: para 4.2 (1)</p>	<p>The results are detailed in the ES Technical Appendix 8.5 Test Pitting Report [APP-095]. SYAS were provided the WSI for test-pitting on 14 May 2025 and the proposed start date was delayed following communications from SYAS to allow them sufficient time to review and comment on the proposal. However, SYAS had been advised that the proposed short notice was necessary to allow time for the results to be circulated and discussed pre-submission against the backdrop of application submission date. The increased time afforded ensured that SYAS were content to approve the scheme of works proposed but did not allow time for the results to be discussed pre-submission.</p> <p>This test pitting is not a replacement for fieldwalking but rather an additional piece of work to provide information until such time as fieldwalking would be possible to undertake with the potential for meaningful results to be achieved. It should be noted that trial trenching has been completed within targeted areas of the Order Limits, in North Lincolnshire, where this evaluation technique would be the most effective and where archaeological potential was such that it needed to be further investigated to inform the scheme design, as set out in the ES Technical Appendix 8.4 Trial Trenching Report [APP-094]. It is the case that a full suite of evaluation has taken place to inform the assessment of the Scheme.</p>
	<p>8.18 This archaeological mitigation strategy is actually an archaeological evaluation and mitigation strategy that the applicants propose should be undertaken postconsent. However, determining the impact of a proposed development upon potential archaeological remains is something that needs to be understood prior to determination so that appropriate planning weight can be afforded. To not do so could lead to harm to archaeological remains or inappropriate mitigation post-consent. Perhaps a useful compromise would be to evaluate the areas of high impact construction activities such as below ground cable routes, directional drilling access pits, temporary compounds, BESS and substations at this stage so that any issues could be addressed in a more timely fashion.</p>	<p>The approach to assessing potential impacts to the archaeological resource within ES Volume 2 Chapter 8: Cultural Heritage and Archaeology [APP-045] has been precautionary with a worst case scenario employed to ensure adverse effects are clearly articulated and due weight given to these.</p> <p>The exact routes and construction details for the higher impact elements of the Scheme would be developed as part of the detailed design of the Scheme and secured by requirement, notably requirement 6. The Applicant is confident that any potential evaluation or mitigation required within these areas can be delivered in a timely fashion post-consent.</p>
	<p>8.19 Where the oAMS specifies mitigation measures rather than evaluation techniques, SYAS is broadly in agreement with the proposals. Micro-siting should be added to the options specified in paragraph 5.10 as another method of avoiding archaeological impacts. As we were not given</p>	<p>The Applicant acknowledges the broad agreement.</p> <p>The Applicant is happy to consider the comments provided and would be happy to engage on the ES Technical Appendix 8.6 Outline</p>

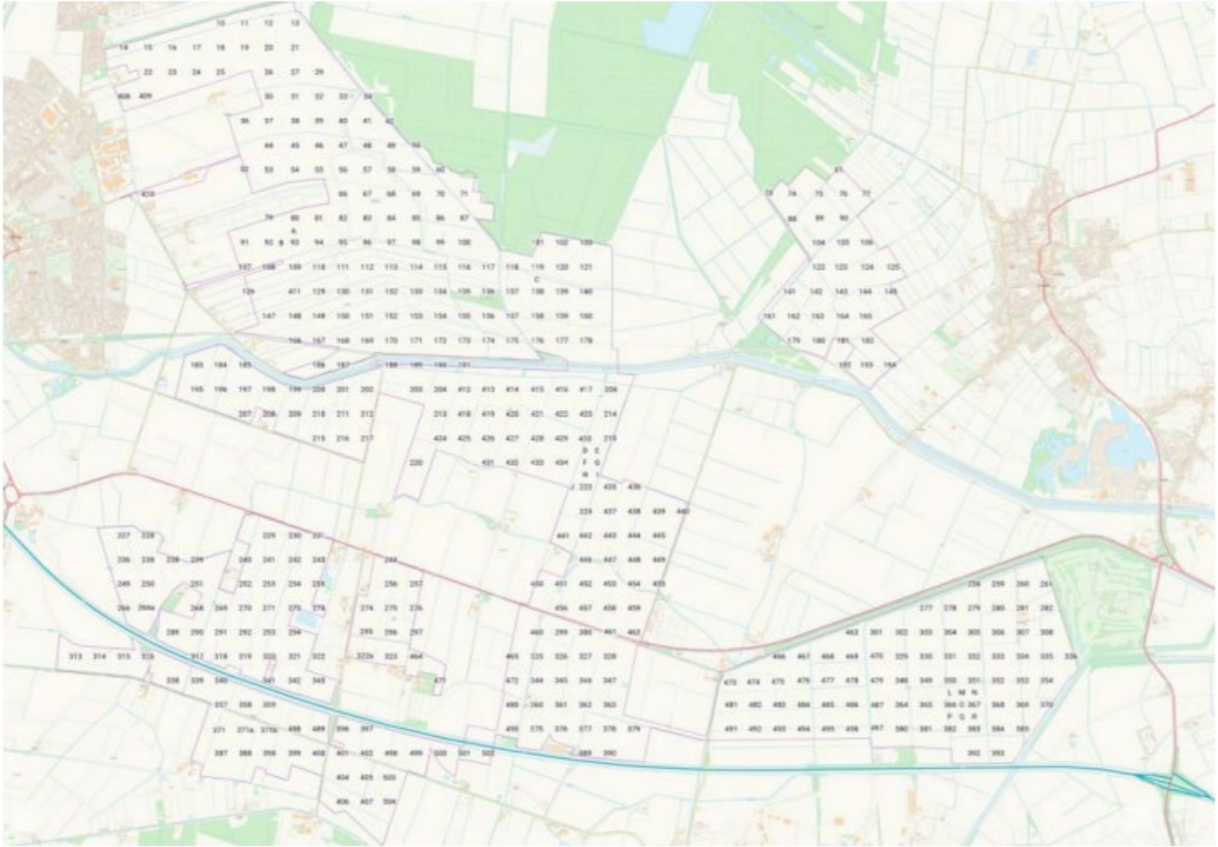
Consultee	Representation	Applicant's Response
	<p>the opportunity to review the strategy before submission, there are a number of minor revisions that should be added:</p> <ul style="list-style-type: none"> • Details arrangements for monitoring the fieldwork by local authorities should be included • The oAMS should use the language of the DCO stating in paragraph 5.11 that site specific WSIs "will be substantially in accordance with this strategy" • In paragraph 5.14, archaeological advisors should be notified of the date of commencement of the archaeological fieldwork at least two weeks in advance • WSIs should also comply with regional and county standards & guidance • Fieldwalking should be undertaken on a 10m transect • Archaeological Monitoring (Watching Brief) –This mitigation measure needs more careful explanation. It cannot be a watching brief if the machine is under the supervision of an archaeologist (paragraph 5.64) • Section 9 should also specify that details of the location and restrictions to works in archaeologically sensitive areas excluded through design or preserved in situ by design should be included in other relevant Outline plans. <p>8.20 SYAS noted in the statutory consultation response that operational and decommissioning effects should not be scoped out and continue to hold this view. No specific measures are proposed for Cultural Heritage as part of the environmental management and monitoring measures in the Outline Operational Environmental Management Plan (oOEMP) [APP-177]. However, there is a minor threat to the archaeological mitigation areas preserved in situ by design or exclusion through a lack of information. A plan showing archaeological mitigation areas should be included in the oOEMP and like for like replacement of foundations and cabling should be stipulated.</p>	<p>Archaeological Mitigation Strategy [App-096] to ensure the approaches detailed are acceptable to the City of Doncaster Council.</p> <p>The Applicant prepared an Outline Archaeological Mitigation Strategy [APP-096] (AMS). Requirement 12 of the Draft DCO [Document Reference 3.1 Revision 3] secures the Outline AMS by stipulating that the written scheme of investigation for each development phase has to be substantially in accordance with the Outline AMS. Requirement 12 also provides approval rights to the relevant local planning authority of a written scheme of investigation for each phase of development.</p>
	<p>8.21 The Outline Decommissioning Environmental Management Plan [APP-178] does include provision for protecting any archaeological remains during decommissioning and SYAS agrees with these. The final document should include a plan showing the archaeological mitigation areas preserved in situ and make provision for decommissioning methods to be assessed by SYAS on behalf of the local planning authority.</p>	<p>The Applicant has included the requested information within the updated Outline Decommissioning Environmental Management Plan [Document Reference 7.3 Revision 2] submitted at Deadline 1.</p>
	<p>8.22 The Outline Landscape Ecological Management Plan (oLEMP) [APP-181] describes operations concerned with the creation of habitats such as harrowing, rolling, tree planting and scrape creation. The impacts of these groundworks will require assessment. The oLEMP should be cross-referenced with the oAMS to ensure that no harmful groundworks undertaken for ecological mitigation occur within areas where archaeological remains are preserved in situ.</p>	<p>The Outline Landscape and Ecological Management Plan [Document Reference 7.6 Revision 2] has been updated to include the archaeological cross reference as is submitted at Deadline 1.</p>

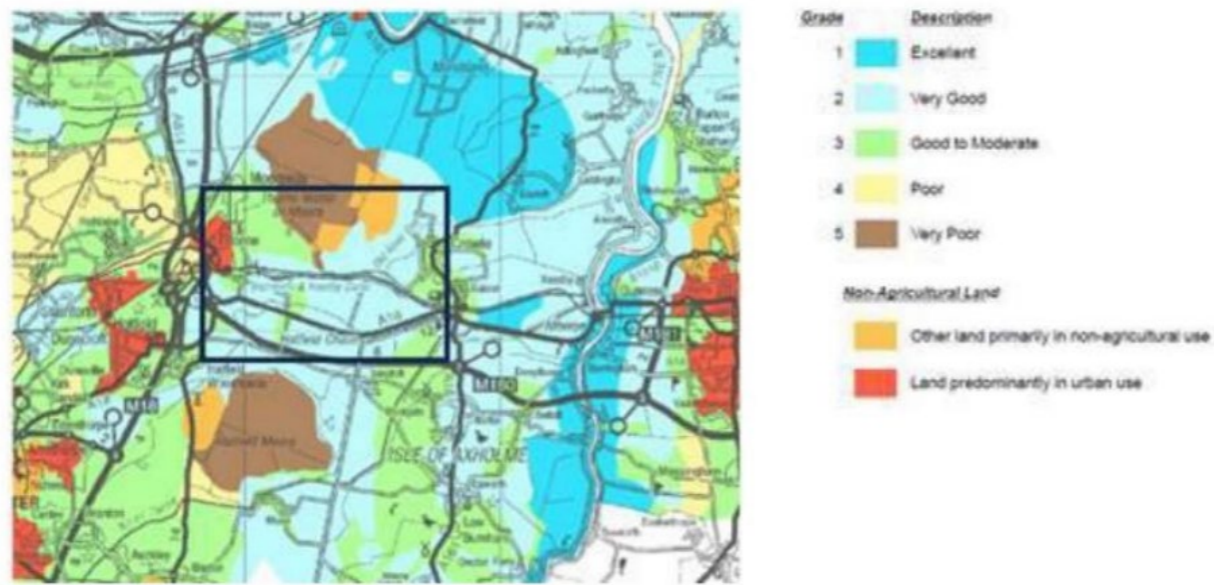
Consultee	Representation	Applicant's Response
	<p>8.23 Based on the content of the SYAS advice above, it is clear to CDC that the Applicant has failed to properly engage with SYAS on substantive matters for a prolonged period, leading to fundamental flaws in the submission. This is another example of the Applicant's disregard for the importance of meaningful, constructive engagement throughout the NSIP process.</p>	<p>The Applicant does not accept City of Doncaster Council's assertion that the submission is 'fundamentally flawed'.</p> <p>There has been ongoing engagement with SYAS during the development of the Scheme which is evidenced through the Consultation Log, section 8.2, in ES Chapter 8: Cultural Heritage and Archaeology [APP-045].</p> <p>SYAS feedback and guidance has been sought and the results used to inform the present assessment and moving forwards with ensuring the delivery of an appropriate scheme of archaeological mitigation.</p>
	<p>9. Socio-economic Impacts (ES Chapter 11)</p> <p><u>Employment Generation:</u></p> <p>9.1 The adopted Local Plan sets out that Doncaster has a relatively low proportion of people employed in highly skilled occupations and wage rates are significantly lower than the national average. Doncaster's economy is relatively reliant on lower skilled sectors that are more sensitive to changes in local demand. Compared to Yorkshire and Humber, our economy is relatively inward facing and more reliant on jobs in health, retail, transport, construction, and public administration. However, it does have significant jobs in several tradeable sectors, for example, manufacturing, engineering, and financial and professional services.</p> <p>9.2 Recognised economic weaknesses at the time of local plan adoption include the following:</p> <ul style="list-style-type: none"> • Lower than average skill levels • Some rural areas have poor access to services and facilities. • Relatively high levels of unemployment and economically inactive residents <p>9.3 Reducing unemployment and worklessness and diversification of the rural economy are seen as key economic challenges, highlighted in the Local Plan.</p> <p>9.4 CDC requested in its Statutory Consultation response that the Applicant should seek to engage positively with Business Doncaster who are expertly placed to provide valuable insight into local markets. It was made clear that through harnessing the local connections, intelligence and support networks that Business Doncaster has, we can ensure that the scheme achieves maximum output and added value in this respect.</p> <p>9.5 It is noted that the Applicant has set out a commitment to the enhancement of employment and skills effects during each development phase as far as is practicably possible. It is also noted that an Outline Supply Chain, Employment and Skills Plan ("Outline SCESP") [APP-184] has been</p>	<p>The Applicant notes the comments relating to the existing socio-economic conditions within Doncaster and confirms that many points made are aligned with analysis provided within ES Chapter 8: Socioeconomics [APP-048].</p> <p>The Applicant is in the process of engaging with Business Doncaster as requested in the Council's Relevant Representation [RR-006]. The Applicant presented a high-level overview of the proposed supply chain, employment, training, and educational opportunities associated with the construction, operation and decommissioning of the Scheme within the Outline Supply Chain, Employment and Skills Plan [Document Reference 7.9 Revision 2] submitted with the application. An updated Outline Supply Chain, Employment and Skills Plan [Document Reference 7.9 Revision 2] accompanies the Deadline 1 submission.</p>

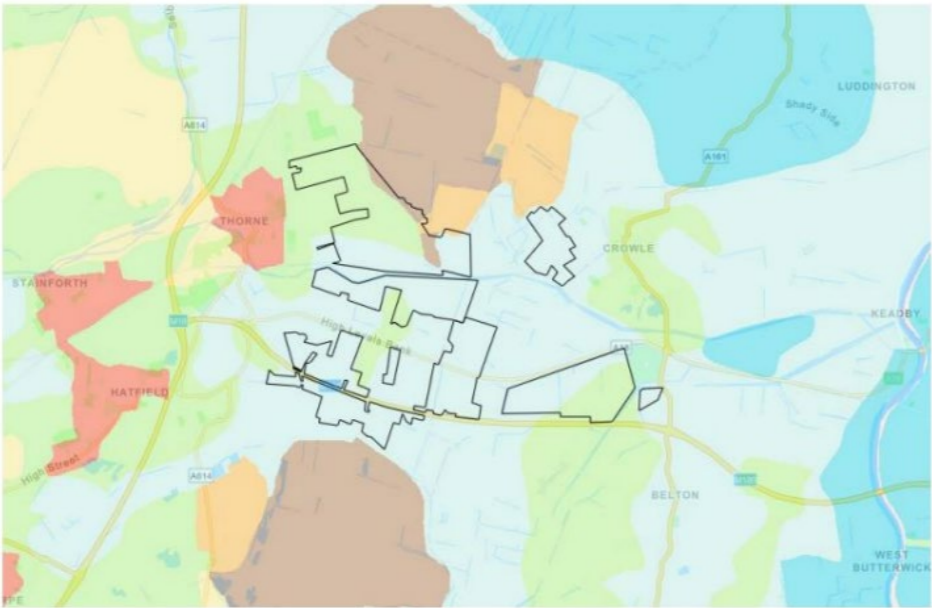
Consultee	Representation	Applicant's Response
	<p>submitted with the application and the delivery of a final SCESP secured by a DCO Requirement</p> <p>The Applicant sets out that engagement with relevant organisations will be undertaken as part of the commitments presented within the Outline SCESP, including but not limited to Business Doncaster.</p> <p>9.6 CDC reserves its position to comment in more detail on the efficacy of the Outline SCESP via the Local Impact Report in due course but would highlight again the importance of early and meaningful engagement with Business Doncaster at the earliest opportunity to maximise benefits in this regard.</p>	
	<p>10. Transport and Access (ES Chapter 12)</p> <p>10.1 CDC considers that the most significant transport and access impacts will be associated with the construction and eventual decommissioning phases of the proposed development. Once operational, it is understood that the proposed development is likely to generate a minimal number of vehicular trips associated with ongoing maintenance and management of the site overall.</p> <p>10.2 During the construction phase of the development a significant number of HGV and LGV traffic will be generated through the delivery of solar panels, mounting equipment and associated infrastructure.</p> <p>10.3 It should be noted that the local highway network surrounding the site is predominately comprised of narrow country lanes that are typical of the rural location. As such, the road network is not designed to be accessed by large HGVs and there are limited safe and convenient routes for construction traffic and maintenance vehicles to access the site without causing disruption to the network, and other users of the network including local businesses.</p> <p>10.4 CDC will constructively review the Framework Plans and would welcome the opportunity to engage with the Applicant to discuss their suitability in close liaison with the relevant teams across the Council as Highways Authority as this has not happened to date.</p> <p>10.5 In the meantime, and in more general terms, the Applicant should be aware that it is Council policy to utilise Section 278 of the Highways Act 1980 agreements to licence a developer to carry out improvement works on public highway which are generally necessary where planning permission has been granted for a development. It is therefore CDC's firm expectation that those requirements contained within the Council's template agreement will be replicated through the agreements to be entered into under Article 18 (Agreements with Street Authorities) of the Draft DCO [APP-016]. The Applicant should be aware that the Council will not accept anything other than this approach.</p> <p>10.6 Furthermore, the Council operates the "Doncaster Permit Scheme" which sets out that anyone intending to carry out work on all streets must apply for a permit which sets out how the</p>	<p>The Applicant notes that the management of construction traffic will be controlled through a Construction Traffic Management Plan secured by requirement 16 of the Draft Development Consent Order [Document Reference 3.1 Revision 3], which will be substantially in accordance with the Outline Construction Traffic Management Plan [APP-182]. As regards operational traffic, the ES Chapter 12 Transport and Access [APP-049] confirms that during the operational phase of the development, the effects would be negligible and not significant.</p> <p>The ES Chapter 12: Transport and Access [APP-049] confirms that the impact of construction traffic is generally considered to be of negligible to moderate significance. Mitigation has been provided in the form of an Outline Construction Traffic Management Plan [APP-182] to reduce the impacts of the construction phase. The document includes a range of management and mitigation measures to reduce the impacts of the construction phase. The proposed mitigation is forecast to reduce the significance of effect of Moderate to Minor and Not Significant.</p> <p>The Applicant is engaging with highway officers at City of Doncaster Council to discuss the Scheme and outcomes will be presented within the SoCG. The Applicant's latest working draft SoCG with City of Doncaster Council [Document Reference 9.2 Revision 1] is submitted at Deadline 1.</p>

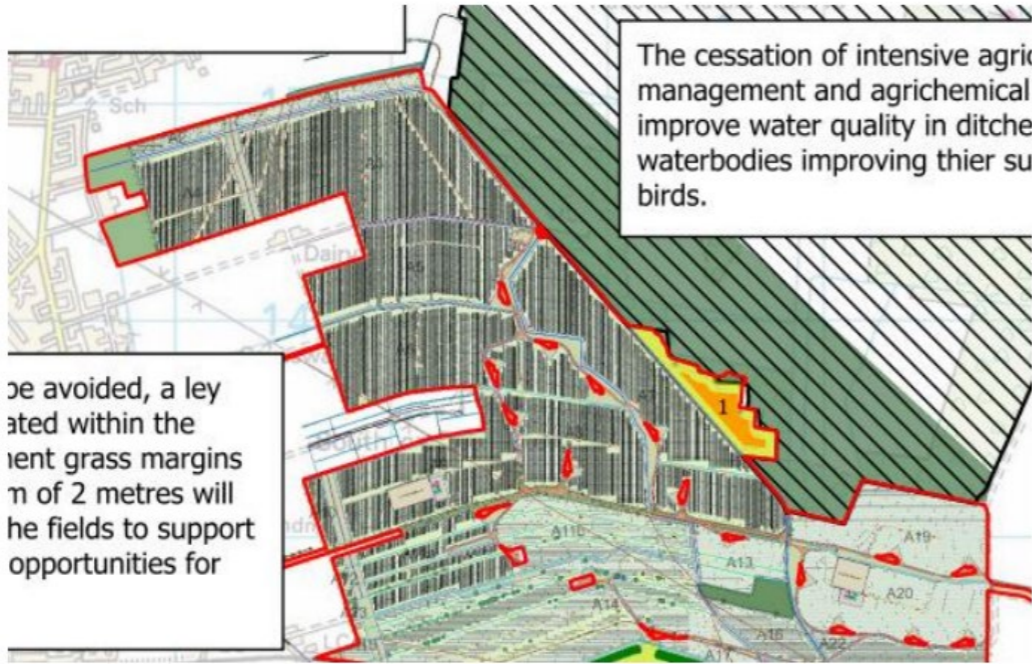
Consultee	Representation	Applicant's Response
	<p>work must be undertaken to minimise disruption to the network. Again, the Council expects the requirements of the Permit Scheme Document be enshrined within the DCO itself to ensure the effective ongoing management of the highway network during the construction phase of the development.</p> <p>10.7 In support of this approach, CDC would direct the Applicant's attention to the final DCO agreed between the parties in respect of the Fenwick Solar Farm which sets these provisions out. The firm expectation of the Council is that these provisions will be replicated in the Draft DCO in this case.</p>	
	<p>11. Loss of agricultural land (ES Chapter 15)</p> <p>11.1 In respect of this issue, the following documents have been considered:</p> <ul style="list-style-type: none"> • ES Chapter 15 Agricultural Circumstances [APP-052] • ES Appendix 15.1 Agriculture Land Classification [APP-173] • Cumulative Sites Plan [APP-175] • Outline Landscape Ecological Management Plan (Rev 1) [APP-181] • Outline Soil Management Plan (Rev 1) [APP-183] <p>11.2 Agriculture is the main land use within the Borough making up nearly two thirds of the total land area. The soils found in the Borough vary in quality from highgrade arable farmland (grades 2 and 3) and its extensive network of drains and channels in the east of the Borough, land reclamation on former colliery sites, through to remediated brownfield sites within former industrial areas. Around half of the land area of the Borough is given over to arable farming. The adopted local plan recognises that Doncaster's high quality agricultural land needs to be protected from inappropriate development so that we can maximise its economic benefits such as local food production.</p> <p>11.3 At the outset, it is important to note that another solar farm proposal (Fenwick) has recently concluded its Examination phase, and CDC awaits the SoS decision. This is identified as 'Site 24' in APP-175. Whilst currently undecided, given its advanced position in the NSIP process, this is another large solar farm project, located in the north of Doncaster, and it is therefore important that the cumulative impact of agricultural land-take of both these projects is fully considered.</p> <p>11.4 Another solar farm proposal is also in preparation (Whitestone – Conisbrough, Doncaster) – anticipated for submission mid-2026 and likewise this proposal will also need to consider cumulative impacts of the significant land take of agricultural land from these solar farm proposals, along with other major developments.</p> <p><u>Summary of CDC Consultation to the Scoping Report</u></p>	<p>The comments of City of Doncaster Council on agricultural circumstances largely take the form of a summary of facts set out in the ES and with reference to other documents. The Applicant does not criticise City of Doncaster Council for this approach, but notes that this response therefore seeks to draw out comments, statements or points of concern that warrant a response, rather than a paragraph by paragraph response.</p> <p>The key comments, statements or points of concern raised by City of Doncaster Council are understood to be as follows, cross referenced to City of Doncaster Council's commentary:</p> <ul style="list-style-type: none"> • Peat deposits may be more extensive than noted and should be assessed and included in the ES and the Outline Soil Management Plan [Document Reference 7.8 Revision 2] (11.7, 11.8, 11.19) as they may have policy implications (11.36); • a clearer commentary could be provided of how the scheme has evolved to preserving, where possible, BMV soils (11.10, 11.26, 11.27); • City of Doncaster Council is not readily able to source a plan that shows the divisions of Parcels A to E (11.25); • City of Doncaster Council recommends that the areas identified for more extensive soil movement are identified on an agricultural soils map to better aid an understanding of where they are (11.32); • City of Doncaster Council has concerns about the potential effects of compaction from soil removal and the installation of bases (11.33, 11.34) and wishes to work with the Applicant to seek opportunities to further minimise BMV loss (11.39); • City of Doncaster Council considers that sheep farming is not the optimum agricultural use (11.40). <p>Peat</p>

Consultee	Representation	Applicant's Response
	<p>11.5 CDC (28 February 2023) advised that: 'An assessment of the potential for soil compaction and effects on peat should be included'.</p> <p>11.6 In response, the Applicant has advised that these effects are considered in this chapter in Sections 15.5 to 15.7, and principles to avoid these effects are set out in the outline SMP [APP-183]. The ALC Report at Appendix 15.1 [APP-173] did not identify peaty soils at agricultural depth.</p> <p>11.7 CDC can find no reference to peat, should peat be encountered, in the outline Soil Management Plan.</p> <p>11.8 Having reviewed the ALC Report, peat deposits are clearly identified in trial holes 122, 138, 139, 159, 160 and 177 located to the south of Thorne Moors where it was expected to continue from the 1970's high level soil map (see below). Also, peat is identified in trial holes 122, 141 and 161 (beyond CDC) but in the same general location (i.e. to the south and east of Thorne Moors). This strongly suggests a more significant and wide-spread deposit of peat in this locality, which has not been considered in detail and must be assessed and where required the impacts mitigated in order to comply with Doncaster Local Plan Policy 60 Part D).</p> <p><u>Summary of CDC Consultation Responses to the PEIR</u></p> <p>11.9 CDC advised that: 'All possible opportunities to limit the extent of Best and Most Versatile (BMV) land being utilised by the Scheme should be given, as such land has economic value.</p> <p>11.10 In response, the applicant states that the extent of BMV land within the Order Limits has been assessed, as set out in Section 15.4. The economic and land use implications are considered in Sections 15.5 to 15.7. However it is unclear how, if at all, the proposed scheme has been amended from the early preapplication stages in order to address the important planning concern of preserving where possible BMV soils.</p> <p><u>Main issues</u></p> <p>11.11 At this stage, CDC would comment that the project appears not to have taken the opportunity to limit the extent of agricultural land (much of which is classed as BMV) being utilised by the Scheme since earlier pre-applications phases, but instead only details that the agricultural land has been assessed. This is discussed in more detail below.</p> <p>11.12 A field survey has been undertaken by the Applicant between May 2023 and June 2025. In total 1,848 hectares (ha) of agricultural land has been classified across Parcels A to E and the cable routes between them. Across most of the Order Limits surveys have been undertaken on a regular 200m grid (one auger per 4ha)</p>	<p>The ALC identified peaty subsoils, as set out in ES Appendix 15.1 Agricultural Land Classification [APP-120] in Appendix 3. This includes in areas identified by City of Doncaster Council , as well as in an area south of the A18 (244, 256, 257, 274, 275, 295-7) and two points in the far west of the site (227, 228).</p> <p>The soils recorded as peat were mostly recorded at depth of 50-60cm down to 120cm (ALC maximum depth). Slightly shallower peaty subsoils were found at 120, 122, 141 and 161, all found as a subsoil layer between different soils, with peaty soils at depths of 35/40cm to 45/70cm, with a variable layer of 10cm to 40cm identified.</p> <p>The subsoils identified as peaty subsoils were found below dark topsoils indicating high levels of organic matter, but none of the topsoils were sufficiently high in organic matter to be recorded as organic mineral soil, peaty or peat.</p> <p>It is the Applicant's understanding that these soils do not fall within the "high environmental value" soils identified in the Doncaster Local Plan Policy 60 (D).</p> <p>Nevertheless, the suggestion by City of Doncaster Council that a separate section of the Outline Soil Management Plan [Document Reference 7.8 Revision 2] be provided dealing specifically with the peaty subsoils, is accepted. The Outline Soil Management Plan [Document Reference 7.8 Revision 2] has been updated to include where these soils are, and how they should be handled to minimise any impacts. The document accompanies the Deadline 1 submission.</p> <p><u>Avoiding BMV</u></p> <p>A separate document explaining how the use of BMV land has been considered and minimised, so far as possible and in recognition of the many variables involved in a scheme's design will be produced for this Scheme, and will be provided at Deadline 2.</p> <p><u>Divisions of Parcels A to E</u></p> <p>The numbering of A to E is taken from the Indicative Operational Layout Plan, ES Figure 2.2a Indicative Operational Layout Plan (Fixed Solar Panels) [APP-134] and ES Figure 2.2b Indicative Operational Layout</p>

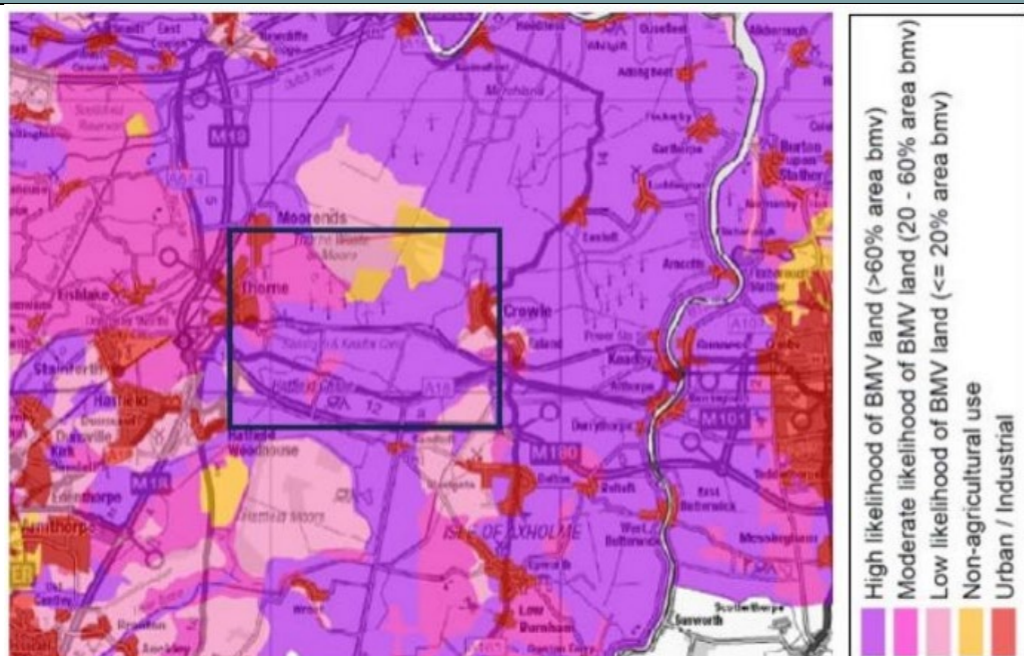
Consultee	Representation	Applicant's Response
	 <p><u>National and Local Policy</u></p> <p>11.13 The National Policy Statement for Energy (NPS EN-1) paragraph 5.11.12 advises that the use of BMV land should be minimised, with a preference for use of poorer quality land. Paragraph 5.1.13 goes on to advise that applicants should seek to minimise impacts on soil health and promote soil quality through mitigation.</p> <p>11.14 National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) advises that while land type should not be a predominating factor, land of lower ALC grade (non-BMV) should be preferred where possible.</p> <p>11.15 The National Planning Policy Framework ('NPPF') (December 2024) defines BMV land at Annex 2. Paragraph 187(b) sets out that that the economic and other benefits of BMV agricultural land should be recognised in planning decisions</p> <p>11.16 The Doncaster Local Plan (Policy 60) aims to protect soil resources, stating that:</p> <p>Proposals affecting land and water resources will be expected to comply with the following criteria:</p>	<p>Plan (Fixed and Tracker Solar Panels) [APP-135]. The Applicant accepts that this cross-reference was not provided in ES Chapter 15: Agricultural Circumstances [APP-052].</p> <p><u>Areas Identified on a Plan</u></p> <p>The areas of track, switchgears, spares containers, inverters, BESS, 132 kV and 400 kV substations, are identified indicatively on the two Indicative Operational Layout Plans (fixed and tracker layout): ES Figure 2.2a Indicative Operational Layout Plan (Fixed Solar Panels) [APP-134] and ES Figure 2.2b Indicative Operational Layout Plan (Fixed and Tracker Solar Panels) [APP-135]. It would be possible to overlay these onto an ALC and produce a plan, if requested by the ExA. An overlay and measurement was carried out in order to measure the areas involved for the ALC assessment in ES Chapter 15: Agricultural Circumstances, Table 15-13 [APP-052]. Cross-reference between these plans and ES Figure 15.1 Agricultural Land Classification [APP-173] will enable an easy assessment of where the key elements of the project are located in terms of ALC grade.</p> <p><u>Compaction</u></p> <p>City of Doncaster Council's concerns regarding compaction relate mostly to the proposed access tracks, BESS and substation areas (CDC paragraph 11.31).</p> <p>The potential for compaction from these works is recognised, although the potential for downgrading of ALC grade due to compaction is limited. The Outline Soil Management Plan [Document Reference 7.8 Revision 2] sets out in section 6.4 and 6.5 in outline how the areas will be restored. This will involve the removal of the hard surface and matting, following by mechanical decompaction works (typically subsoiling) at an appropriate depth and in appropriate soil conditions.</p> <p>Topsoil will then be replaced over the decompacted subsoil. These areas can be fully restored to comparable ALC grade.</p> <p>Restoration of the tracks and the BESS area, neither of which generally require more than topsoil removal, involves these works. The works involved with the substation are more extensive, and Chapter 15 of the ES sets out an assessment based on a worst-case scenario that the</p>

Consultee	Representation	Applicant's Response
	<p>A) Proposals on non-allocated sites that involve the significant loss of the best and most versatile agricultural land (grades 1, 2 and 3a) will only be supported where:</p> <ol style="list-style-type: none"> 1. there are no other suitable alternative locations on lower quality agricultural land (or non-agricultural land) available; or 2. the land can be reinstated back to its previous state (where possible). <p>B) Developers will need to demonstrate through an on-site assessment the actual grading where significant development takes place on agricultural land.</p> <p>C) Proposals will need to demonstrate that all practicable steps have been taken for soil resources to be conserved and managed in a sustainable way.</p> <p>D) Development which would disturb or damage any soils of high environmental value (e.g. peats and other soils contributing to ecological connectivity, carbon stores such as peatlands and flood risk alleviation etc.) will not normally be permitted.</p> <p><u>Agricultural Land Classification</u></p> <p>11.17 The Order Limits is shown on the "provisional" ALC maps from the 1970s as being of Grade 2 "very good" agricultural land quality and undifferentiated Grade 3 "good to moderate" quality. It is worth noting that the 'poor soils' (shown as brown areas) identified on this map are actually potentially extremely important peat reserves on Thorne and Hatfield Moors, which Policy 60 specifically seeks to protect under Part D).</p> <p>11.18 The development footprint whilst directly adjacent to Thorne Moors in part encroaches into potential areas of peat (see plan below for the brown 'arm' located in the development footprint) and the trial hole consideration given above.</p> 	<p>3.4kV substation may not be restored. Once detailed works required for the construction of the substation areas is finalised, which will be post-DCO, the Soil Management Plan will need to provide more detailed information regarding the stripping of topsoils and subsoils, and the storage of that material.</p> <p>The Applicant welcomes City of Doncaster Council's involvement in that detailed process, as is requested in City of Doncaster Council paragraph 11.39.</p> <p><u>Sheep Farming</u></p> <p>City of Doncaster Council paragraph 11.40 notes that sheep farming "is not the optimal agricultural use". Neither legislation nor planning policy requires agricultural land to be farmed in any particular way, to any particular intensity. The intensity of use does not affect agricultural land quality (Natural England's Technical Information Note TINO49, reference 1 of ES Chapter 15), noting that "the current agricultural use, or intensity of use, does not affect the ALC grade".</p> <p>There is no policy requirement for land to be farmed to its optimal use. As noted in the ES, Chapter 15: Agricultural Classification [APP-052], paragraph 15.5.77, in 2024 some 305,000 ha of arable land was being used for agri-environmental uses. The 2025 figures, published in September 2025, recorded 444,000 ha of arable land in agri-environmental use, with a further 101,000 ha of arable land uncropped (Defra, Agricultural Land Use in England at 1 June 2025, 25 September 2025).</p> <p>Therefore, whilst the comments of City of Doncaster Council are noted, there is no policy harm or actual harm, as described in the ES.</p>

Consultee	Representation	Applicant's Response
	 <p data-bbox="409 848 1113 995"> Provisional Agricultural Land Classification (ALC) (England) Grade 1 Grade 2 Grade 3 Grade 4 Grade 5 Non Agricultural Urban </p> <p data-bbox="409 1045 1264 1121"> Figure 15.6 Provisional ALC of Order Limits Parcels A to E (marked approximately by the black lines) </p> <p data-bbox="409 1159 1757 1352"> 11.19 It is also extremely important to fully understand how the proposal may indirectly impact the soil environment and importantly the water environment – which is critical for the future preservation of the statutorily protected peatland Moors (via appropriate assessment and detailed modelling of the water environment – noting this is more a concern for Natural England and the Environment Agency, but is an issue that CDC is extremely concerned about). </p> <p data-bbox="409 1381 1721 1457"> 11.20 This is especially the case for the proposed solar arrays directly abutting Thorne Moors in the north-western part of the proposal, below: </p>	

Consultee	Representation	Applicant's Response
	 <p>The cessation of intensive agricultural management and agricultural chemical use will improve water quality in ditches and waterbodies improving their suitability for birds.</p> <p>To be avoided, a ley rotation system within the adjacent grass margins of 2 metres will be implemented to support opportunities for...</p> <p>11.21 In 2017, Natural England published plans showing the likelihood of the proportion of BMV agricultural land. These maps divide the agricultural land across England into three categories of proportions:</p> <ul style="list-style-type: none"> • High (>60% area of BMV agricultural land) • Moderate (20 - 60% area of BMV agricultural land); and • Low (<20% area of BMV agricultural land) 	

Consultee	Representation	Applicant's Response
-----------	----------------	----------------------







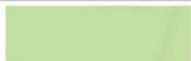



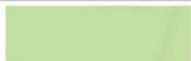



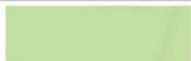
11.22 The Order Limits are shown as being mostly in the high likelihood of comprising BMV agricultural land, as is much of the wider area in the vicinity. Parts of the Order Limits, particularly the northern part, are shown as falling into the moderate likelihood of BMV.


11.23 The estimate of land by ALC Grade in England, North Lincolnshire and Doncaster District is provided in Table 15-6. In respect of the baseline data for the two local planning authority areas, they both contain an above-average proportion of BMV, as estimated from the 1:250,000 series provisional maps.

Table 15-6 Estimate of Land by ALC Grade

ALC Grade	England		North Lincolnshire		Doncaster District	
	Ha	%	Ha	%	Ha	%
1 Excellent	354,562	3.1	8,249	10.6	0	0
2 Very good	1,848,874	16.2	37,177	47.6	15,710	32.8
3 Good to moderate	6,290,210	55.0	31,237	40.0	22,205	46.3
4 Poor	1,839,581	16.1	1,382	1.8	7,330	15.3
5 Very poor	1,100,305	9.6	11	0	2,700	5.6
Total	11,433,532	100.0	78,056	100.0	47,945	100.0
BMV Estimate⁽¹⁾	4,802,100	42	61,400	78.6	25,600	53.4

⁽¹⁾ Grades 1 and 2 added together x 1.09, plus 38% of Grade 3, rounded to nearest 100 ha.

Consultee	Representation	Applicant's Response																																			
	<p>11.24 This shows that, as an estimate, 78.6% of North Lincolnshire is BMV on the provisional maps, and 53.4% is BMV in Doncaster, compared to a national average of 42%.</p> <p>11.25 Surveys have subsequently been completed by the Applicant on a detailed or semi-detailed basis across the Solar PV development and the connections between Parcels A to E. The results for Land Parcels A to E are shown as follows, but CDC would note that it has not readily been able to source a plan in the submission that shows how the site has been divided up into parcels A, B, C, D and E. for reference purposes:</p>  <table border="1" data-bbox="403 1188 1285 1612"> <thead> <tr> <th>Plan Colour</th> <th>ALC Grade</th> <th>Description</th> <th>Area (ha)</th> <th>Proportion (%)</th> </tr> </thead> <tbody> <tr> <td></td> <td>1</td> <td>Excellent</td> <td>48</td> <td>2.6</td> </tr> <tr> <td></td> <td>2</td> <td>Very good</td> <td>180</td> <td>9.8</td> </tr> <tr> <td></td> <td>3a</td> <td>Good</td> <td>585</td> <td>32.0</td> </tr> <tr> <td></td> <td>3b</td> <td>Moderate</td> <td>1,001</td> <td>54.7</td> </tr> <tr> <td></td> <td>N/A</td> <td>Not affected</td> <td>17</td> <td>0.9</td> </tr> <tr> <td></td> <td></td> <td>Total</td> <td>1,831</td> <td>100.0</td> </tr> </tbody> </table> <p>11.26 It is clear from the above findings that there have been opportunities to exclude certain areas of BMV land within Doncaster, detailed as a key consideration in the pre-submission phases and which comprise 'outlying areas' that could have been reasonably excluded from the main bulk of the proposal. These are shown below:</p>	Plan Colour	ALC Grade	Description	Area (ha)	Proportion (%)		1	Excellent	48	2.6		2	Very good	180	9.8		3a	Good	585	32.0		3b	Moderate	1,001	54.7		N/A	Not affected	17	0.9			Total	1,831	100.0	
Plan Colour	ALC Grade	Description	Area (ha)	Proportion (%)																																	
	1	Excellent	48	2.6																																	
	2	Very good	180	9.8																																	
	3a	Good	585	32.0																																	
	3b	Moderate	1,001	54.7																																	
	N/A	Not affected	17	0.9																																	
		Total	1,831	100.0																																	

Consultee	Representation	Applicant's Response
	 <p>11.27 As such, CDC is disappointed that the advice to the Applicant at the PEIR stage has not been addressed and CDC requires a detailed understanding of why this was not taken forward to achieve a balance of renewable energy production and agricultural land production on BMV soils. The Applicant is furthermore strongly encouraged to give further consideration to excluding these areas.</p> <p>11.28 In addition to the peat concerns, the 'AMET Property' report [APP-120], assesses the Agricultural Land Classification (ALC) grading of 1848.2 ha of agricultural land between Thorne and Crowle in Lincolnshire and South Yorkshire. The land is graded as follows:</p> <ul style="list-style-type: none"> • Grade 1 - 48.3 Ha • Grade 2 - 184.4 Ha • Grade 3a - 586.5 Ha • Grade 3b -1029 Ha <p>11.29 In terms of impacts from the proposed development, this has been considered in terms of:</p> <ol style="list-style-type: none"> 1. Panel areas 2. Construction compounds 3. Cabling 4. Fixed equipment 5. Fencing 6. BESS and sub-stations <p>11.30 In summary – the impacts are detailed as follows:</p>	

Consultee	Representation			Applicant's Response																						
	<table border="1" data-bbox="418 247 1389 598"> <thead> <tr> <th data-bbox="418 247 780 342">Works</th> <th data-bbox="780 247 1077 342">Temporary/ Permanent</th> <th data-bbox="1077 247 1389 342">Significance of Effect</th> </tr> </thead> <tbody> <tr> <td data-bbox="418 342 780 405">Panel Areas</td> <td data-bbox="780 342 1077 405">Temporary</td> <td data-bbox="1077 342 1389 405">Negligible</td> </tr> <tr> <td data-bbox="418 405 780 468">Construction compounds</td> <td data-bbox="780 405 1077 468">Temporary</td> <td data-bbox="1077 405 1389 468">Minor adverse</td> </tr> <tr> <td data-bbox="418 468 780 531">Access tracks</td> <td data-bbox="780 468 1077 531">Temporary</td> <td data-bbox="1077 468 1389 531">Minor adverse</td> </tr> <tr> <td data-bbox="418 531 780 594">Cabling within Panel Areas</td> <td data-bbox="780 531 1077 594">Temporary</td> <td data-bbox="1077 531 1389 594">Negligible</td> </tr> </tbody> </table> <table border="1" data-bbox="418 651 1389 877"> <tbody> <tr> <td data-bbox="418 651 780 751">Inverters, Spares Containers, Switchgear</td> <td data-bbox="780 651 1077 751">Temporary</td> <td data-bbox="1077 651 1389 751">Minor adverse</td> </tr> <tr> <td data-bbox="418 751 780 814">Fencing and CCTV</td> <td data-bbox="780 751 1077 814">Temporary</td> <td data-bbox="1077 751 1389 814">Negligible</td> </tr> <tr> <td data-bbox="418 814 780 877">BESS Areas</td> <td data-bbox="780 814 1077 877">Temporary</td> <td data-bbox="1077 814 1389 877">Minor adverse</td> </tr> </tbody> </table> <p data-bbox="403 919 1754 1192">11.31 Whilst CDC acknowledges the use of the land is 'temporary' for the majority of the elements i.e. in particular the solar panel arrays, other aspects of the development are considered to be more 'permanent'. In addition, the submission contends that the majority of the development will only lead to 'minor adverse' and 'negligible' effects on agricultural land quality. The main concerns here are the proposed access tracks (23.9Ha), BESS and substations (17.5Ha) – a total area of 41.4Ha. These aspects are considered to have a much more significant impact on the agricultural resource and in a more permanent manner.</p> <p data-bbox="403 1224 1754 1455">11.32 It is therefore recommended that the proposed development's more disturbing impacts (i.e. access tracks, BESS and sub-stations) be overlain on the base agricultural soils map to allow for more referable consideration – not only by CDC but by anyone i.e. members of the public, community groups etc. with an interest in the development proposals. This would enable them to more clearly identify the quality of the soils assessed and understand those more significantly impacted. This is especially the case, given that the submitted report [APP-052] states:</p> <p data-bbox="403 1486 1709 1560">15.3.6 – In areas proposed for RWE on-site substation and the four separate BESS areas where soil movement is required and accordingly there is the potential to affect land quality.</p> <p data-bbox="403 1591 1581 1633">15.4.12 – In the BESS and RWE substation areas there is a greater level of disturbance.</p> <p data-bbox="403 1665 1626 1738">15.5.2 – Each 100MW BESS is estimated to involve about 2.5ha of land. Each of the 132kV substations is estimated to require only 0.7 ha.</p>	Works	Temporary/ Permanent	Significance of Effect	Panel Areas	Temporary	Negligible	Construction compounds	Temporary	Minor adverse	Access tracks	Temporary	Minor adverse	Cabling within Panel Areas	Temporary	Negligible	Inverters, Spares Containers, Switchgear	Temporary	Minor adverse	Fencing and CCTV	Temporary	Negligible	BESS Areas	Temporary	Minor adverse	
Works	Temporary/ Permanent	Significance of Effect																								
Panel Areas	Temporary	Negligible																								
Construction compounds	Temporary	Minor adverse																								
Access tracks	Temporary	Minor adverse																								
Cabling within Panel Areas	Temporary	Negligible																								
Inverters, Spares Containers, Switchgear	Temporary	Minor adverse																								
Fencing and CCTV	Temporary	Negligible																								
BESS Areas	Temporary	Minor adverse																								

Consultee	Representation	Applicant's Response
	<p>15.5.23 – The RWE on-site 400kV Substation is to be located north of one of the BESS areas (in Parcel E16) and is of the order of 3.4ha.</p> <p>11.33 The contention that the BESS/sub-stations will only have a ‘minor adverse effect’ on soils is considered by CDC to be downplaying the impact because soils clearly need to be removed to form a structurally sound base, via hardstanding.</p> <p>11.34 Measures to mitigate against damage to the structure, function and resilience of soil resources during construction and operation and maintenance are set out in the Outline Soil Management Plan [APP-183]. At paragraph 4.3.2, it is stated that: ‘Construction compounds are built by either matting over the top of the topsoil, or by stripping topsoil and storing it on the edge of the site. A matting is then laid down, and typically stone imported and levelled.’</p> <p>11.35 Whilst CDC acknowledge these areas only form a relatively small part of the overall scheme, it is nevertheless an important policy consideration and constitutes perhaps the most impactful part of the proposal. Matting and overlaying with stone as a potential approach for the proposed infrastructure will likely lead to compaction and impact soil quality. In short, the overarching strategy at paragraph 4.3.2 is uncertain.</p> <p>11.36 The Doncaster Local Plan (Policy 60) sets out that where significant development is unavoidable, preference will be given to the use of poorer quality agricultural land in preference to higher quality land. The rationale for including outlying areas of the proposal and not excluding them to avoid increased impacts to the agricultural resource therefore needs to be fully detailed. This additional level of detail should be clearly illustrated, assessed and discussed for further consideration in terms of both national and local policy aims to limiting impacts to the BMV soil resource, with robust reasonings why lower grade agricultural land could not be utilised for these solar farm components. Care also needs to be taken to avoid damage or disturbance to soils of high environmental value and other soils that contribute significantly to ecosystem services with more clarity being provided.</p> <p>11.37 The Outline Landscape Ecological Management Plan (Rev 1) [APP-181] shows at Figure 1 that large parts of the site (as shown in the orange areas) are proposed for interventions such as ‘scrapes’. How these may impact on the agricultural soil resource also need to be fully considered as part of the totality of agricultural soil impacts.</p> <p>11.38 Requirement 10 in Schedule 2 of the Draft DCO [APP-016] secures the approval of a detailed Soil Management Plan (‘SMP’), which must be substantially in accordance with the Framework SMP and implemented as subsequently approved. The same approach is envisaged via the need for the approval of a detailed LEMP at Requirement 8 in Schedule 2 of the Draft DCO.</p>	

Consultee	Representation	Applicant's Response
	<p>11.39 CDC would therefore welcome the opportunity to continue to work with the applicant on this aspect of the scheme to establish any scope for a further reduction to BMV loss, with the further positive consequence of wherever possible reducing landscape impact.</p> <p>11.40 Lastly in this respect, CDC notes that the submission includes some commentary on the scheme providing for a lowland sheep farm of significant scale, albeit scant supporting detail on this has been provided. CDC considers that sheep farming of the land is not the optimum agricultural use; if it were, such farming would have already developed on the land over time. In fact, the particular and distinct landscape of the area (as described in Section 8 of this Relevant Representation) lends itself instead to arable farming in the form practised here since at least the 1840s.</p>	
	<p>12 Other Environmental Topics (ES Chapter 16)</p> <p><u>Glint and glare:</u></p> <p>12.1 CDC would emphasise in the strongest of terms that the reopening the airport is a key strategic priority for the Council, with a plan for passenger flights to resume. As such, CDC requests that the impacts on the airport be fully accounted for within the final ES and that the baseline for all relevant assessments contained within it are with the airport as fully operational.</p> <p>12.2 This is further highlighted by Local Plan Policy 58(B) of the adopted Local Plan sets out that in all cases low carbon and renewable energy proposals will be supported where they (inter alia) allow the continued safe and efficient operation of Doncaster Sheffield Airport.</p> <p>12.3 CDC will provide further, detailed feedback on the assessments undertaken in this respect through its Local Impact Report in due course and in this respect intends to consult with its own retained consultant.</p>	<p>The Applicant notes that the Glint and Glare section of Chapter 16: Other Topics of the ES [APP-053] considers the possible impacts on Doncaster Sheffield Airport. The full study on glint and glare, undertaken for the Scheme is available in ES Appendix 16.1 – Glint and Glare Assessment (fixed and tracker design) [APP-122] and ES Appendix 16.2 – Glint and Glare Assessment (fixed design) [Document Reference 6.3.16.2 Revision 2].</p> <p>There is no significant impact predicted from Glint and Glare on aircraft using Doncaster Sheffield Airport. This is because:</p> <ul style="list-style-type: none"> • Solar reflections towards the ATC Tower are unlikely to be geometrically possible based on the location of the receptor relative to the Scheme (considering distance, height, and orientation). Any reflections that are geometrically possible are likely to be screened by intervening terrain, buildings, and/or vegetation. • Any solar reflections geometrically possible towards aircraft on the final two-mile approach towards runway 20 would be outside of a pilot's primary horizontal field of view (50 degrees either side of the approach bearing). At worst, a low impact is predicted on pilots on this approach path based on the associated guidance and industry best practice for licensed airfields. • Any solar reflections geometrically possible towards aircraft on the final two-mile approach towards runway 02 are predicted to

Consultee	Representation	Applicant's Response
		<p>have glare intensities no greater than 'low potential for temporary after-image'. Considering the associated guidance and industry best practice pertaining to approach paths, it can be reliably determined that this level of glare is acceptable for these receptors.</p>
	<p>13 Draft Development Consent Order</p> <p>13.1 At this stage the Council reserves its position on the relevant parts of the Draft DCO including the proposed requirements which are likely to be needed to be amended or added to at the examination progresses, subject to obtaining its own legal advice.</p> <p>13.2 Notwithstanding this, attention is drawn at this stage to the terms agreed within the final version of the Fenwick DCO, particularly in respect of how CDC expects discharging of Requirements to be resourced. It is essential that CDC is properly resourced to undertake this work. The current fee regime (as set out at Part 2, Schedule 2 (procedure for discharge of requirements)) is unsatisfactory and CDC considers it should be replaced with a Planning Performance Agreement ("PPA") which provides for the full recovery of CDC's costs. CDC would welcome the opportunity to discuss this further with the Applicant as the process continues.</p>	<p>The Applicant acknowledges the requirement for further resource for City of Doncaster Council to undertake necessary work required as part of the examination. The Applicant can confirm that a Planning Performance Agreement (PPA) has been agreed and signed by both the Applicant and City of Doncaster Council to enable the local authority to facilitate the necessary resources duration of the examination. The Applicant duly acknowledges City of Doncaster Council's comments regarding the resourcing of work associated with the discharge of requirements and notes that fees for discharge of requirement applications are based on those set out in regulations, i.e., the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012, and are widely precedented in DCOs . Nevertheless, the Applicant welcomes the opportunity to discuss City of Doncaster Council 's post examination resourcing at the appropriate time.</p>
	<p>14 Concluding Remarks</p> <p>16.1 Taking the above in combination, CDC submits that importance of this area, including the totality of the Order limits within the administrative boundary of Doncaster, has been fundamentally underestimated in terms of its special qualities and ultimately its value. This special historic landscape in fact has very clear and important value in visual, agricultural/economic, heritage and ecological terms – which all have an interrelationship and are mutually beneficial and supportive – and CDC considers that this value has been largely disregarded by the Applicant's approach and would ultimately be destroyed as a result of the proposed development.</p> <p>16.2 In all the above respects, where necessary, CDC would welcome the opportunity for ongoing, positive and meaningful dialogue with the Applicant, which to date continues to be lacking in any meaningful or constructive way. Further substantive comment will be provided accordingly in the Local Impact Report.</p>	<p>The Applicant has assessed the potential impacts of the Scheme through the Environmental Statement (ES) which is supported by the technical appendices that underpins the conclusions of the ES.</p> <p>The Applicant welcomes the recent completion of the Planning Performance Agreement which facilitates a project management framework for ongoing consultation with City of Doncaster Council during the pre-examination and examination stages.</p>

3 Table 3-1 North Lincolnshire Council Representation

Consultee	Representation	Applicant's Response
<p>North Lincolnshire Council</p>	<p>I am writing on behalf of North Lincolnshire Council (NLC) regarding the Tween Bridge Solar Farm project. NLC is one of the two host authorities for this project; however, the council unfortunately missed the deadline for registration as an Interested Party and for submission of initial Relevant Representations on 2 January. I would like to confirm that as a host authority NLC do intend to play an active role in the examination of this project and that we are currently in the process of reviewing the application documents to allow us to produce a detailed Local Impact Report. To assist the Examining Authority (ExA) in forming its initial assessment of principal issues in advance of the preparation of the draft examination timetable, and ahead of the submission of our Local Impact Report, NLC wishes to make the following initial representation to identify its main areas of interest at this stage in relation to the Development Consent Order application. NLC acknowledges that there is a recognised need and support for renewable and low carbon energy technology through national planning policy and that the proposed development would contribute towards the targets set for the UK's greenhouse gas emission reduction and increasing the country's energy supply from more renewable sources. Notwithstanding this 'in principle' national policy support, the impacts of the proposal must be fully assessed in order to complete a full, fair and detailed planning balance assessment, and the benefits associated with the production of renewable energy and the policy support in this regard needs to be balanced against any potential environmental impacts associated with the development.</p> <p>At this initial stage, NLC considers that the main issues arising from the proposed project are as follows: Landscape and Visual impacts Cultural Heritage and archaeology Loss of Best and Most Versatile agricultural land Ecology and nature conservation Transport Socio-economic impacts With regards to local planning policy, the Application Site is not allocated for development as part of the Development Plan for North Lincolnshire and is located predominantly outside of defined development boundaries. Additionally, part of the site is located within the Isle of Axholme Area of Special Historic Landscape interest, which is important for it's significant areas of medieval open strip fields and turbaries, both of which are considered to be of national importance. North Lincolnshire Council will, at the required time, be producing a Local Impact Report which will set out its position in full on the above and its view on the broader planning issues relating to this DCO application.</p> <p>In addition to the above comments I can confirm that NLC share the concerns that have been raised by City of Doncaster Council in respect of the level of communication and engagement on this project. I apologise for the delay in providing this initial representation on the project and hope that you can accept this late response on behalf of NLC and can confirm that the council has been registered as an Interested Party and provide a unique ID for use in future</p>	<p>The Applicant agrees with NLC opening remarks and welcomes receipt of their Local Impact Report.</p> <p>The Applicant contests NLC's remark regarding the level of communication and engagement on the project. The Consultation Report [APP-026] clearly outlines the pre-application consultation undertaken. Engagement from each discipline is also summarised at the beginning of the respective chapters in the Environmental Statement.</p> <p>A PPA with NLC has also now been signed and NLC have appointed an external planning consultant – Paul Skelton Planning – to act on their behalf. The Applicant has since had a meeting with Paul Skelton to discuss the proposals and ensure there is an open line of communication on the project.</p>

	correspondence. Please do not hesitate to contact me should you need to discuss this matter further.	
--	--	--

4 Table 4-1 Environment Agency

Consultee	Representation	Applicant's Response
Environment Agency	<p>1.0 The Environment Agency's Role</p> <p>1.1 The Environment Agency is an executive non-departmental public body, established under the Environment Act 1995.</p> <p>1.2 We were established to bring together responsibilities for protecting and improving the environment and to contribute to sustainable development. We take an integrated approach in which we consider all elements of the environment when we plan and carry out our work. This allows us to advise on the best environmental options and solutions, taking into account the different impacts on water, land, air, resources and energy.</p> <p>1.3 We help prevent hundreds of millions of pounds worth of damage from flooding. Our work helps to support a greener economy by protecting and improving the natural environment for beneficial uses, working with businesses to reduce waste and save money, and helping to ensure that the UK economy is ready to cope with climate change. We will facilitate, as appropriate, the development of low carbon sources of energy ensuring people and the environment are properly protected.</p> <p>1.4 We have three main roles:</p> <ul style="list-style-type: none"> • We are an environmental regulator – we take a risk-based approach and target our effort to maintain and improve environmental standards and to minimise unnecessary burdens on businesses. We issue a range of permits and consents. • We are an environmental operator – we are a national organisation that operates locally. We work with people and communities across England to protect and improve the environment in an integrated way. We provide a vital incident response capability. • We are an environmental adviser – we compile and assess the best available evidence and use this to report on the state of the environment. We use our own monitoring information and that of others to inform this activity. We provide technical information and advice to national and local governments to support their roles in policy and decision-making. 	The Applicant has noted the Environment Agency's comments.

	<p>1.5 The Environment Agency takes action to conserve and secure the proper use of water resources, preserve and improve the quality of rivers, estuaries and coastal waters and groundwaters through pollution control powers and regulating discharge permits.</p> <p>1.6 We have regulatory powers in respect of waste management and remediation of contaminated land designated as special sites. We also encourage the remediation of land contamination through the planning process.</p> <p>1.7 The Environment Agency is the principal flood risk management operating authority. It has the power (but not the legal obligation) to manage flood risk from designated main rivers and the sea. The Environment Agency is also responsible for increasing public awareness of flood risk, flood forecasting and warning and has a general supervisory duty for flood risk management. We also have a strategic overview role for all flood and coastal erosion risk management.</p>	
	<p>2.0 Scope of these Representations</p> <p>2.1 These Relevant Representations contain an overview of the project issues, which fall within our remit. They are given without prejudice to any future detailed representations that we may make throughout the examination process. We may also have further representations to make if supplementary information becomes available in relation to the project.</p> <p>2.2 We have reviewed the draft Development Consent Order ('dDCO') application, Environmental Statement ('ES') and supporting documents submitted as part of the above-mentioned application, following notification of its acceptance for Examination on 11 November 2025. Our comments below are presented using the document references and ES Chapter headings relevant to our remit.</p>	<p>The Applicant has noted the Environment Agency's comments.</p>
	<p>3.0 3.1 Draft Development Consent Order (Rev 2) [AS-002]</p> <p>3.1 Article 2 'Interpretation' We note that under the definition of 'permitted preliminary works', it includes at sub paragraph (e) remedial work in respect of any contamination. It is our view that the remedial works in respect of contamination should not be undertaken without prior approval from the relevant planning authority, following consultation with the Environment Agency. Please see paragraphs 3.8 & 8.4 below for further details on our reasons for this. We request that sub paragraph (e) is deleted from Article 2.</p>	<p>Para 3.1 – The drafting of “permitted preliminary works” has been included to ensure that there is a proportionate degree of flexibility available to the Applicant, since without this the carrying out of each of the activities comprised within the definition would be sufficient to require the submission of detailed plans for approval under Schedule 2 to the draft Development Consent Order [Document Reference 3.1 Revision 3]. This would be disproportionate to the nature of the works involved, which are, in each case, minor and are not expected to give rise to any significant environmental effects. The Applicant does not therefore consider that the EA's requested removal of paragraph (e) to be necessary or appropriate.</p> <p>The inclusion of “remedial works in respect of any contamination” in this definition is consistent with the majority of recently made solar DCO decisions, including the East Yorkshire Solar Farm Order 2025,</p>

		the West Burton Solar Project Order 2025 and Heckington Fen Solar Park Order 2025, and thus reflects a widely precedented approach.
	<p>3.2 Article 9 and Schedule 13, Part 5, For the protection of the Environment Agency</p> <p>The Environment Agency notes the proposed disapplication of Regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016 ('EPR') (requirement to obtain a flood risk activity permit), in Article 9 of the dDCO. We will only agree to this disapplication if the wording of the Protective Provisions can be agreed. The Applicant has included draft Protective Provisions in Schedule 13, Part 5 for the protection of the Environment Agency. However, these are not in our standard format. We will work with the Applicant to try and agree on Protective Provisions that are acceptable to us during the examination.</p>	The Applicant and the Environment Agency have now agreed a set of protective provisions for the benefit of the Environment Agency which are included at Schedule 14, Part 5 of the Draft DCO [Document Reference 3.1 Revision 3] .
	<p>3.3 Schedule 2, Part 1, Requirement 7 (Fire Safety Management)</p> <p>This document appears to secure mitigation measures to manage potential safety risks presented by the Battery Energy Storage System ('BESS') and its operation/maintenance. We understand that this includes identification of environmental impact and risks. We, therefore, request that we are included as a specific consultee for the Battery Fire Safety Management Plan ('BFSMP') approval, to allow us to advise on any environmental risks within our remit.</p>	The Applicant has included the EA as a consultee in respect of this requirement, for matters relevant to its functions, in the latest iteration of the Draft DCO [Document Reference 3.1 Revision 3] submitted at Deadline 1. Please note that this plan is now titled the "Battery safety management plan".
	<p>3.4 Schedule 2, Part 1, Requirement 8 (Landscape and Ecology Management Plan)</p> <p>The outline Landscape and Ecology Management Plan ('oLEMP') [APP-181] includes procedures and mitigation measures relevant to issues in the Environment Agency's remit. We, therefore, request that we are included as a specific consultee to Requirement 8 to allow us to advise on matters within our remit prior to its discharge.</p>	The Applicant has included the EA as a consultee in respect of this requirement, for matters relevant to its functions, in the latest iteration of the Draft DCO [Document Reference 3.1 Revision 3] submitted at Deadline 1.
	<p>3.5 Schedule 2, Part 1, Requirement 11 (Surface and foul water drainage)</p> <p>We welcome our inclusion as a specified consultee to the discharge of this Requirement.</p>	The Applicant has noted the Environment Agency's comments.
	<p>3.6 Schedule 2, Part 1, Requirement 14 (Construction Environmental Management Plan)</p> <p>We have reviewed the outline Construction Environmental Management Plan ('oCEMP') [APP-176] and this requirement secures that a final Construction Environmental Management Plan for each phase of development will be submitted and approved by the relevant planning authority/authorities prior to its commencement. The Environment Agency would like to be consulted on the final plans to ensure that the risks posed to controlled waters are fully addressed and therefore we request to be listed as a specific consultee.</p>	The Applicant has included the EA as a consultee in respect of this requirement, for matters relevant to its functions, in the latest iteration of the Draft DCO [Document Reference 3.1 Revision 3] submitted at Deadline 1.
	<p>3.7 Schedule 2, Part 1, Requirement 19 (Decommissioning and restoration)</p>	3.7 The Applicant has included the EA as a consultee in respect of this requirement, for matters relevant to its functions, in the latest

	<p>Decommissioning and restoration of the site will involve issues within the Environment Agency’s remit, such as protection of the water environment and waste management. We, therefore, request that we are included as a specific consultee to the discharge of this requirement to enable us to advise on matters of interest in line with guidance and best practice (in force at that time) prior to decommissioning.</p>	<p>iteration of the Draft DCO [Document Reference 3.1 Revision 3] submitted at Deadline 1.</p>
	<p>3.8 Schedule 2, Part 1 – request for additional Requirement (Land contamination & groundwater)</p> <p>As mentioned briefly in paragraph 3.1 above, it is the Environment Agency’s view that works to remediate land contamination should not be included as a ‘permitted preliminary work’. This is because the Environment Agency would need to assess that such works would not cause a risk of pollution to the water environment, prior to the works taking place. Please also see paragraphs 6.2 – 6.5 below for additional technical justification for this request. We, therefore, request the inclusion of an additional Requirement to read:</p> <p>Land contamination</p> <p>(1) No phase of the authorised development shall commence until a contamination investigation and assessment report (including details regarding UXO where relevant) applicable to that phase, together with a written remediation strategy if applicable to deal with any contamination discovered, which is likely to cause significant harm to persons or pollution of controlled waters or the environment has been submitted to and approved by the relevant planning authority, following consultation with the Environment Agency on matters related to its function. (2) In the event that any unexpected contamination is discovered during the construction of any part of the works, the part of the works to which the contamination relates must cease until a site investigation and assessment report applicable to that part and, if necessary, a remediation strategy to deal with any contamination which is likely to cause significant harm to persons or pollution of controlled waters or the environment has been submitted to and approved by the relevant planning authority, following consultation with the Environment Agency on matters related to its function. (3) Any remediation required pursuant to sub-paragraphs (1) or (2) must be carried out in accordance with the remediation strategy approved pursuant to sub-paragraphs (1) or (2) unless otherwise approved by the relevant planning authority. (4) Any verification report required by a remediation strategy approved pursuant to sub-paragraphs (1) or (2) must be submitted to the relevant planning authority in accordance with that remediation strategy.</p>	<p>The Applicant does not consider this additional requirement to be necessary. The Applicant has included measures to ensure that any unsuspected contamination is appropriately addressed.</p> <p>The breadth of measures committed to is set out in the Commitments Register [APP-185]. These include:</p> <ul style="list-style-type: none"> • Commitment 19: Should any contaminated material be discovered, this will not be used on-site and will be dealt with in line with the process detailed in the Site Waste Management Plan that would support the CEMP. • Commitment 22: Phase 2 intrusive investigation to assess soil and groundwater contamination and mitigation to key receptors. This includes chemical assessment of topsoil and subsoil. • Commitment 123 sets out the measures that will be taken in relation to the responsible use and storage of hazardous materials/substances. • Commitment 126 sets out the measures that will be taken in relation to contamination involving waste materials. • Commitment 127 sets out the measures to be employed should unexpected contamination be discovered. • Commitments 173, 175 and 176 sets out measures that the DEMP will include in relation to contamination including: procedures to manage and mitigate against contaminated land and include emergency procedures to manage accidental spillages and leaks and contaminated land risks as well as mechanisms for reporting contamination and managing contamination. <p>These measures are set out in the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2] and the Outline Decommissioning Environmental Management Plan [Document Reference 7.3 Revision 2] which are secured by Requirement 14 and 19, Schedule 2 of the Draft DCO [Document Reference 3.1 Revision 3] respectively. As requested, the</p>

		<p>Environment Agency is now included as a consultee in respect of prospective applications for the discharge of these requirements. The Applicant considers that the existing requirements afford the Environment Agency sufficient oversight and control in relation to contaminated land. As such, the introduction of an additional requirement is unnecessary and would duplicate measures that are already secured and capable of being influenced by the Environment Agency.</p>
	<p>3.9 Schedule 2, Part 1 – request for additional Requirement (Piling Risk Assessment)</p> <p>It is the Environment Agency’s view that there should also be an additional Requirement to secure a risk assessment and prior approval of works involving piling. This is because the Environment Agency would need to review the piling risk assessment to ensure that such works would not cause a risk of pollution to the water environment, prior to the works taking place. Please also see paragraph 8.2 below for additional technical justification for this request. We, therefore, request the inclusion of an additional Requirement to read:</p> <p>Piling and penetrative foundation design</p> <p>(1) No phase of the authorised development, which involves the use of piling or any foundation designs using penetrative method, shall commence until a method statement, informed by a piling risk assessment, based on hydrogeological information contained in the contamination investigation and assessment report, has been submitted to and approved by the relevant planning authority, following consultation with the Environment Agency on matters related to its function.</p> <p>(2) All piling and penetrative foundation works must be carried out in accordance with the approved method statement.</p>	<p>The Applicant does not consider this additional requirement to be necessary. The Applicant has already committed to carrying out a piling risk assessment if piling is required as part of the Scheme. This is set out at commitment 118 of the Commitments Register [APP-185] and the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2] which is secured by Requirement 14, Schedule 2 of the draft Development Consent Order [Document Reference 3.1 Revision 3]. As requested, the Environment Agency is now included as a consultee in respect of the discharge of requirement 14. Introducing an additional requirement would be unnecessary and would result in the duplication of this control and subject to the Environment Agency’s influence</p>
	<p>4.0 Book of reference [APP-021]</p> <p>4.1 The Environment Agency is aware that it is listed in Category 1 (as assumed owner, or reputed owner) for various plots in the Book of Reference. The Environment Agency is currently considering the potential impact the project may have on its land holdings and its ability to carry out its statutory undertakings. At this stage, therefore, the Environment Agency must object to any acquisition of land or rights in relation to its land interests until it has had a proper opportunity to assess the potential effects of the acquisitions sought by the Applicant. We will be carrying out this assessment and discussing this matter with the Applicant during the course of the Examination and we will update the Examining Authority on our position in due course.</p> <p>4.2 The Environment Agency is a statutory undertaker within the meaning at s.127(8)(a) of the Planning Act 2008. Section 165 of the Water Resources Act 1991 (as amended) sets out its</p>	<p>The Applicant notes this comment. The Environment Agency are in Category 1, Category 2, Part 2 and Part 3 as claimants. The Applicant welcomes further discussions with the Environment Agency in relation to its land interests and is liaising with the Environment Agency but notes that it has now reached agreement with the Environment Agency on protective provisions, which are included in the draft Development Consent Order [Document Reference 3.1 Revision 3]. These will ensure there is no detriment to the EA and its ability to carry out its statutory undertaking.</p>

	<p>powers to carry out flood defence and drainage works (to the extent that it has a power and not a duty).</p>	
	<p>5.0 Chapter 7: Ecology and Nature Conservation [AS-012]</p> <p>5.1 We have reviewed Chapter 7, together with the relevant Appendices. Paragraph 7.5.105 of Chapter 7 states that access tracks will utilise existing crossing points where possible to minimise impacts to habitats. The Chapter states that there will be 45 new culverts and Chapter 2: Scheme Description [APP-039] states that 125 locations are presumed to require either the creation of a new culvert or the reinforcement/widening of an existing culvert/bridge structure. It is not clear what the potential impacts of these works could be for habitats and we, therefore, advise that this issue is explored further.</p>	<p>The Applicant confirms that the location and design of access tracks and associated crossings have been developed to minimise impacts to habitats, including the use of existing crossing points where practicable.</p> <p>Potential impacts associated with culvert installation and upgrades, including temporary disturbance to habitats and species (e.g. riparian habitats and associated fauna), have been considered within the ES. These impacts will be minimised through embedded mitigation and construction best practice, secured through the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2]. This includes measures such as sensitive timing of works, pollution prevention, pre-commencement checks for protected species, and use of protected species licences where required.</p>
	<p>5.2 In accordance with Paragraphs 3.10.78 and 3.10.79 of the National Policy Statement for Renewable Energy Infrastructure (EN-3), the culverting of existing watercourse/drainage ditches should be avoided, and where culverting for access is unavoidable, it should be demonstrated that no reasonable alternatives exist.</p>	<p>It is the Applicant's intention to utilise existing culvert crossings and/or bridge structures where possible within the site and construct new culvert crossings where this has been identified to be necessary through detailed design survey work. The locations of the culvert crossings within the Order Limits can be seen in ES Figure 2.5: Indicative Culverts Crossing Plan [APP-138].</p>
	<p>5.3 Appendix 7.6: Otter and Water Vole Survey [APP-077]</p> <p>We have reviewed the Otter and Water Vole Survey and agree with the recommendations for relevant mitigation using licenced ecologists. We would support improvements to the watercourses being made, in terms of water vole habitat, such as varying the bankside habitat to improve cover. We advise that sensitive maintenance measures are incorporated to ensure water vole are not impacted yet their habitat is improved. We would like to encourage the Applicant to work with the Waterlife Recovery Trust in supporting their mink trapping programme to ensure that water vole populations are strengthened along with other wildlife populations which are prey to mink.</p>	<p>The Applicant confirms that appropriate maintenance measures will be incorporated to ensure that water vole are not adversely affected, whilst delivering enhancements to bankside habitat (e.g. improved structural diversity and cover). Full details of these measures will be set out within the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2].</p> <p>The Applicant also welcomes the suggestion to support wider conservation initiatives and will work with the Waterlife Recovery Trust to support ongoing mink control measures, recognising the importance of mink management in strengthening water vole populations and other vulnerable species. Further detail on this commitment is provided within the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2]</p>

	<p>5.4 Appendix 7.12: Biodiversity Net Gain Assessment [APP-082]</p> <p>We consider that the Biodiversity Net Gain Assessment misses potential opportunities to improve watercourses within the scheme's boundary and it is unclear where the 10% watercourse net gain will be achieved. Given the large area of land covered by the scheme, we would support that further opportunities are taken to provide improvements to the watercourses present.</p>	<p>The Applicant confirms that there are opportunities to deliver enhancements to watercourses across the Order Limits. These measures will include improvements to bankside habitat structure, vegetation management, and measures to improve channel condition.</p> <p>In addition, the cessation of intensive arable practices within the Order Limits will reduce nutrient inputs and physical disturbance to watercourses, which is anticipated to improve water quality and overall condition of aquatic habitats.</p> <p>The Applicant notes that the Relevant Representation provided by City of Doncaster Council acknowledges that 'the cessation of agricultural inputs and physical disturbance from ploughing and harrowing will have a beneficial impact on water quality', which further supports the conclusions of the assessment.</p>
	<p>5.5 The BNG Metric Calculator was not included within the Biodiversity Net Gain Assessment and therefore based on the information provided within the Assessment, is not clear whether the unit calculations are correct or achievable. In relation to the Watercourses Module specifically, there is no indication how changes to existing culverts and the creation of new culverts will be mitigated or what extent of ditch management is required to achieve a 10% net gain. We strongly recommend that this is further considered.</p>	<p>The full metric calculation has been provided by the Applicant to the EA.</p> <p>In relation to the Watercourses the current assessment adopts a precautionary approach, with the potential impacts of new and modified culverts, and associated management requirements accounted for within the metric on a worst-case basis where appropriate.</p> <p>The Applicant confirms that any losses or degradation of watercourse condition will be mitigated through targeted enhancements, including new native planting, improved management and the cessation of impacts from agricultural activities.</p>
	<p>6.0 Chapter 9: Ground Conditions [APP-046] 6.1 We have reviewed Chapter 9: Ground Conditions and the relevant appendices in respect of the protection of controlled waters only. Based on the information available, the site is in an area of environmental sensitivity for groundwater but is understood to be predominantly greenfield in nature.</p> <p>6.2 The provided Factual Ground Investigation by Donaldson Associates, dated June 2009 (with site work undertaken between February 2009 and April 2009) [APP-107], has been used to inform the Phase 1 Ground Conditions Desk Study in respect of Land Parcel A [APP-097]. We consider this to be too old to be accepted in relation to the site, given the length of time which has elapsed since it was written (16 years ago). Ground conditions and in particular groundwater</p>	<p>The Applicant notes that the Ground Investigation by Donaldson dated June 2009 [APP-107] only forms part of the baseline studies for the Order Limits and this is accompanied by ES Appendix 9.1 Phase 1 Ground Conditions Desk Study reports for Land Parcels A to E [APP-100 to APP-106], which together form the basis of a robust and contemporary assessment of risks posed by sources of contamination beneath the site. As noted, and acknowledged in Para 6.3 of the response, the Applicant is proposing to complete a programme of suitably targeted ground investigation works across the across the Order Limits prior to construction. Such pre-commencement Phase 2 Geo-Environmental investigations are</p>

<p>levels and quality may have changed significantly and therefore this should be considered and factored into further risk assessments.</p> <p>6.3 Potential contaminant linkages are identified within Section 7.3: Preliminary Risk Assessment, of the Phase 1 report, which goes on to state that these linkages should be assessed further through site investigation into the Environmental Statement post consent. Paragraph 9.3.22 of Chapter 9 states that ‘Specific targeted contamination investigation at critical locations during detailed design stage is proposed, in combination with geotechnical investigation for foundation design and directional drilling’.</p> <p>6.4 Paragraph 9.5.10 states that “Preliminary and Detailed UXO risk assessments from a specialist are to be obtained”. Many UXO items contain compounds that can leach into soil if the casing corrodes; these can migrate into groundwater. It is important that the findings of UXO risk assessment are included, where appropriate, within the general site investigations and risk assessments.</p> <p>6.5 It is important that these further investigations, together with any remediation, are secured in the DCO. Accordingly, as referenced in paragraphs 3.1 and 3.8 above, we request that an additional Requirement is added to Schedule 2, Part 1, to secure the undertaking of this work and provide the Environment Agency and the relevant planning authority with an opportunity to comment on and approve any remediation works found to be necessary.</p>	<p>secured by the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2], which is in turn secured by Requirement 14 of the Draft Development Consent Order [Document Reference 3.1 Revision 3].</p>
<p>7.0 Chapter 10: Water resources [APP-047]</p> <p>7.1 We have reviewed Chapter 10: Water Resources and the relevant appendices in relation to the protection of controlled waters; flooding from tidal and fluvial sources and proposed drainage for the BESS, only. We have specific comments on the Flood Risk Assessment (FRA) and Water Framework Directive Assessment below. At this stage, the Environment Agency raises two holding objections in respect of: a) the proposed drainage for the BESS, due to concerns regarding risk to the environment, as explained in paragraphs 7.10–7.11 below. b) the additional information required to demonstrate that there will be no increase in flood risk on third parties resulting from the access track construction in the River Torne floodplain, as explained in paragraphs 7.5–7.7 below.</p> <p>7.2 Please note that the Lead Local Flood Authorities (City of Doncaster and North Lincolnshire) and any relevant Internal Drainage Boards should also be consulted for advice on the risk of flooding from groundwater, drainage systems, reservoirs, canals or ordinary watercourses.</p>	<p>The Applicant’s position and response to the two holding objections are set out below.</p>
<p>7.3 We note that Table 10.3 identifies private water supplies as a receptor. However, to ensure that these are appropriately protected, specific private water supplies should be identified now and used to inform the Environmental Statement. We advise that identification of private water supplies should not be delayed as these will need to be known prior to, and feed into, any further ground/contamination investigations.</p>	<p>The Applicant’s position is that the assessment of private water supplies is to be completed post DCO, and this is secured by Requirement 14 of the Draft Development Consent Order [Document Reference 3.1 Revision 3]. The Applicant is keen to undertake further engagement with the Environment Agency to reach an agreement.</p>

	<p>7.4 Appendix 10.1: Flood Risk Assessment (Part 1 and 2) [APP-108 & APP109]</p> <p>Paragraph 5.18 and Appendix A (A9) refers to Flood Zone 3b (functional floodplain) as the 1 in 30 year event for both the River Trent and River Torne. This was previously agreed, in February 2025, during pre-application discussions, as shown in Appendix E of the FRA. However, since that time the River Trent 2023 model has been reviewed (during the summer of 2025) and the 1 in 30 flood extent no longer impacts the site. Therefore, the modelled 1 in 30 River Trent extent can be excluded from the definition of Flood Zone 3b and it should be defined based on the River Torne 1 in 30 extent only.</p>	<p><u>Paragraph 7.4 – Flood Risk Assessment</u></p> <p>The ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2] and associated appendices have been updated and submitted alongside this document at Deadline 1. All references to the 1 in 30-year flood extent has been removed as defined by River Trent model when defining the extent of Flood Zone 3b on site. The extent of Flood Zone 3b is now defined using the 1 in 30-year flood extent from the 2025 River Torne model only, showing a reduction in the extent of functional floodplain on site. The removal of the 1 in 30-year flood extent defined by the River Trent when defining Flood Zone 3b on site will not change the conclusions of the ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2].</p> <p>As detailed in Paragraph 5.20 of the ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2], the Scheme is generally considered to have a negligible impact on existing floodplain storage, and this will remain the case with the reduced extent of Flood Zone 3b on site. The Environment Agency confirmed during a meeting held on the 1st April 2026 that they are content that their advice to date with regards to Flood Zone 3b still stands, noting the reduced Flood Zone 3b extent on site. The Applicant acknowledges the EA's comments about raised access tracks and the impact on flood flows and storage and note that these concerns are under discussion with the Environment Agency.</p>
	<p>7.5 Paragraphs 5.20 and 5.22 consider the potential impact of development on floodplain storage. The FRA only considers the potential impact with regard to Flood Zone 3b, concluding that the impact of the scheme will be negligible. As previously advised in our Preliminary Environmental Impact Report ('PEIR') response, the loss of floodplain should be calculated up to the 1% annual exceedance probability (AEP) plus climate change flood event, for the River Torne. It should therefore be considered for Flood Zone 3a as well as Flood Zone 3b.</p>	<p>The ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2] and associated appendices have been updated and submitted alongside this document at Deadline 1. The updated document assesses the impact of the development on floodplain storage using the 2025 River Torne 1 in 100 year plus climate change modelled flood extent as a minimum, rather than the 1 in 30-year extents. During a meeting held on 1 April 2026, the Environment Agency noted they are content that the use of the 1 in 100 year plus climate change extent would not impact the conclusions of the ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2], with the exception of any raised access tracks which are subject to ongoing discussions.</p>

	<p>7.6 Appendix C drawing reference: 'Figure 2.6, Typical Access Track, Rev 1' shows two 'No-dig (non-intrusive)' access track options that will involve the raising of tracks to 0.35/0.4m above the existing ground level. Whilst we acknowledge that the access tracks will be permeable by nature, we consider that there could be a potential impact on flood flows and flood storage. This does not appear to have been considered in the FRA. The FRA concludes that there will be negligible impact on the existing floodplain storage, however, this conclusion has not been fully explained/justified. Further details to support this conclusion and demonstrate that the worst-case scenario has been assessed should be provided. This must demonstrate that there will be no impact to third parties from the proposed development.</p> <p>7.7 Alternatively, we would support a commitment in the FRA that any access tracks in the River Torne 1% AEP plus climate change flood extent will not be raised above the ground level, as shown in Figure 2.6 as the 'typical access' options. If the Applicant is able to confirm that there will be no raising of tracks within the relevant River Torne extent, this will resolve our holding objection in respect of the potential increase in flood risk to third parties.</p>	<p>The areas where access tracks may be raised within the 2025 Torne 1 in 100 year plus climate change extent are minimal and currently impact just 2 locations, with the associated impact on floodplain storage being minimal. During a meeting held on 1 April 2026, the Environment Agency agreed that any access track raising is likely to have a minimal impact on storage but requested some additional context of the two areas currently expected to be impacted. This information has been sent to the Environment Agency. The Applicant will continue to discuss this with the Environment Agency.</p>
	<p>7.8 Table 10-2 of Chapter 10 and paragraphs 5.29-5.39 of the submitted FRA address the Critical Flood Level (CFL) which is a residual flood risk recommended in the North and North East Lincolnshire Strategic Flood Risk Assessment (SFRA). Whilst we acknowledge that it is an unlikely event, we do highlight it as a recommendation of the SFRA. The FRA does not propose to raise critical equipment above the CFL. In terms of meeting the requirement of the National Policy Statement EN-1, which outlines that development must be designed and constructed to remain operational time of flood, we defer to the Examining Authority/Secretary of State to decide whether this approach is acceptable with respect to managing residual risk.</p>	<p>The Critical Flood Level of 4.1mAOD within the Order Limits has been a well discussed issue. The Applicant's position is that it is not possible to raise critical equipment above this level (noting existing ground levels of approximately -0.2mAOD and 2.6mAOD). The Environment Agency defer to the Examining Authority/Secretary of State to decide whether the approach is acceptable with respect to managing residual flood risk.</p> <p>During a meeting held on 1 April 2026, the Environment Agency noted they would not object on the basis that mitigation measures are not designed against the Critical Flood Level but wanted to flag the residual risk and noted it would be helpful to receive further justification why mitigation to the Critical Flood Level would not be possible. This further information has been included in the updated Flood Risk Assessment submitted at Deadline 1. The Environment Agency are content with the use of the 1 in 1,000 year flood level plus 100mm freeboard to design mitigation measures. The Applicant refers to the updated ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2] submitted at Deadline 1 which provides further information about why providing flood risk mitigation measures against the Critical Flood Level is not possible and necessary for the Scheme.</p>
	<p>7.9 In response to previous comments raised by the Environment Agency, it is stated on page 20 of Chapter 10: Water Resources, that it is not expected that containment of fire water will be in the form of a bund and instead it will be contained in below ground crates. Paragraph 7.21 of the FRA states that the gravel sub-base of the BESS will be lined with an impermeable liner. The FRA</p>	<p>The Outline Surface Water Drainage Strategy included in the ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2] has been designed to</p>

<p>outlines that 'In the event of a fire a penstock will be shut off in the downstream manhole to allow any water used to fight the fire to be contained within the below ground network ready to be pumped off once the fire is out'. The FRA notes that the final design will be refined at the detailed design stage.</p> <p>7.10 We have concerns regarding this approach and whether it will offer adequate protection of controlled waters. It is not clear what the design and composition of the crates will be or whether the compound will be durable and resistant enough to withstand any potential contaminants that could be present. We would also expect to see details regarding the management and maintenance of containment measures to ensure that the measures will protect the water environment over the lifetime of the development.</p> <p>7.11 We consider that it is best practice to store any potentially contaminated effluents above ground to minimise the risk of environmental impact. Whilst underground storage may not necessarily be unacceptable, we would require further information relating to construction materials and design to fully assess its suitability. We request that further detailed information is provided to demonstrate that the proposed design and materials to be used are suitable and robust for use in the proposed development.</p> <p>7.12 Appendix 10.2: Water Framework Directive Assessment [APP-110]</p> <p>Overall, we are satisfied that the approach of the Water Framework Directive Assessment to scoping in/out of waterbodies and activities is appropriate. However, we have concerns regarding the proposed BESS drainage, as per our comments above. We agree with the statement in Table 6.2, that without mitigation, the WFD watercourses could be impacted due to the migration of pollutants in the event of a fire. Currently, the application has not adequately demonstrated that the proposed BESS drainage system will adequately mitigate the risk to controlled waters. Until additional information is provided, we are of the view that there is a risk that the water environment could be impacted from the migration of pollutants in the event of a fire. Therefore, we cannot currently agree with the conclusions of the WFD Assessment.</p> <p>7.13 Section 6.4 of the Assessment proposes that 'Any new bridges or culverts will be designed to ensure flow capacity is maintained and access is retained to the watercourse for maintenance'. We recommend that the bed of any culvert should be buried beneath the riverbed (normally by a minimum of 150mm) to ensure no step change in channel bed height. Given the depositional environment of the ditches and rivers in this area, this measure would assist in reducing maintenance by increasing capacity. We also advise that further best practice, for the inclusion of clear span bridge structures, wherever possible, should be considered.</p>	<p>manage contaminated fire water. Engagement with the Environment Agency about the design is ongoing.</p> <p>An Operation and Maintenance Manual for the Outline Surface Water Drainage Strategy has been prepared and is included in the ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2].</p>
<p>8.0 Document 7.1 Outline Construction Environmental Management Plan [APP-176]</p> <p>8.1 Throughout the Environmental Statement, buffer zones for watercourses are proposed for reasons including maintenance [APP-108], water quality protection [APP-110] and ecological mitigation [AS-012]. We note that the outline Construction Environmental Management Plan ('oCEMP') states that 'Watercourse and defence easements will be identified in the Construction</p>	

<p>Environmental Management Plan and adhered to by the Principal Contractor and no construction will be undertaken within the relevant easement.'. We support this measure and request that the final CEMP includes details on how this will be implemented on the site.</p> <p>8.2 Page 51 refers to a Piling Risk Assessment being prepared if piling is required as part of the scheme. This Assessment should be written in accordance with Environment Agency guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. National Groundwater & Contaminated Land Centre report NC/99/73". We request that this guidance is explicitly referenced in the oCEMP for the avoidance of doubt. The site- specific piling risk assessment should be based on hydrogeological information and a contamination investigation and assessment report (which includes a site investigation). It is our view that the need for a Piling Risk Assessment, if required, should be secured in Schedule 2, Part 1 of the dDCO to ensure that appropriate control and consultation on its contents is undertaken prior to the commencement of such works. Please see paragraph 3.9 above requesting this as an additional Requirement.</p> <p>8.3 Page 52 of the of the oCEMP states that if any monitoring relating to groundwater or contaminated land is necessary, the requirements will be discussed with the East Riding of Yorkshire Council. This should be corrected to the relevant planning authority for this scheme. As per our recommendations for a requirement relating to land contamination, we request that the oCEMP also refers to the Environment Agency being involved in discussions on this matter.</p> <p>8.4 Page 62 outlines a procedure should unexpected contamination be discovered. This procedure is not adequate as the Environment Agency (and the relevant planning authority) would not be given an opportunity to review the investigation and control measures to be taken to ensure the contamination is adequately dealt with and does not lead to pollution. We have therefore set out in paragraph 3.8 above a Requirement for Schedule 2, Part 1 of the dDCO to secure the required procedure and consultation, should unexpected contamination be discovered.</p>	<p>The Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2] has been updated and submitted at Deadline 1 to remove reference to East Riding of Yorkshire and include both City of Doncaster Council and North Lincolnshire Council. The document has also been amended to include the Environment Agency as being involved in the discussions on the matter, together with a reference to the Environment Agency guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. National Groundwater & Contaminated Land Centre report NC/99/73".</p>
<p>9.0 7.3 Outline Decommissioning Environmental Management Plan (Rev 1) [APP-178]</p> <p>9.1 The outline Decommissioning Environmental Management Plan ('oDEMP') states that best practice measures will be adhered to in the decommissioning of the scheme, which we support.</p> <p>9.2 Paragraph 3.2.2 of the oDEMP states that 'It is assumed that all the belowground cables will be left in situ to avoid unnecessary disturbance to the ground or to nearby human or ecological receptors'; however, paragraph 3.8.1 states that 'cabling above 1m below ground (on and off site) (any cabling buried 1m+ below ground will not be removed at decommissioning)'. We advise that the oDEMP clarifies whether it is intended, at this stage, to remove some or none of the cabling at the decommissioning phase, with consideration for the harm/benefits which may arise in line with Paragraph 2.10.69 of the National Policy Statement for Renewable Energy Infrastructure (EN-3).</p>	<p>The Outline Decommissioning Environmental Management Plan [Document Reference 7.3 Revision 2] has been updated and submitted at Deadline 1 to amend the text in relation to the removal of underground cables.</p> <p>It is the Applicant's intention to utilise existing culvert crossings and/or bridge structures where possible within the site and construct new culvert crossings if necessary. The locations of the culvert crossings within the Order Limits can be seen in ES Figure 2.5: Indicative Culverts Crossing Plan [APP-138].</p>

	<p>9.3 It is not clear whether it is intended to leave the 45 proposed culverts in place or whether they will be removed during the decommissioning phase of the scheme. It is unclear whether some of the proposed culverts will be required for the construction phase of development only, or whether some/all the culverts will be required for both the construction and operational phases of development. Paragraphs 10.5.11 and 10.5.22 of Chapter 10 [APP-047] acknowledge that culverts have the potential to impact existing flow patterns of watercourses and assigns a significance of effect of 'Moderate Adverse (Significant)'. Culverts also impact the morphology of watercourses and aquatic habitats. We request that if culverts remain in place throughout the lifetime of the development, then the removal of these is fully explored at decommissioning stage to minimise the impacts on morphology and habitats. We request that a commitment to consider this is included in the oDEMP.</p>	
	<p>10.0 Outline Battery Safety Management Plan (Rev 1) [APP-179]</p> <p>10.1 We have reviewed the outline Battery Safety Management Plan ('oBSMP'), which includes the aim of ensuring that the risk to the environment during construction, operation and decommissioning, and the safety features and additional safety recommendations to mitigate these are identified.</p> <p>10.2 On page 11 of the oBSMP, the Applicant mentions the National Fire Chiefs Council (NFCC) recommendations regarding environmental impact by outlining that a drainage strategy will be developed post-consent, in consultation with the Environment Agency. However, we consider that this is insufficient to satisfy the NFCC recommendations and the oBSMP should further consider and detail the potential environmental impact and risk in the event of a fire. This is particularly important given the concerns outlined above in respect of the proposed gravel base and below grounds crates etc.</p> <p>10.3 In particular, the oBSMP should consider the potential effect of the release of firewater from the BESS compounds on groundwater quality. Highly polluting chemicals in batteries could enter the water environment (groundwater and surface water) in firewater or rainfall should battery containers become exposed in the event of a fire. While in the event of a fire at a BESS, it is accepted best practice to let the containers on fire burn out, it is likely water will be used to cool neighbouring containers. This water could enter burning containers through surface water run off or directly from spray cooling neighbouring containers. Furthermore, during or following a fire at a BESS development, water could enter exposed containers through rainfall during the period of time it takes to remove or cover burnt containers.</p>	<p>The Outline Battery Safety Management Plan [APP-179] is secured via Requirement 7 of the Draft Development Consent Order [Document Reference 3.1 Revision 3], which states that the no part of Works No. 5 must commence without a detailed battery safety management plan being submitted to and approved by the local planning authorities following consultation with South Yorkshire Fire and Rescue or Humberside Fire and Rescue Service. As such, consultation on all matters of the detailed battery safety management plan will be undertaken, including on the proposed drainage strategy.</p> <p>Water would be used only to cool areas adjacent to a BESS container to prevent fire spread; water will not be used to suppress a battery fire within a BESS container which will be suppressed using gas or aerosol-based fire suppression (see above). This approach will avoid the risk of firewater runoff becoming contaminated with chemical substances contained in the batteries.</p> <p>The use of internal non-water-based suppression would mean that in the event of a fire, it is likely that that contaminants released or spilled would settle locally within the battery unit. It is therefore unlikely that they would be mobilised to the local water environment.</p> <p>Academic research and laboratory experiments have concluded that in the event of a lithium-ion cell fire several chemicals in gaseous form can be released and the composition and concentration of the off-gases include CO, CO₂, HF, Oxygen and Hydrogen. The only UK BESS fire that was monitored was the Carnegie Road, Liverpool (Sept 2020). At this incident the HMEPO was present and called upon the services of an impartial scientific consultancy to determine the</p>

		<p>impact of the water runoff and smoke emitted from the fire. It was found that the fire run-off water was to be a low alkaline level, as opposed to acidic, the proposed theory being that any HF in the water had been subject to significant dilution and the alkaline reading a product of the limestone-based gravel surrounding the BESS units. The composition of the plume was determined as being negligible in toxic gas concentration. Further to this the recent fire at Moss Landing California (Feb 2025), was monitored at 1 second intervals for toxic substances in the smoke plume. It was established that the composition of the plume emanating from the fire was within US Air Pollution limits.</p>
	<p>11.0 7.6 Outline Landscape Ecological Management Plan (Rev 1) [APP-181]</p> <p>11.1 We have reviewed the outline Landscape Ecological Management Plan ('oLEMP') and consider that it is not clear what the monitoring arrangements will be for post-construction. Section 6 of the oLEMP refers to the proposed monitoring arrangements for mitigation measures post-construction; however, these appear to be non-specific. We advise that the oLEMP should be more specific and clearer on the intended monitoring arrangements and provide indicative timescales for when monitoring results are likely to be submitted to the relevant local planning authority, if possible.</p>	<p>The Applicant confirms that future long-term monitoring will be completed in conjunction with BNG requirements as provided within the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2], submitted at Deadline 1.</p> <p>The Landscape and Visual Mitigation Strategy is set out at ES Figure 6.4 [Document Reference 6.4.6.4 Revision 2] this will form the basis for the detailed landscape proposals to be implemented and established under supervision by the Ecologist and Landscape Architect. This will be set out in the final LEMP and will include checking plant material, planting operations, assessing establishment and required replacements in addition to ecological monitoring.</p>
	<p>12.0 Flood Risk Sequential Test and Exception Test (Rev 1) [APP-186]</p> <p>12.1 We have reviewed the submitted Flood Risk Sequential Test and Exception Test document. The Environment Agency can provide advice on the relative flood risk between the proposed site and any alternative sites identified if the Examining Authority requests this. Our advice on the Exception Test relates to the second bullet point only (Paragraph 5.8.11 of the National Policy Statement for Energy EN-1), in respect of whether the proposed development will be 'safe' and not increase flood risk elsewhere.</p> <p>12.2 Paragraph 7.1.41 outlines that the FRA demonstrates that there will be no increase in flood risk as a result of the scheme and paragraph 7.1.46 concludes that the terms of the Exception Test have been met. As outlined in Section 7 of these representations, we are of the view that further work is required in relation to the impact of the scheme on flood storage and flood flows. We, therefore, advise that it is not considered that Part B of the Exception Test is passed until it has been satisfactorily demonstrated that there will be no increase in flood risk elsewhere.</p>	<p>The Applicant has reviewed the location of access tracks within the most recent River Torne 1% AEP plus climate change flood extent. The number of access tracks requiring raising is anticipated to be limited to a small number of locations (i.e. two locations), and therefore the impact on the floodplain is expected to be minimal.</p> <p>During a meeting held on the 1 April 2026, the Environment Agency agreed that any access track raising is likely to have a minimal impact on storage but requested some additional context of the two areas currently expected to be impacted. This information has been sent to the Environment Agency. The Applicant will continue to discuss this with the Environment Agency and outcomes will be presented within the SoCG.</p>
	<p>13.0 Statutory Undertakers Position Statement [APP-187]</p>	

	<p>13.1 The document states on page 6: 'Protective Provisions were issued on 4 July 2025, and a further updated set of Protective Provisions were issued on 9 July 2025. The Applicant awaits a response.'. We have reviewed our records and the Protective Provisions were initially sent to a retired colleague on 04 July 2025 and therefore were not received. They were then resent by the Applicant to our team inbox and received on 14 July. We sent our standard Protective Provisions on 15 July 2025 by email. We have had no further correspondence with the Applicant since our last email dated 15 July 2024 regarding the Protective Provisions.</p>	<p>The Applicant has agreed Protective Provisions with the Environment Agency. These are included at Schedule 14, Part 5 of the Draft DCO [Document Reference 3.1 Revision 3].</p>
	<p>14.0 Further representations</p> <p>14.1 In summary, we can confirm that we have no objection in principle to the proposed development, as submitted, and the holding objections outline above are capable of resolution. We will continue to work with the Applicant in respect of matters concerning the Environment Agency's landholdings and to agree on the wording of the Protective Provisions.</p> <p>14.2 We reserve the right to add or amend these representations, including requests for DCO requirements and Protective Provisions should further information be forthcoming during the examination on issues within our remit.</p>	<p>The Applicant notes this comment and will continue to work alongside the Environment Agency to resolve matters during the examination period.</p>

5 Table 5-1 Natural England Representation

Consultee	Representation	Applicant's Response
<p>Natural England</p>	<p>Summary of Natural England's Advice</p> <p>Natural England's Relevant Representations advice Natural England is not yet satisfied that it can ascertained beyond reasonable scientific doubt that the project would not have an adverse effect on the integrity of the following internationally designated sites.</p> <ul style="list-style-type: none"> - Humber Estuary Special Protection Area (SPA) - Humber Estuary Special Area of Conservation (SAC) - Humber Estuary Ramsar. - Thorne Moor SAC - Thorne and Hatfield Moors SPA <p>With regard to the above designated sites, Natural England considered that the Applicant has provided insufficient evidence and is not yet satisfied that the following issues have been addressed:</p> <p>Internationally designated sites</p> <ul style="list-style-type: none"> - Potential loss/ damage to designated habitats (NEO) ('amber') - Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA/Ramsar sites (NE1-NE6, NE8) ('amber') - Potential noise and visual disturbance impacts to functionally linked land for relevant qualifying bird features of the listed SPA/Ramsar sites (NE7) ('amber') - Potential lighting impacts to qualifying bird features of the listed SPA site (NE10) ('amber') - Potential hydrological impacts to SAC features (NE11) ('amber') - Potential air quality impacts to SAC features (NE12-NE13) ('amber') - Potential abstraction impacts resulting from Horizontal Directional Drilling (HDD) (NE14) - Potential water quality impacts during construction and operation (NE15-NE18) ('amber') - The in-combination assessment (NE19) ('amber'). 	<p>The Applicant has provided responses below to the detailed comments.</p>

Consultee	Representation	Applicant's Response
	<p>Nationally designated sites</p> <ul style="list-style-type: none"> - Potential impacts on the Humber Estuary SSSI designated features (NE20) ('amber') - Potential impacts on Thorne, Crowle & Goole Moors SSSI designated features (NE21) ('amber') - Potential impacts on the Hatfield Chase Ditches SSSI designated features (NE22) ('amber') <p>Natural England advises that further information is also required regarding the following issues.</p> <p>Protected Species</p> <ul style="list-style-type: none"> - Protected species – Otter (NE23a) ('amber') - Protected species – Badger (NE23b) ('amber') - Protected species – Bats (NE23c) ('amber') - Protected species – Great crested newt (NE23d) ('amber') - Protected species – Water vole (NE23e) ('amber') - Protected species – Breeding birds (NE23f) ('amber') <p>Biodiversity Net Gain (BNG)</p> <ul style="list-style-type: none"> - Approach to assessment (NE24a) ('grey') - Metric Trading Rules (NE24b) ('grey') - Management and Monitoring (NE24c) ('grey') <p>Soils and best and most versatile agricultural land</p> <ul style="list-style-type: none"> - Comments on Appendix 15.1: Agricultural Land Classification Report (NE25a) ('grey') - Comments on the Outline Soil Management Plan (NE25b) ('grey') <p>Biodiversity enhancement</p> <ul style="list-style-type: none"> - Advice regarding the management of solar farms to enhance biodiversity (NE26) ('grey') <p>Ancient woodland and ancient/veteran trees</p> <ul style="list-style-type: none"> - General advice (NE27) ('grey') <p>PART I: Summary and conclusions of Natural England's advice</p> <p>PART II: Natural England's detailed advice</p> <p>PART III: Natural England's comments on the Development Consent Order (DCO)</p>	

Consultee	Representation	Applicant's Response
	<p>Part I: Summary and conclusions of Natural England's advice</p> <p>1.1 Natural England's advice in these relevant representations is based on information submitted by RWE Renewables UK Solar and Storage Limited ('the Applicant') in support of its application for a Development Consent Order ('DCO') in relation to Tween Bridge Solar Farm ('the project').</p> <p>1.2 Natural England's comments are based on a review of the introductory chapters and topic-specific chapters most relevant to our statutory purpose.</p> <p>1.3 Natural England would like to highlight the following overarching comments on the ES at this stage:</p> <ul style="list-style-type: none"> • Multiple key issues previously raised by Natural England in response to the Preliminary Environmental Information Report (PEIR) have not been resolved in the ES. We would welcome further engagement with the Applicant to ensure that these issues can be progressed and resolved as soon as possible. • We have noted some inconsistencies between different documents. We would welcome clarity on the correct information and proposed approaches where such inconsistencies occur. • The Habitats Regulations Assessment (HRA) should be carried out in line with Defra guidance: Habitats regulations assessments: protecting a European site – GOV.UK The current shadow HRA (sHRA) does not clearly set out which impacts have been screened in for each relevant designated site. • All relevant mitigation measures identified for minimising impacts to internationally designated sites should be fully assessed in the sHRA and secured via the relevant plan. Where mitigation measures are proposed, the assessment should demonstrate what difference the mitigation measures would make to the effects of the proposal on the site. The assessment will need to demonstrate confidence in the effectiveness of the proposed mitigation measures and show: <ul style="list-style-type: none"> – how the measures would be implemented and monitored, and how long for – how the measures will be enforced – the level of certainty that the measures would work to avoid or reduce effects on the site – the level of expected success, and what changes would be made if monitoring shows the measures may fail <p>1.4 Part I of these representations summarises what Natural England considers the main issues¹ to be in relation to the DCO application, and indicate the principal submissions that it wishes to make at this point. Natural England will develop these points further as appropriate during the</p>	<p>The Applicant has provided responses below to the detailed comments.</p>

Consultee	Representation	Applicant's Response
	<p>examination process. Natural England may have further or additional points to make, particularly if further information about the project becomes available.</p> <p>1.5 Our comments are set out against the following sub-headings which represent our key areas of remit:</p> <ul style="list-style-type: none"> • Internationally designated sites • Nationally designated sites • Protected species • Biodiversity net gain • Soils and best and most versatile agricultural land • Ancient woodland and ancient/veteran trees <p>1.6 Our comments are flagged as red, amber, yellow, green or grey:</p> <p>Red are those where there are <u>fundamental concerns</u> which it may not be possible to overcome in their current form.</p> <p>Amber are those where further information is required to determine the impacts of the project and allow the Examining Authority to properly undertake its task and/or where further information is required on mitigation/compensation proposals in order to provide a sufficient degree of confidence as to their efficacy.</p> <p>Yellow are those where Natural England does not agree with the Applicant's position or approach. We would ideally like this to be addressed but are satisfied that for this particular project it is unlikely to make a material difference to our advice or the outcome of the decision-making process. However, we reserve the right to revise our opinion should further evidence be presented. It should be noted by interested parties that whilst these issues/comments are not raised as significant concerns in this instance, it should not be understood or inferred that Natural England would be of the same view in other cases or circumstances.</p> <p>Green are those which have been <u>successfully resolved</u> (subject always to the appropriate requirements being adequately secured).</p> <p>Grey are notes for Examiners and/or competent authority.</p> <p>1.7 Natural England has been working with consultants on behalf of RWE Renewables UK Solar and Storage Limited to provide advice and guidance on the Tween Bridge Solar Farm project since 2024 through Natural England's Discretionary Advice Service. Natural England has agreed to attend meetings with the Developer with a view to progressing Statements of Common Ground as part of the Examination process and to try to resolve outstanding issues ahead of the Examination.</p> <p>1.8 Part I provides an overview of the issues and a Summary of Natural England's advice. Part II contains Natural England's detailed comments regarding the main issues which it considers</p>	

Consultee	Representation	Applicant's Response
	<p>need to be addressed by the Secretary of State. Part III contains Natural England's comments on the draft Development Consent Order (DCO) and associated documents.</p> <p>1.9 Part II of these representations sets out all the significant issues which remain outstanding, and which Natural England advises should be addressed by RWE Renewables UK Solar and Storage Limited and the Examining Authority as part of the examination process in order to ensure that the project can properly be consented. These are primarily issues on which further information would be required in order to allow the Examining Authority properly to undertake its task or where further work is required to determine the effects of the project and to develop mitigation proposals and to potentially consider compensation proposals to provide a sufficient degree of confidence as to their efficacy.</p> <p>1.10 Natural England will continue discussions with RWE Renewables UK Solar and Storage Limited to seek to resolve these concerns and agree outstanding matters in a Statement of Common Ground. Failing satisfactory agreement, Natural England advises that the matters set out as 'amber' issues in Part I and II will require consideration by the Examining Authority as part of the examination process.</p> <p>1.11 Natural England's advice is that there are a number of matters which have not been resolved satisfactorily as part of the pre-application process that must be addressed by RWE Renewables UK Solar and Storage Limited and the Examining Authority as part of the Examination and consenting process before development consent can be granted, as summarised in Section 2 above and outlined in further detail in Part II below.</p> <p>1.12 Some of these matters are important enough to mean that if they are not satisfactorily addressed it would not be lawful to permit the project due to its impacts on SAC, SPA, Ramsar and SSSI interests. The specific concerns in relation to each are detailed in Part II</p>	
	<p>Part II: Natural England's Relevant Representations</p> <p>3. Natural England's detailed advice</p> <p>3.1 Part II, Table 1 of these representations expands upon the detail of all the significant issues ('amber' issues) which, in our view remain outstanding and includes our advice on pathways to their resolution where possible. Table 1 also shows 'green', 'yellow' and 'grey' issues. Please refer to Part 1 for definitions of these.</p> <p>3.2 Natural England will continue engaging with the Applicant to seek to resolve outstanding concerns through the Examination. Natural England advises that the matters indicated as 'amber' will require consideration by the Examining Authority during Examination.</p> <p>Table provided in Appendix 1.</p>	

Consultee		Representation			Applicant's Response	
		Natural England's Relevant Representations, Part II, Table 1				
NE key issue ref	Topic	Issue summary (C) – construction phase (O) – operational phase	NE commentary and advice on the further information required to enable assessment.	Risk Red, Amber, Green, Grey		
NEO	International designated sites <ul style="list-style-type: none"> Thorne Moor SAC Thorne and Hatfield Moors SPA	Potential loss/ damage to designated habitats (C) and (O)	Natural England notes from Ecology and Nature Conservation Chapter 7 that <i>'The Order Limits lies outside designated sites with the exception of a small 0.54ha area of Thorne & Hatfield Moors Special Protection Area (SPA), Thorne Moor Special Area of Conservation (SAC), Thorne, Crowle and Goole Moors Site of Special Scientific Interest (SSSI) and Hatfield Chase Ditches SSSI. Whilst the Thorne & Hatfield Moors SPA/SAC/SSSI lies within the Order Limits, they are outside the development footprint and this area is to be buffered from any development. Therefore no work is scheduled within these designated sites.'</i>	Amber	NEO: The Applicant confirms that no works are proposed within the Thorne & Hatfield Moors SAC, SPA or SSSI. The Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] requires the implementation of habitat protection buffers and prohibits works within retained sensitive areas, with the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] secured via requirement 8 of the Draft DCO [Document Reference 3.1 Revision 3] . These measures ensure that no works will occur within the designated site boundaries. The Applicant is also proposing that this land is transferred to Natural England, or another appropriate body, to enable its long-term management in accordance with the conservation objectives of the designated site, although understand that previously this was not considered feasible due to Natural England's lack of resources.	
-						
NE1	International designated	Potential loss of functionally	<u>Design of the mitigation areas</u>	Amber	NE1	

Consultee	Representation				Applicant's Response	
		<p>sites Humber Estuary SPA</p>	<p>linked land (FLL) for the relevant qualifying bird</p>	<p>Natural England concurs with point 6.2.36 of the sHRA, which concludes that for greylag geese, lapwing, mallard, and pink-footed geese the site is functionally linked to the Humber Estuary SPA and mitigation should be provided. We welcome that the proposed mitigation will also deliver for golden plover, which have been recorded in high numbers within the Wider Survey Area.</p>		<p>The Applicant has developed mitigation to ensure that suitable habitat is maintained for all of these species, with measures incorporated into the scheme design to avoid loss of ecological function associated with FLL supporting SPA bird species.</p> <p>In addition, the Applicant notes that the Order Limits are not functionally linked for golden plover and that greylag geese are not an SPA qualifying species, although consideration has been given to these species within the mitigation design.</p> <p>The Planning Inspectorate's Section 51 letter (EN010148, dated 15 August 2025) states that greylag geese are not an SPA qualifying species and that it was not clear why this species was being included within the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3]. As such, whilst this species has been considered within the mitigation design as part of a robust approach, mitigation for greylag geese is not required.</p> <p>The Applicant confirms that a full assessment of each parcel has been provided, this will include details on the proposals and management of each parcel. This is provided in an updated ES Appendix 7.10 Non-Breeding bird Mitigation Strategy [Document Reference 6.3.7.10 Revision 2] submitted at Deadline 1 and also the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] at Deadline 1.</p> <p>The Applicant confirms that Bird Days calculations have been used as a tool to inform the approximate mitigation area required, alongside ecological knowledge of the carrying capacity of different habitat types. Further detail is provided within the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3].</p> <p>Surveys undertaken demonstrate that golden plover are not a functionally linked species and therefore no species-specific mitigation is required. However, the mitigation areas have been designed to provide open vistas suitable for lapwing, which will also provide suitable habitat for golden plover.</p> <p>Section 2 of the Non-Breeding Bird Mitigation Strategy submitted as Technical Appendix 7.10 Non-Breeding bird Mitigation Strategy [Document Reference 6.3.7.10 Revision 2] sets out calculations of land availability with 150 m open vistas, with this</p>
		<p>Humber Estuary Ramsar</p>	<p>features of the listed SPA/Ramsar sites – Core mitigation areas and the implementation of a buffer (C) and (O)</p>	<p>Natural England note the description of the habitat baseline for the mitigation areas provided in point 2.14 (Table 3) of the Non-Breeding Bird Mitigation Strategy. We advise that an assessment of each parcel should be provided. This should detail proposed design and enhancement/management (in line with the below advice in NE2) and demonstrate how the habitat suitability and capacity of each parcel will deliver for the intended species.</p> <p>We acknowledge that the Bird Days calculations have been provided, though advise that while they are a useful tool for informing approximate mitigation area size, they should be used in conjunction with ecological knowledge of the carrying capacity of different habitat types.</p> <p>For information, we highlight that golden plover and lapwing rely on open vistas to forage, and the relevant mitigation areas should seek to deliver this site characteristic to ensure suitability for these species. Golden plover tend not to use fields less than 10ha, and fields 15-30ha or larger</p>	<p>Amber</p>	

Consultee	Representation			Applicant's Response
			<p>are used more often especially when in flocks of over 100 birds².</p> <p>We advise that existing habitat suitability should be factored into the assessment of the proposed mitigation areas. We recommend that the design of mitigation areas should take into account potential benefits of securing areas of higher existing bird usage as mitigation areas through enhancement, rather than the establishment of entirely new habitats which have a lower usage baseline. For example, the <i>Wintering Bird Survey Results – 2023 to 2024 (Lapwing)</i> show significant lapwing usage of the southernmost point of the site in both years of surveys.</p>	<p>information also included within the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3] and provided as part of Figure 1 within this document.</p> <p>Several mitigation parcels larger than 10ha with at least 150m open vistas are provided, including M12 and M13.</p> <p>A total of 43.67ha of mitigation land with 150 m open vistas is located beyond 600 m of wind turbines, in line with point NE3 (see below), and is available for lapwing. Bird Days calculations demonstrate that 24.99 ha is required for lapwing (Appendix 2 of the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3]), confirming that more mitigation land is provided than required. Additional mitigation land within 600 m of turbines, including parcels M1 and M2, is also available, and lapwing have been recorded using these areas, therefore ensuring that additional land is available for this species.</p> <p>When considering mitigation land beyond 600m of turbines, 108.84ha remains available for pink-footed geese and mallard, the remaining functionally linked species recorded within the Order Limits. Bird Days calculations indicate that 22.98 ha is required for pink-footed geese, and as this species forages in similar habitats to lapwing without competing for the same resources, more than sufficient land is provided.</p> <p>Bird Days calculations are not applicable to mallard, as detailed in the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3]. However, substantial mitigation land remains available beyond 600 m of turbines even after accounting for lapwing and pink-footed geese (85.86 ha), in addition to enhancements to the ditch network which will improve habitat suitability for this species.</p> <p>Table 1.1 provides further detail on the mitigation land calculations.</p> <p>The Applicant confirms that mitigation areas have been selected to reflect bird use where possible. Given the mobility of SPA bird species, and the location of the Order Limits approximately 7.7 km from the Humber Estuary SPA, birds will utilise suitable habitat across a large area.. This is supported by non-breeding bird survey results that show use of the Order Limits changed between the survey</p>

Consultee	Representation				Applicant's Response	
					<p>periods, although also show notable lapwing use in the northern part of the Order Limits close to proposed mitigation areas.</p>	
	<p>NE2</p>	<p>International designated sites</p> <ul style="list-style-type: none"> Humber Estuary SPA <p>Humber Estuary Ramsar</p>	<p>Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA/Ramsar sites.</p>	<p><u>Management of the proposed mitigation areas</u></p> <p>All mitigation areas should be adequately managed, monitored and secured in-perpetuity, at least for the lifetime of the development. This should be clearly demonstrated in the relevant assessments. We advise that further detail is required on the proposed design, management and monitoring of the proposed mitigation areas within the oLEMP/Outline Non-Breeding Bird Mitigation Strategy.</p> <p>As previously advised, Natural England advises that the ecological mitigation plan should include the following:</p> <ul style="list-style-type: none"> - Clear objectives. - Target/s for each objective, including SPA bird use targets and habitat targets. - Details of required management and monitoring (including who is responsible and when it will take place). - Details of limits of acceptable change. - Details of remedial actions, where appropriate. <p>We advise that sufficient detail of the proposed management and monitoring approach is required in the oLEMP at this stage to ensure the HRA conclusions regarding the mitigation measures are robust and deliverable. We welcome that the proposed non-breeding bird mitigation will be secured for the lifetime of the development via the LEMP. However,</p>		<p>NE2:</p> <p>The Applicant confirms that further detail on the proposed design, management and monitoring of the proposed mitigation areas are provided within an updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] submitted at Deadline 1.</p> <p>Additional details provided in the Outline Non-Breeding Bird Mitigation Strategy has been included in the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] at Deadline 1, so they can be secured for the lifetime of the development.</p> <p>Natural England's recommended bird monitoring approach, including the scheduling of surveys, has been added to the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2].</p> <p>Further information has been provided regarding the potential remedial strategies which will be applied if habitats are found to be in sub-standard condition or if bird numbers fall below the target level in the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] at Deadline 1.</p>

Consultee	Representation			Applicant's Response	
			<p>we advise that all additional details provided in the Outline Non-Breeding Bird Mitigation Strategy should be adequately secured via the LEMP.</p> <p><u>Management</u></p> <p>We note the management outline described in point 7.2.62 of the sHRA. We advise that it should be clearly stated how each mitigation parcel will be managed for target species, as golden plover and lapwing have different requirements to greylag geese and mallard. We encourage consideration of habitat suitability, food availability and capacity of the different parcels to support waders and/or geese in the assessment. For example, a large parcel may include a habitat mosaic of dense grassland for geese, bare ground and scrapes with high invertebrate numbers for waders, and areas of suitably managed grassland for both groups, and therefore the parcel could deliver for both waders and geese. Whereas another parcel may be a smaller area of sugar beet crop closer to a feature that reduces perceived openness and therefore be less suitable for waders but deliver for geese.</p> <p>While waders and geese will both forage on the same grassland, factors such as dominant sward height will impact suitability on a species-basis. We advise that taller grasses favour foraging for geese, while short to medium grass height provides soil accessibility for foraging waders, and short sward favours foraging herbivorous ducks. We advise that the 5cm height to be maintained throughout Autumn/Winter is sufficient for wintering birds. The creation of a habitat mosaic of different sward</p>		

Consultee	Representation			Applicant's Response
			<p>heights within the parcels will allow for multi-species use, though will require attentive management.</p> <p>The oLEMP states that the sward within the mitigation areas will be managed using 'low density' sheep grazing or other livestock. We advise that detail should be provided regarding the specific approach to sward management, given the implications for mitigation functionality.</p> <p><u>Targets and monitoring</u></p> <p>We acknowledge section 6 of the oLEMP, which details the general monitoring protocol for the habitats to be established across the site. We advise that the monitoring protocol should also include bird targets for the relevant SPA species, to ensure that the mitigation areas are functioning for the target species. The bird targets should be based upon the baseline bird survey data.</p> <p>Natural England recommend that the following bird monitoring approach should be considered as a minimum:</p> <ul style="list-style-type: none"> • The monitoring schedule within the first 3 years should be more frequent to support mitigation establishment, and ensure any remedial works can be swiftly actioned. Non-breeding bird surveys should be undertaken once a month from November to March, annually for years 1-3. • After the initial consolidation period, monitoring may occur at two-year intervals for years 3- 	

Consultee	Representation				Applicant's Response	
				<p>10, and at five-year intervals subsequently until the end of operation.</p> <ul style="list-style-type: none"> We advise that a monitoring report should be produced and submitted to the relevant local planning authority following each of the completed surveys, with Natural England consulted if the site is failing to meet its targets. <p>Point 6.1.4 of the oLEMP states that it is responsibility of 'the Applicant' (RWE) to 'implement appropriate remedial measures' in response to the reports completed by a suitably qualified ecologist. We advise that further information should be provided regarding the potential remedial strategies which will be applied if habitats are found to be in sub-standard condition or bird numbers are below the target level.</p> <p>Natural England cannot provide comprehensive advice on the adequacy of the mitigation until this information is provided.</p>		
	<p>NE3</p>	<p>International designated sites</p> <ul style="list-style-type: none"> Humber Estuary SPA <p>Humber Estuary Ramsar</p>	<p>Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA/Ramsar sites.</p> <p>(C) and (O)</p>	<p><u>Potential impact of wind turbines in proximity to mitigation areas</u></p> <p>Point 1.5 of the Outline Non-Breeding Bird Mitigation Strategy states that due to the impacts of Tween Bridge Wind Farm, 'It is considered that this northern section of the Order Limits is already impacted for non-breeding birds due to displacement caused by the presence of the turbines'. This is supported by the non-breeding bird survey results, which show less usage in the central northern part of the site</p>	<p>Amber</p>	<p>NE3</p> <p>The Applicant notes that despite the presence of operational wind turbines in the north of the Order Limits, surveys demonstrate that the functionally linked SPA bird species do use land within 600m of these turbines. Numbers of lapwing, mallard and pink-footed geese have been recorded using these areas, as demonstrated by updated Figure P1 (16413_P16a_600m Buffers_TLR_RR). Therefore, mitigation land is being provided and secured in areas of existing bird usage, in line with point NE1 'securing areas of higher existing bird usage'.</p>

Consultee	Representation				Applicant's Response	
				<p>by SPA species.</p> <p>However, Natural England note that mitigation areas 1, 2, 3, and 5 are within proximity to one of the operational wind turbines. The sHRA should assess the potential displacement impacts and increased collision risk associated with siting a SPA mitigation area in this location, and whether this would impact the functionality of the mitigation.</p> <p>Natural England advise that a precautionary buffer of 600m should be used when assessing the predicted extent of displacement from wind turbines. Further assessment should be carried out within the recommended 600 m buffer zone to determine the predicted level and effects of displacement, informed by site-specific factors such as the habitats available, extent and type of bird usage within the buffer zone, relative importance of the area and existing pressures on the species present.</p> <p>Natural England advises that displacing birds on a continuing basis from areas used for all necessary stages of the non-breeding period equates to effective habitat loss, as such habitat is no longer 'available'. Should it be determined that the functionality of the mitigation areas would be adversely impacted, alternative sites should be considered.</p>		<p>Nonetheless, the majority of mitigation areas proposed are located well beyond 600m of any turbines, including all of areas M4, M7, M8, M11, M12, M13 and M15, and the majority of M3 and M5, totalling 152.51ha out of the total 187.32ha proposed. This ensures that there is sufficient mitigation land provided beyond 600m of turbines, as demonstrated by the Bird Days calculations, which Natural England have confirmed are accurate (see email correspondence dated 10.07.2025 – see Appendix 1), and which have been completed in addition to ecological knowledge of the carrying capacity of different habitat types.</p>

Consultee	Representation			Applicant's Response		
	NE4	<p>International designated sites</p> <ul style="list-style-type: none"> Humber Estuary SPA <p>Humber Estuary Ramsar</p>	<p>Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA/Ramsar sites.</p> <p>(C)</p>	<p><u>Construction phasing of mitigation areas</u></p> <p>The mitigation areas should be in place and functioning prior to construction works which lead to a loss of functionally linked land. The outline LEMP proposes that the <i>'initial ground preparation and sowing of seed mix will take place in the season before the main construction activity commences, to ensure that favourable bird habitat is available for birds to relocate once construction activity commences'</i>. Furthermore, point 7.3.3 of the Ecology and Nature Conservation chapter states that <i>'The proposed mitigation will be delivered in phases and linked to each land parcel'</i>.</p> <p>We advise that the strategy behind the timing and location of mitigation delivery should be detailed further, with an explanation of the factors which will determine the order in which the parcels will be developed. It should be clarified which mitigation parcels are intended to mitigate for each phase of the development and confirmed that each parcel will be delivered prior to construction of each relevant phase. We recommend pre-construction monitoring of the mitigation areas by a suitability qualified ecologist to ensure that they are suitably established prior to construction works commencing.</p> <p>We note point 7.3.4 of the Ecology and Nature Conservation chapter, which states that the potential impacts of the development are the same regardless of whether it proceeds in a phased or uniform approach.</p>	Amber	<p>NE4</p> <p>The Applicant agrees that mitigation areas intended to compensate for the loss of functionally linked land will be created in advance of construction activities that would result in such loss. As set out in the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2], initial ground preparation and sowing of mitigation areas will take place in the season prior to the commencement of the relevant construction phase, ensuring that suitable habitat is available for birds to relocate once construction activity begins.</p> <p>The Applicant confirms that further detail on the strategy for the timing and sequencing of mitigation creation has been provided within the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] provided at Deadline 1.</p> <p>The Applicant confirms that pre-construction checks of the mitigation areas will be undertaken by a suitably qualified ecologist to confirm that habitats have been established to an appropriate standard before construction works commence in line with the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2]. Where necessary, adaptive management measures will be implemented to ensure the mitigation areas are functioning as intended.</p> <p>The Applicant considers that the potential impacts will be the same regardless of whether construction proceeds in a phased or uniform manner, as the mitigation land will be provided prior to impacts occurring in both scenarios.</p>

Consultee	Representation				Applicant's Response	
	-	<p>NE5</p> <p>International designated sites</p> <p>Humber Estuary SPA</p> <p>Humber Estuary Ramsar</p>	<p>Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA/Ramsar sites. (O)</p>	<p><u>Permissive footpaths within the proposed mitigation areas</u></p> <p>We note that mitigation area M1(A) (Figure 2.2a: Indicative Operational Layout Plan) appears to have a permissive walking route through it. We advise that the impact of this path on the functionality of the proposed mitigation areas should be assessed in the HRA, particularly if this mitigation area is to be managed to SPA bird species.</p> <p>Natural England advise that the presence of human disturbance may reduce the suitability of the mitigation areas for SPA birds, impacting the core habitat available. We advise that NatureScot's <u>Disturbance Distances in selected Scottish Bird Species Guidance</u> may be helpful when considering disturbance distances.</p> <p>It should be clarified whether the proposed footpaths will be separated from the mitigation areas by stock proof fencing. We advise that if fencing is not proposed, the presence of dogs within mitigation areas can render the whole area unsuitable for the relevant species.</p> <p>We consider that signage alone would not be sufficient to reduce the impact of pedestrians and dogs within the mitigation area. However, Natural England would encourage fencing to be accompanied by 'positive' signage highlighting the reasons for the fencing, including, for example, pictures of the relevant bird species, in order to improve public engagement with the restrictions.</p>	<p>Amber</p>	<p>NE5</p> <p>The Applicant confirms that the potential effects of recreational disturbance associated with this route on the functionality of the mitigation areas for SPA bird species will be considered.</p> <p>The Applicant can confirm that, in line with Natural England's comments, it is currently engaging with stakeholders, including Natural England, regarding some proposed updates affecting mitigation area M1(A), one of which would include fencing the proposed permissive path route in response to Natural England's comments. The Applicant wrote to Natural England recently setting out details of the proposed updates. Subject to feedback received from stakeholders, the Applicant intends to bring these updates forward as part of the examination process and wrote to the Planning Inspectorate on 30 April 2026 giving notice of the same. The Applicant will continue to liaise with Natural England in relation to this matter via the SoCG process.</p> <p>Separately, the Applicant confirms that the mitigation strategy as a whole does not rely upon any single mitigation parcel to achieve the required level of mitigation. As set out in the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3] and supporting Bird Days calculations, the mitigation land provided across the Order Limits provides the area required to offset the predicted effects on SPA bird species, even if area M1 is removed from the mitigation area calculations, which we don't consider to be appropriate in any event, particularly having regard to the potential for the route to be fenced, a proposal on which the Applicant is currently engaging with stakeholders</p>

Consultee	Representation				Applicant's Response	
				<p>We note that alternative 'dog run' areas away from the bird mitigation areas may also be effective at reducing impacts and enabling public enjoyment of the site. We therefore advise that it may be appropriate to consider whether there are other areas within the site design that would be suitable for dogs to be off lead.</p>		
	<p>NE6</p>	<p>International designated sites</p> <ul style="list-style-type: none"> Humber Estuary SPA <p>Humber Estuary Ramsar</p>	<p>Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA/Ramsar sites.</p> <p>(C) and (O)</p>	<p><u>Hydrology of the proposed mitigation areas</u></p> <p>Natural England welcomes the proposed inclusion of scrapes/ephemeral pools in mitigation areas 11, 12, and 13. Natural England note point 2.8 of the sHRA, which states that the design of these features will be subject to '<i>consultation with engineering/attenuation requirements</i>'.</p> <p>We advise that water level management of the proposed grassland areas should be considered in the scheme design, and we recommend assessing the existing drainage regime to determine the ability of the fields to hold sufficient water. This should include assessment of current under field drainage, and the potential for this to be blocked, or boundary ditch water raised through use of sluices. In the absence of hydrological studies or assessment prior to construction, a precautionary approach is needed.</p> <p>Natural England advise that there needs to be confidence that the mitigation measures assessed in the HRA are deliverable. If hydrological</p>	<p>Amber</p>	<p>NE6</p> <p>The Applicant confirms that the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3] has been updated to demonstrate that the assessed mitigation measures are deliverable. This includes consideration of alternative mitigation approaches to the provision of scrapes, an assessment of any implications for habitat suitability, carrying capacity and the extent of mitigation required.</p> <p>Detail on scrape creation and their ongoing management, should they be provided, will be set out within an updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2]</p> <p>Further detail on the creation and management of scrapes has been set out within an updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2]</p>

Consultee	Representation				Applicant's Response	
				<p>studies are not completed at this stage, we advise that the HRA should include a detailed assessment of the potential alternative approaches to mitigation. This should include an assessment of whether the absence of scrapes would reduce the carrying capacity/suitability of the area for the relevant bird species and therefore determine whether a larger area of mitigation would be required under the alternative scenarios.</p> <p>We recommend that scrapes should be created at the same time as the ground is prepared for sward establishment. We recommend that the surface of scrapes should be disturbed every two years, in order to prevent over-vegetation. This can be achieved through use of rotovating or discing machinery, with an open/even finish in the margins.</p>		
	<p>NE7</p>	<p>International designated sites</p> <ul style="list-style-type: none"> • Humber Estuary SPA • Humber Estuary Ramsar 	<p>Potential noise and visual disturbance impacts to functionally linked land for relevant qualifying bird features of the listed SPA/Ramsar sites.</p> <p>(C)</p>	<p><u>Noise and visual disturbance impacts to functionally linked land</u></p> <p>Natural England advises that noise and visual disturbance impacts on functionally linked land during construction, operation and decommissioning should be assessed in more detail within the sHRA.</p> <p>Point 7.2.50 of the sHRA states that the <i>'majority of construction activity will be below 70dB and would therefore not cause any disturbance response to birds which may be utilising retained or adjacent land'</i> and therefore <i>'no specific mitigation is considered necessary for noise</i></p>	<p>Amber</p>	<p>NE7</p> <p>The Applicant confirms in line with the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] that it is expected that the majority of construction activity will be below 70dB and would therefore not cause any disturbance response to birds which may be utilising retained or adjacent land, including golden plover. Consequently, no specific mitigation is considered necessary for noise impacts with regards to the Humber Estuary SPA/Ramsar and SAC. In addition, the measures detailed in section 3.3.22 of the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] provide further certainty that noise impacts will be mitigated. Such measures include:</p>

Consultee	Representation			Applicant's Response
			<p><i>impacts with regards to the Humber Estuary SPA/Ramsar and SAC</i>. However, this justification is not considered sufficient and Natural England advises that further assessment is required.</p> <p>We advise that noise levels above 70dB LAmax are likely to be disturbing, and further information should be provided regarding the location, duration and potential impacts of any activities which have the potential to exceed this threshold.</p> <p>Therefore, we advise that further assessment should be provided in the HRA regarding the predicted location of 'noisy' works in the context of the non-breeding bird survey results. This assessment should identify whether disturbing noise levels from the development will affect land utilised by birds in significant numbers and determine the sufficiency of any embedded mitigation measures. Mitigation measures may include (one or a combination of) restrictions to timing of works, buffer zones, acoustic screening, piling shrouding or other measures.</p> <p>Point 7.2.55 of the sHRA which states that a visual disturbance to SPA birds using FLL will be managed via an ECoW reviewing the working areas and judging the risk to adjacent birds. The ECoW will subsequently decide whether or not <i>'hoarding/hessian mesh on the perimeter Heras fencing is necessary'</i>. We advise that further information should be provided regarding how the decision to apply mitigation will be reached and whether this approach adequately mitigates the potential impacts.</p>	<ul style="list-style-type: none"> • Ensuring vehicles and machinery are regularly serviced and in good condition; • Speed limits; • Installing silencers or attenuators where applicable; • Replacing older equipment with quieter alternatives; • Using broadband reversing alarms; and • Not leaving engines idling when not in use. <p>The Applicant considers that the detail has been provided in the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] as to when visual barriers are required: "In these instances, the appointed ECoW will review the proposed working areas and risk to birds in adjacent land (if a given phase would require works at a time of year when sensitive estuary birds would be present, taken to be September – March in any given year) and advise if additional screening in the form of hoarding/hessian mesh on the perimeter heras fencing is necessary."</p> <p>The Applicant confirms that Visual and acoustic barriers (typically 3m high) installed between bird mitigation areas and the working areas has been assessed within the updated Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3] alongside the approach proposed point 7.2.55, submitted at Deadline 1.</p>

Consultee	Representation				Applicant's Response	
				<p>Furthermore, Table 5-1 of the oCEMP states that 'Visual and acoustic barriers (typically 3m high) will be installed between bird mitigation areas and the working areas'. We welcome this approach and advise that it should be assessed within the sHRA alongside the approach proposed point 7.2.55.</p>		
	<p>NE8</p>	<p>International designated sites Thorne and Hatfield Moors SPA</p>	<p>Potential Loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA/Ramsar sites. (C) and (O)</p>	<p><u>Displacement/disturbance impacts to functionally linked land</u></p> <p>Nightjar can travel long distances to feed, with radio tagging studies conducted on Thorne and Hatfield Moors showing that nightjar frequently forage outside of the designated site and within the proposed development area. We advise that when developing mitigation, it is important to account for the fact that the tagging study only reflects the movements of a small number of birds. The data indicates that almost all tagged nightjar forage outside of the SPA, so it is reasonable to infer that many of the untagged birds will also. Therefore, further areas within the proposed order limits may constitute functionally linked nightjar habitat. Furthermore, there is limited evidence available of impacts of solar farms on nightjar; therefore, we advise that a precautionary approach should be taken, due to the importance of Thorne and Hatfield Moors SPA and supporting habitats for this species.</p> <p>Natural England welcomes that the sHRA references the 'retention and protection of hedgerows' and 'the seeding of species-rich neutral grassland around field boundaries' to</p>	<p>Amber</p>	<p>NE8</p> <p>The Applicant confirms that as noted by Natural England, nightjar can travel long distances to forage and therefore utilise land beyond the Order Limits boundary. As such, nightjar will not rely solely upon land within the Order Limits for foraging.</p> <p>The Applicant confirms that the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] has been updated at Deadline 1 to clearly set out and secure the specific management measures intended to deliver strengthened green corridors for nightjar, in line with Objective 3.</p> <p>The Applicant has also provide further detail within the updated Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3] submitted at Deadline 1, on the provision of margins for foraging nightjar in areas within proximity to the SPA and key foraging areas identified in the results of the GPS tagging data.</p> <p>While a minimum 2m buffer will be provided larger buffers comprising grassland margins will be delivered across the Order Limits as detailed in the, ES Figure 6.4 Landscape and Visual Mitigation Strategy [Document Reference 6.4.6.4 Revision 2]. This includes the entirety of mitigation area M1 in the north of the Order Limits adjacent to Hatfield Moor SPA, the retention and protection of all non-statutory designated drains through minimum 5m buffers, which will be extended to 9m for all Internal Drainage Board (IDB) watercourses, a 15m buffer to Whittaker's Plantation CLWS, a</p>

Consultee	Representation			Applicant's Response
			<p>mitigate for the degradation of nightjar foraging habitat outside of the SPA. This aligns with objective 3 of the oLEMP, which is <i>'To provide strengthened green corridors along field boundary features, specifically for the benefit of nightjar'</i>. However, the oLEMP includes no further information as to how the proposed management measures will be specifically designed to mitigate impacts to nightjar and reach this objective. We advise that the sHRA should assess the suitability of any proposed mitigation measures in relation to the impact pathway, and the oLEMP should clearly set out, and secure, the specific details of the proposed management measures to mitigate impacts to nightjar.</p> <p>We advise that to minimise potential displacement impacts and ensure that nightjar are able to forage along the site's hedgerows, adequate margins should be provided between the panels and hedgerows. Particular focus should be placed upon the margins adjacent to the southern boundary of Thorne Moor, the northern boundary of Hatfield Moor, and the areas in which nightjar have been recorded foraging in the tagging studies.</p> <p>We note point 2.8 of the sHRA, which states that <i>'permanent grass margins to the fields measuring a minimum 2 metres'</i> will be built into the design. We advise that 2-metre margins are relatively narrow for a solar PV site and may not be sufficient to mitigate potential impacts to nightjar, due to uncertainty regarding displacement effects from solar panels, and the development of nightjar-supporting vegetation may be inhibited by factors such as panel shading and access</p>	<p>minimum 3m buffer to all hedgerows, and an approximate 40m to the bank top of River Torne. Additional larger buffers will also be provided between panels and security fencing, comprising grassland margins, with further grassland margin buffers provided outside security fencing throughout the Order Limits. Further detail has been provided within the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] and the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3] submitted at Deadline 1.</p> <p>The Applicant confirms that, considering the majority of the Order Limits currently comprises intensively managed arable farmland, the provision of additional grassland habitat throughout the Order Limits will increase foraging opportunities for nightjar.</p> <p>The Applicant confirms that the enhancement of hedgerows and planting of trees and scrub within margins and along field boundaries will be focused in areas in proximity to the SPA and areas where nightjar have been recorded foraging, with further details provided within the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] submitted at Deadline 1.</p>

Consultee	Representation				Applicant's Response
				<p>requirements along the margins. We therefore advise that wider margins will be required in key areas for nightjar.</p> <p>We advise that margins 10 metres wide have been shown to leave sufficient space for access and the development of functional habitat for a range of species³. Furthermore, wider margins will function as wildlife corridors between the SPA and mitigation areas, improving habitat connectivity for a wide range of species. The size of the proposed margins used should be justified within the sHRA.</p> <p>Natural England advises that the requirement for wider margins for foraging nightjar should be assessed in areas within proximity to the SPA and key foraging areas identified in the results of the GPS tagging data. For example (but not necessarily limited to), the boundaries of/corridors within the following fields:</p> <ul style="list-style-type: none"> • A3, A5, A6, A7, A8, A9 A11, A13, A19, A20, A21. • D14, D15, D16, D17. • B1, B2, B3, B4, B5. <p>Nightjar prey on moths, for which tree/scrub cover is important. The enhancement of hedgerows and planting of trees/scrub in the margins/along the boundaries should be focused in the areas in proximity to the SPA, and in which nightjar have been recorded foraging.</p>	

Consultee	Representation				Applicant's Response	
	<p>NE8a</p>	<p>International designated sites Thorne and Hatfield Moors SPA</p>	<p>Potential collision risk for nightjar using FLL. (O)</p>	<p>Natural England advises that the potential risk for nightjar collision with the solar panels should be assessed in more detail. Consideration should be given to relevant evidence and factors such as nightjar flight heights in the context of the proposed panel heights. Invertebrates have been recorded mistaking PV panels for water⁴, which hunting nightjar may also fail to recognise, increasing the likelihood of collision. Adequate mitigation should be assessed and implemented, where required. We advise that white borders on PV panels should be considered to reduce collision risk for nightjar utilising FLL.. Larger margins in key areas (as detailed above) should also be considered as mitigation for collision risk.</p> <p>We recommend that operational site monitoring should include monitoring of bird carcasses in order to monitor any increase in incidences of collision.</p>	<p>Amber</p>	<p>NE8a</p> <p>The Applicant notes Natural England's advice regarding the potential for polarised light effects associated with photovoltaic (PV) panels, including the attraction of aquatic invertebrates and the potential for an associated increase in collision risk for insectivorous bird species such as nightjar.</p> <p>The Applicant has reviewed the evidence cited by Natural England (e.g. Horváth et al., 2014), which demonstrates that horizontally polarised light reflected from flat, dark surfaces can attract polarotactic aquatic insects under experimental conditions, and that this effect may be reduced through the use of non-polarising white borders. However, the Applicant notes that the experimental conditions within this study are not representative of the Scheme. In particular, the test surfaces were positioned flat or near-horizontal at ground level, on dark substrates such as asphalt and in close proximity to water bodies</p> <p>In contrast, the Scheme will comprise tilted PV panels mounted at an angle and raised above ground level (minimum clearance of 0.8 m). The inclination, spacing and layout of panels, together with the presence of vegetation beneath and between panel rows, will substantially reduce the potential for panels to mimic water bodies or present a continuous reflective surface. In addition, the majority of panels are to be located well away from any watercourse, significantly reducing the likelihood of being mistaken for such a habitat.</p> <p>The Applicant further notes that the cited evidence relates to invertebrate behaviour and does not provide empirical evidence of increased collision risk for nightjar or other bird species. Natural England's evidence review (NEERO12) confirms that there is currently limited peer-reviewed evidence relating to the ecological effects of solar PV developments and no robust evidence demonstrating significant bird collision risk.</p>

Consultee	Representation				Applicant's Response	
					<p>In addition, modern PV panels incorporate surface treatments designed to maximise light absorption and minimise reflectivity, further reducing the potential for glint, glare and polarised light effects compared to earlier panel designs.</p> <p>On this basis, the Applicant does not consider that the provision of white borders on PV panels is a necessary or proportionate mitigation measure for the Scheme. Instead, mitigation is embedded through Scheme design, including appropriate panel height, layout and spacing, and the provision of habitat buffers and enhancements, that will increase the biodiversity importance of the site, as demonstrated by the BNG calculations.</p> <p>These habitat enhancements, along with the cessation of chemical input across the Order Limits will create improved habitat conditions for invertebrates and consequently foraging nightjar. This is supported by research by scientists from the RSPB and University of Cambridge as part of the Centre for Landscape Regeneration that concluded– hectare for hectare – solar farms situated in agriculturally dominated landscape contained a greater number of bird species and overall number of individuals than surrounding arable land, likely due to increased floral diversity providing food via seeds and invertebrate prey.</p> <p>The Applicant confirms that operational monitoring regarding the potential for bird collisions within the site has been included in the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] submitted at Deadline 1, including the monitoring of bird carcasses as part of the monitoring approach where appropriate.</p>	
	NE9	International designated sites Thorne and Hatfield Moors SPA	Potential noise and visual disturbance impacts to qualifying bird features of the listed SPA site.	Construction disturbance buffer Natural England acknowledge point 6.2.20 of the sHRA, which states that <i>'given the close proximity of the SPA to the Order Limits boundary, should construction take place during the time nightjar are present between April and</i>	Amber	NE9 The Applicant notes Natural England's comments regarding potential disturbance to breeding nightjar associated with construction activities in proximity to the SPA.

Consultee	Representation			Applicant's Response
			<p>(C)</p> <p><i>August, there is potential that disturbance impact from construction could occur from noise and lighting. We concur with this statement, and advise that nightjar have been recorded nesting in close proximity to the site boundary (<50m), making them potentially susceptible to disturbance.</i></p> <p>Natural England welcomes the use of timed construction buffers to avoid disturbance to nightjar. We advise that the seasonal timing of the buffers should be justified in the HRA.</p> <p>However, we advise that there are inconsistencies in the size of the buffer proposed. Point 3.3.23 of the ECMP proposes a buffer of 50m from the SPA, while Table 3-2 proposes a 'minimum of 15m stand off from boundary of SPA'. Furthermore,</p> <p>Table 7-12 of the Ecology and Nature Conservation chapter states 'Sensitive timing of construction works to avoid nesting period within 150m of SPA boundary'. Clarification and justification should be provided for the buffer used.</p> <p>We highlight that NatureScot recommends 150m-500m buffer for breeding nightjar, classifying the species as Medium/High susceptibility to disturbance⁵. Therefore, Natural England advises that a buffer of 50m from the SPA would not be sufficient during the breeding bird period. We advise that a larger buffer should be assessed and secured via the ECMP, informed by suitable evidence and details of</p>	<p>The Applicant confirms that the potential for disturbance to nightjar has already been considered within the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3], which recognises that nightjar may nest in close proximity to the SPA boundary and identifies the potential for disturbance from construction noise and lighting during the breeding season (April–August).</p> <p>Clarification has been provided to resolve the difference in buffer distances currently referenced within the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2], with a single, clearly defined buffer approach presented and secured through the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2]</p> <p>The Applicant has carried out an assessment of the potential construction phase ecological effects of the Scheme (including the proposed construction compounds) which includes consideration of disturbance impacts from construction noise. The findings of this assessment are reported in Environmental Statement Chapter 7 Ecology and Nature Conservation [APP-044] and Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3]. Measures proposed to control potential noise impacts from construction activity are set out in the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] and Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2].</p> <p>As outlined in paragraph 3.3.4 of the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] research recommends that construction noise levels are kept below 70dB to avoid excessive disturbance of birds. Figure 6.4.13.3 Environmental Statement Figure 13.3 Indicative Daytime Noise Contour Plot [APP-167] and Figure 6.4.13.4 Environmental Statement Figure 13.4 Indicative Nighttime Noise Contour Plot [APP-168] demonstrate that noise levels within the boundary of the SPA will be considerably less than 70dB (a maximum of 45dB during both day and night time) and therefore would not cause any disturbance response to birds in the SPA. These figures also show</p>

Consultee	Representation				Applicant's Response	
				<p>the proposed works during this period.</p> <p>Location of construction compounds</p> <p>We note that that the Indicative Construction Layout Plan shows that three of the proposed construction compounds are to be situated in close proximity to the SPA. Furthermore, Figure 13.4: Indicative Night-time Noise Contour Plot demonstrates that the night time noise impacts of these compounds have the potential to impact habitat within the SPA site boundary.</p> <p>Further information should be provided regarding the assessment of potential impacts, including consideration of potential alternative compound locations further from the designated site boundary, which would minimise potential impacts on sensitive receptors.</p>		<p>that noise levels within the Order Limits adjacent to the SPA, some of which is considered to be functionally linked, remain considerably below 70dB. Consequently, no specific mitigation is considered necessary for noise impacts with regards to the Thorne and Hatfield Moors SPA and the measures proposed to control potential noise impacts from construction activity set out in the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] and Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2] provide further confidence that no impacts will take place. The Applicant notes that this includes a commitment to avoiding construction works within 150m of the SPA between April and August which is considered to be the period when nightjar could be present.</p> <p>Specifically in relation to Natural England's comment regarding night time noise associated with the proposed construction compounds, the Applicant would highlight the core construction working hours set out at Section 4.1 of the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2], which is secured via DCO requirement 14 and will ensure construction activities are limited to daytime hours unless otherwise agreed with the relevant local planning authority.</p>
	NE10	<p>International designated sites</p> <ul style="list-style-type: none"> Thorne and Hatfield Moors SPA <p>Humber Estuary SPA</p>	<p>Potential lighting impacts to qualifying bird features of the listed SPA site.</p> <p>(C) and (O)</p>	<p>Lighting impacts</p> <p>We note point 7.2.48 of the sHRA which states that during construction the '<i>lighting of hedgerows and retained offsite habitats</i>' will be avoided '<i>through sensitive placement of lighting and choice of luminaire</i>'.</p> <p>We advise that the sHRA should assess the potential increase in light spill to Thorne and Hatfield Moors SPA, and FLL to the Humber Estuary</p>	Amber	<p>NE10</p> <p>The Applicant notes Natural England's comments regarding potential lighting impacts on qualifying bird features of the Thorne and Hatfield Moors SPA and Humber Estuary SPA.</p> <p>The Applicant confirms that potential construction lighting impacts have been considered within the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3] and supporting documentation. As set out within the Outline Ecological Construction Management Plan [Document Reference</p>

Consultee	Representation				Applicant's Response
				<p>SPA, and demonstrate whether there will be a net increase in light spill to the SPA once mitigation is applied. Furthermore, any mitigation for light spill should be stated in the Ecological Construction Management Plan, making specific reference to the management of light spill impacts to relevant SPA species, in addition to European protected species.</p>	<p>7.5 Revision 2] construction lighting will be temporary and limited to periods where natural lighting is insufficient, primarily during winter months when daylight hours are reduced.</p> <p>Core construction working hours are proposed to be from 07:00 hours to 19:00 hours Monday to Saturday and from 09:00 hours to 13:00 hours on Sundays.</p> <p>Construction temporary site lighting, in the form of mobile lighting towers, will be required in areas where natural lighting is unable to reach (sheltered/confined areas) and during core working hours within winter months. Artificial lighting will be provided to maintain sufficient security and health and safety for the Site, whilst adopting mitigation principles to avoid excessive glare and minimise spill of light to nearby receptors (including ecology and residents) outside of the Order Limits as far as reasonably practicable.</p> <p>All construction lighting will be deployed in accordance with the following recommendations to prevent or reduce impacts on human and ecological receptors, to be secured in the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2]:</p> <ul style="list-style-type: none"> • The use of lighting will be minimised to that required for safe site operations; • Lighting will conform to best practice guidelines with respect to minimising light spill into adjacent habitats and prevent disturbance to bats and other species during construction; • Lighting will utilise directional fittings to minimise outward light spill and glare (e.g. via use of light hoods/cowls which direct light below the horizontal plane, preferably at an angle greater than 20° from horizontal); and • Lighting will be directed towards the interior of the Site rather than towards the boundaries.

Consultee	Representation				Applicant's Response	
					<p>These measures ensure that light spill to adjacent habitats, including the Thorne and Hatfield Moors SPA and functionally linked land associated with the Humber Estuary SPA, will be minimised as far as reasonably practicable.</p>	
	<p>NE11</p>	<p>International designated sites Thorne Moor SAC</p>	<p>Hydrological impacts to SAC features (C) and (O)</p>	<p><u>Proposed management of mitigation area M1(A)</u></p> <p>We welcome point 2.29 of the Non-Breeding Bird Mitigation plan, which states that 'A <i>wet grassland scheme will be implemented with ditch raising and water level management in this location</i>'. We advise that details of this approach should be assessed within the sHRA and secured within the LEMP.</p> <p>Natural England has previously advised the Applicant on designing the management of mitigation area M1(A) in order to</p> <p>manage impacts to, and enhance, the hydrology of Thorne Moor SAC, whilst improving the habitat suitability for Humber Estuary SPA birds. This advice should be considered in the mitigation approach. The principles of the advice include:</p> <ul style="list-style-type: none"> - Maintaining higher water levels within the southern permitter ditch of the SAC would lead to a reduction in the hydrological gradient and improved water retention within the SAC. - The reprofiling the old peat cuttings along the boundary of mitigation parcel M1(A) boundary to create a gentler peatland slope would reduce sub-surface seepage from the 	<p>Amber</p>	<p>NE11</p> <p>The Applicant notes Natural England's comments regarding the proposed management of mitigation area M1(A) and the potential opportunities to support the hydrological functioning of Thorne Moor SAC.</p> <p>The Applicant has advised that flooding the mitigation areas could potentially alter downstream water levels and flow dynamics, increasing the risk of flooding elsewhere. The Applicant will undertake further consultation with Natural England in relation to this matter.</p>

Consultee	Representation				Applicant's Response	
	<p>deep peat immediately to the east, reducing future erosion. Blocking the boundary ditch at each end and reprofiling the peatland edge would have a positive effect on the SAC feature. This would potentially raise the water table for the wider parcel, creating damp grassland to benefit non-breeding waders.</p> <p>We would be pleased to provide continued advice on the management approach for this parcel to ensure suitability for the requirements of both Thorne Moors SAC and the Humber Estuary SPA.</p>					
	<p>NE12</p>	<p>International designated sites Thorne and Hatfield Moors SAC</p>	<p>Air quality impacts to SAC features (C)</p>	<p><u>Dust impacts on SAC features</u> Natural England note that the sHRA screens in Thorne and Hatfield Moors SAC for the 'degradation of habitat quality during construction, including dust and run-off'. We note that countermeasures for this impact pathway have been provided in the Outline eCMP. We advise that mitigation for dust impacts, if to be used in relation to an internationally designated site, should be assessed within the sHRA. The assessment should assess whether proposed dust-suppression measures provide adequate mitigation for impacts to designated sites within 200 m of the works, and would result in no significant change from the baseline.</p>	<p>Amber</p>	<p>NE12</p> <p>The Applicant confirms that the potential for dust-related impacts during construction has been considered within the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3] which identifies the potential pathway of habitat degradation through dust deposition and run-off.</p> <p>As set out in the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3], mitigation measures have been secured within the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2].</p> <p>There is no effect from dust deposition and run off due to the measures to be implemented as part of the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2], as concluded within the Report to Inform Habitat Regulations [Document Reference 5.3 Revision 3] and detailed within Table 7.2 of the same document. Accordingly, the Applicant considers that the mitigation measures set out within the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] are sufficient to avoid significant dust-related effects on the SAC.</p>

Consultee	Representation				Applicant's Response	
					<p>Nonetheless, the updated Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] provided at Deadline 1, provides further detail regarding the proposed dust-suppression measures for impacts to designated sites within 200 m of the works, and will include confirmation that these measures would result in no significant change from the baseline.</p>	
	<p>NE13</p>	<p>International designated sites Thorne and Hatfield Moors SAC</p>	<p>Air quality impacts to SAC features (C)</p>	<p><u>Non-Road Mobile Machinery</u> Natural England reiterates our previous advice on assessing the impacts of NRMM on designated sites. We note the shadow HRA states "<i>if there are fewer than 1,000 movements per day, no significant effect is anticipated.</i>" However, Natural England recommends the lower screening threshold for HGVs should be applied to NRMM. Alternatively, precautionary mitigation could be applied by securing a separation distance of 200m between NRMM and designated sites. The shadow HRA states "<i>...any vehicles and NRMM operating within 200m will remain as distant as practicable from the designation boundaries.</i>" However, this approach is not considered sufficient or adequately secured to rule out effects. For back-up generators, a 200m separation distance will not be sufficient to avoid impacts on designated sites and an assessment which includes information on the location, number, capacity, and operational hours of proposed back-up generators should be undertaken. We advise that the current justification provided in Appendix 14.1: Air Quality Impacts on Designated Ecological Sites is not sufficient to rule out impacts at this stage.</p>	<p>Amber</p>	<p>NE13</p> <p>The Applicant confirms that the potential for air quality impacts associated with NRMM and construction plant has been considered within the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3].</p> <p>The Applicant can confirm that generators will be >200m from the Thorne and Hatfield Moors SAC boundary, with further detail provided in an updated Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3] submitted at Deadline 1.</p>

Consultee	Representation				Applicant's Response	
				<p>We note that the shadow HRA and outline eCMP state that mitigation measures for noise include "Siting any generators in the east of the Order Limits." Natural England would welcome clarification as to whether generators will be located in the east of the Order Limits away from the SAC/SPA for noise purposes, which would also reduce the impact from emissions to air.</p> <p>We have attached Natural England's standard advice on NSIPs in Annex A. You should review any further information received in line with Natural England's advice to assess the application. This standard advice is Natural England's formal statutory advice. It provides decision makers with the information needed to fulfill their statutory duties when making decisions on NSIP applications with potential air pollution impacts. Any overall conclusion regarding impacts on statutory protected sites must take into account the standard advice for air pollution.</p>		
	<p>NE14</p>	<p>International designated sites</p> <ul style="list-style-type: none"> • Humber Estuary SPA • Humber Estuary SAC • Humber Estuary 	<p>Potential abstraction impacts resulting from Horizontal Directional Drilling (HDD) (C)</p>	<p>Natural England note that the Outline Ecological Construction Management Plan (oECMP) states that 'no water abstraction from ditches is expected.' However, no further details are provided in the HRA regarding where the water required for HDD will be sourced. Natural England advise that the source of the water for HDD should be clarified. If</p>	<p>Amber</p>	<p>NE14</p> <p>The Applicant confirms that the source of water required for HDD will be offsite. As stated within Table 3.2 of the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] no water abstraction as part of the directional drilling from the ditch network in the Order Limits is expected.</p>

Consultee	Representation				Applicant's Response	
		<ul style="list-style-type: none"> Ramsar Thorne Moors SAC Hatfield Moors SAC <p>Thorne and Hatfield Moors SPA</p>		<p>water is to be sourced from a local watercourse, the potential impacts to the Humber Estuary and Thorne and Hatfield Moors designated sites should be assessed in the HRA, where relevant.</p>		
	<p>NE15</p>	<p>International designated sites</p> <ul style="list-style-type: none"> Humber Estuary SAC Humber Estuary Ramsar Humber Estuary SPA Thorne Moors SAC Hatfield Moors SAC <p>Thorne and Hatfield Moors SPA</p>	<p>Potential water quality impacts - construction (C)</p>	<p>We advise that further detail on water quality impacts during construction and proposed mitigation should be assessed in the HRA for the relevant designated sites.</p> <p>We note that mitigation measures related to contaminated run off are outlined within the oECMP. These 'Practical Measures to Avoid or Reduce Impacts During Construction' should be assessed in the HRA, where relevant.</p>	<p>Amber</p>	<p>NE15</p> <p>The Applicant confirms that the potential for water quality impacts associated with construction activities has been considered within the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3], including the potential pathway of contaminated run-off affecting nearby watercourses and downstream designated sites.</p> <p>The Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3] references the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] which secures mitigation measures to be implemented to avoid or reduce the potential for contaminated run-off during construction.</p> <p>The Applicant confirms that the practical measures to avoid or reduce impacts during construction, as set out within the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] and assessed within the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3], will be implemented to control surface water runoff, manage pollutants and protect nearby watercourses.</p>
	<p>NE16</p>	<p>International designated sites</p>	<p>Potential water quality impacts -</p>	<p><u>Horizontal Directional Drilling - Bentonite breakout</u></p>	<p>Amber</p>	<p>NE16</p>

Consultee	Representation				Applicant's Response	
		<ul style="list-style-type: none"> Humber Estuary SAC Humber Estuary Ramsar Humber Estuary SPA Thorne Moors SAC Hatfield Moors SAC Thorne and Hatfield Moors SPA 	construction (C)	<p>Potential impacts from bentonite breakout from Horizontal Directional Drilling (HDD) should be assessed in the relevant documents.</p> <p>Natural England note that the HRA and outline eCMP include general practices and other mitigation measures in relation to HDD, including lighting. However, we note that mitigation measures for bentonite breakout are not explicitly addressed in the HRA. Natural England cannot provide comprehensive advice until this information is provided. Natural England advise that the outline eCMP should provide sufficient site-specific detail on the required mitigation measures for bentonite breakout to inform conclusions in the HRA.</p>		<p>The Applicant confirms that HDD activities will be monitored to identify any potential bentonite breakout during construction as detailed in Section 4.9 of the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3]. Appropriate controls detailed in this document and secured via the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2] will be implemented to ensure that any drilling fluids are contained and managed to prevent pollution of nearby watercourses.</p>
	NE17	<p>International designated sites</p> <ul style="list-style-type: none"> Humber Estuary SAC Humber Estuary Ramsar Thorne Moors SAC Hatfield Moors SAC Thorne and Hatfield Moors SPA	Potential water quality impacts - operation (O)	<p>Cleaning of solar PV modules</p> <p>Natural England note that section 7.2.34 of the HRA states '<i>Periodic cleaning and maintenance of PV modules will take place although will be temporary and not considered significant</i>'. Natural England advise that clarity should be provided regarding the cleaning substances to be used in the cleaning of solar PV modules, with impacts to water quality assessed in the HRA if appropriate. Natural England advise that a methodology which does not impact water quality should be used. The agreed approach to panel cleaning should be secured via the OEMP.</p>	Amber	<p>NE17</p> <p>The Applicant confirms that periodic cleaning and maintenance of PV modules will take place although will be temporary and not considered significant. Furthermore, solar PV modules will be cleaned using de-ionised water, with no chemicals used in the cleaning process, unless required in an exceptional case. As such, the cleaning of panels will not result in impacts to water quality or any designated sites, with detail provided within the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3] at Deadline 1.</p>

Consultee	Representation				Applicant's Response	
	NE18	International designated sites <ul style="list-style-type: none"> Humber Estuary SAC Humber Estuary Ramsar Thorne Moors SAC Thorne Moors SAC	Potential water quality impacts - operation (O)	Firefighting water runoff Potential impacts from firefighting water runoff should be assessed in the HRA. Natural England note that the outline Battery Safety Management Plan (BSMP) states that a drainage strategy will be developed <i>'such that retention of firefighting water runoff is afforded and cannot be released to the wider environment prior to being tested for any contamination.'</i> We note that this strategy will be developed post consent; however, we advise that further information is required pre-consent to inform the HRA. Whilst various fire suppression systems, including aerosol and gaseous options are discussed, we note that the use of an aerosol aqueous solution is currently considered for this site and that it is described as <i>'non-harmful to the environment'</i> . We welcome the environmentally preferable method but note the final system has not yet been confirmed. Details of the agreed system should be provided, with impacts to water quality assessed in the HRA if appropriate. The assessment should demonstrate that there will be no net increase in pollutants from contaminated water produced by the proposed fire suppression measures, where relevant. This may require details of control measures, closed system or mitigation, secured via the drainage strategy and BSMP.	Amber	NE18 The Applicant confirms that the Outline Battery Safety Management Plan [APP-179] includes provision for the development of a drainage strategy post consent to ensure that firefighting water runoff is retained on site and cannot be released to the wider environment until it has been tested for potential contamination. The Applicant also confirms that detail is provided in Section 7 of ES Appendix 10.1 – Flood Risk Assessment Part 1 [Document Reference 6.3.10.1 Revision 2] regarding firefighting water run-off and in section 7.42 of this document, it is confirmed that procedures will be in place to prevent contaminated runoff from entering the receiving waterbodies.
	NE19	International designated	In-combination	Natural England highlights that the sHRA does not include a detailed in-	Amber	

Consultee	Representation				Applicant's Response	
		<p>sites</p> <ul style="list-style-type: none"> Humber Estuary SAC Humber Estuary Ramsar Thorne and Hatfield Moors SAC <p>Thorne and Hatfield Moors SPA</p>	<p>assessment (C and O)</p>	<p>combination assessment following the appropriate assessment stage of the HRA. The sHRA instead defers to the Cumulative Impacts chapter of the ES – Chapter 17 [Document Reference: 6.2.6]. Relevant developments listed within this chapter are likely appropriate, though we advise that a detailed in-combination assessment is required within the sHRA.</p> <p>The in-combination requirements ensure that the effects of numerous proposals, which alone would not result in a significant effect, are assessed to determine whether their combined effect would be significant enough to require more detailed assessment. Therefore, where there are small effects which are not significant alone, these should be assessed alongside small effects of other plans/projects which were not significant alone. For impact pathways where there is no effect from the project alone, these will not require an assessment in-combination with other plans/projects. For instance, we advise that mitigation area M15 is within relatively close proximity to the proposed North Humber to High Marnham overhead powerline development. There should be consideration of the potential for collision and/or displacement impacts of this development on the functionality of the mitigation.</p>		<p>NE19</p> <p>The Applicant confirms that the potential for in-combination effects has been considered within the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3], which draws on the list of plans and projects identified within the cumulative assessment presented in the ES.</p> <p>The Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3] concludes that, following the application of mitigation measures, the Scheme will not result in significant effects on the relevant designated sites. As no residual effects arise from the Scheme alone, there is no pathway by which in-combination effects could occur.</p> <p>Accordingly, the Applicant considers that the information provided within the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 3] and the ES Chapter 7: Ecology and Nature Conservation [AS-012] demonstrates that the Scheme will not result in adverse effects on the integrity of the Humber Estuary SAC, Humber Estuary SPA, Humber Estuary Ramsar site, Thorne and Hatfield Moors SAC or Thorne and Hatfield Moors SPA, either alone or in combination with other plans or projects.</p> <p>The Applicant considers that as mitigation Area M15 is approximately 1,300m from the location of the proposed indicative powerline locations to be created as part of the High Marnham overhead powerline development, no potential for collision and/or displacement would take place as this is significantly further than the 600m buffer required for wind turbines as detailed in NE3.</p>
	<p>NE20</p>	<p>Nationally designated sites Humber Estuary SSSI</p>	<p>Potential impacts on the Humber Estuary SSSI designated features</p>	<p>Our advice regarding impacts on the Humber Estuary SSSI coincides with our advice regarding the Humber Estuary SPA/SAC/Ramsar.</p>	<p>Amber</p>	<p>NE20</p> <p>The Applicant confirms that the assessment of potential impacts and mitigation measures for the Humber Estuary SSSI aligns with those set out for the Humber Estuary SPA, SAC and Ramsar site, as reflected within the Report to Inform Habitat Regulations</p>

Consultee	Representation				Applicant's Response	
	(C) and (O)				<p>Assessment [Document Reference 5.3 Revision 3] and relevant management plans.</p>	
	<p>NE21</p>	<p>Nationally designated sites Thorne, Crowle & Goole Moors SSSI</p>	<p>Potential impacts on Thorne, Crowle & Goole Moors SSSI designated features (C) and (O)</p>	<p>Our advice regarding Thorne, Crowle & Goole Moors SSSI broadly coincides with our advice for Thorne Moor SAC and Thorne & Hatfield Moors SPA. However, we highlight that Thorne, Crowle & Goole Moors SSSI is designated for additional features including assemblages of breeding birds (mixed: lowland damp grassland, lowland heath, scrub, woodland) and invertebrate assemblage. We note that point 7.7.59 refers the reader to the 'relevant species' sections for impacts to SSSI breeding birds, non-breeding birds and invertebrates for a detailed assessment. However, we advise that there should be a distinct assessment of any potential impact pathway to SSSI features, proposed mitigation/avoidance measures, and anticipated effectiveness of these measures, within the ES.</p> <p>In particular, we advise that there should be further consideration of whether the buffers in which no panels are to be sited along the boundary of the SSSI are wide enough to minimise the loss of foraging resource for SSSI assemblage species. We note the findings of the Invertebrate Scoping Report, and acknowledge that the proposed enhancements suggested in the oLEMP will likely benefit invertebrates. We advise that potential impacts to invertebrates may be mitigated by using panels with non-polarising white borders and white grates. The use of this technology has also been shown</p>	<p>Amber</p>	<p>NE21</p> <p>The Applicant confirms that no development is proposed within the Thorne, Crowle & Goole Moors SSSI.</p> <p>The Scheme design includes buffers between solar infrastructure and ecological features including drains, woodland and boundary habitats. Clarification has been provided regarding the extent of buffers adjacent to the SSSI boundary in the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] submitted at Deadline 1.</p> <p>Given the grassland buffers to be provided to solar panels and ditches, the cessation of agri-chemical inputs and native habitat creation, all of which will enhance habitats for invertebrates, the provision of white borders on panels is not considered necessary by the Applicant. This is also supported by research undertaken by scientists from the RSPB and University of Cambridge as part of the Centre for Landscape Regeneration that concluded– hectare for hectare – solar farms situated in agriculturally dominated landscape contained a greater number of bird species and overall number of individuals than surrounding arable land, likely due to increased floral diversity providing food via seeds and invertebrate prey.</p> <p>Further detail on this has been assessed within the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] submitted at Deadline 1.</p> <p>Further clarity on the potential effects of introducing honeybee hives on the SSSI invertebrate assemblage, including competition for foraging resources, has been assessed in the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] submitted at Deadline 1.</p>

Consultee		Representation			Applicant's Response	
				to reduce incidences of bird collision. We advise that the impact of the introduction of 50 honeybee hives on the SSSI invertebrate assemblage should be assessed, including the potential for increased competition for foraging resource.		
	NE22	Nationally designated sites Hatfield Chase Ditches SSSI	Potential impacts on the Hatfield Chase Ditches SSSI designated features (C)	<p>As noted above, we advise that there should be a distinct assessment of any potential impact pathway to SSSI features, proposed mitigation/avoidance measures, and anticipated effectiveness of these measures, within the ES.</p> <p>Further detail should be provided on how HDD activities will be managed near the designated site. Natural England note that HDD crossing point 3 (Figure 2.4: Indicative HDD Crossing Plan) appears to cross the SSSI. Natural England notes that the applicant intends to use a 9m buffer for works in proximity to Hatfield Chase Ditches SSSI, in addition to IDB watercourses. However, Natural England advise a minimum 15m stand-off distance from SSSI watercourses for the send and receive pits. We advise that alongside the protected species advice, impacts to water vole should be considered in the context of the SSSI.</p>	Amber	<p>NE22</p> <p>The Applicant confirms that the further detail on the management of HDD activities in proximity to the SSSI, including clarification of HDD crossing point 3 and the proposed stand-off distances for send and receive pits is presented within the updated Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] submitted at Deadline 1.</p> <p>Potential impacts to water vole are also to be considered in the context of the SSSI through further surveys prior to construction works and if required the implementation of a licence, as detailed in Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] and summarised in Table 3.2 of the same document.</p>
	NE23	Protected Species	General comments	It is the responsibility of the person or organisation undertaking the works to make the decision as to whether a protected species licence will be required, typically based on advice from a consultant ecologist and based on appropriate consideration of survey	Grey	<p>NE23</p> <p>The Applicant confirms that the requirement for any protected species licences will be informed by ecological survey data and specialist advice, in accordance with relevant legislation as set out in the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2]. Where works are proposed that could</p>

Consultee	Representation				Applicant's Response	
				<p>data, specialist knowledge of the species concerned, the specific nature of the works and the habitats present.</p> <p>If the proposed works are likely to result in an impact to a protected species and/or their habitats, and such impacts cannot be avoided or appropriately mitigated for, then a protected species licence will likely be required to cover activities that would otherwise constitute an offence under the relevant legislation.</p> <p>If an individual or organisation chooses to proceed without a licence, and/or in accordance with the measures within a Precautionary Working Method Statement (PWMS), then Natural England advises that such persons document their decision-making process and outline the measures that will be taken to avoid committing an offence. Natural England does not provide commentary on, or approval for, PWMS approaches.</p> <p>It should be noted that if works are carried out under a non-licensed Method Statement and a protected species is subsequently identified on site, all works must cease immediately and Natural England must be contacted to obtain the appropriate licence.</p>		<p>affect protected species and cannot be avoided or appropriately mitigated, the necessary licences will be obtained.</p> <p>Where works proceed under a Precautionary Working Method Statement post consent, the decision-making process and avoidance measures will be documented. Should a protected species be identified during works, activities will cease and Natural England will be consulted as required with relevant licences applied for.</p>
	<p>NE23a</p>	<p>Protected species</p>	<p>Protected species – Otter</p>	<p>In the Ecology and Nature Conservation chapter it has been indicated that the Zone of Influence of the scheme for otters is within the ditch networks in the Order Limits. Given the mobile nature of the species and utilisation of terrestrial habitat Natural England would suggest this is reassessed.</p>	<p>Amber</p>	<p>NE23a</p> <p>The Applicant confirms that the otter and water vole addendums were submitted as part of the DCO Application, ES Appendix 7.6 Otter and Water Vole Survey Report [APP-077], and have been forwarded to Natural England for review following submission.</p> <p>As detailed in ES Chapter 7 Ecology and Nature Conservation [AS-012], updated surveys for otter and water vole will be completed</p>

Consultee	Representation				Applicant's Response
				<p>The Ecology and Nature Conservation chapter state there are addendums for the Otter and Water Vole Surveys. Natural England would welcome the addendums for review.</p> <p>The 2023 surveys identified potential otter holt/resting up areas at ditches D10 and D13, which are likely to be impacted by proposed mitigation works, as highlighted in the Otter and Water Vole Survey report and confirmed in Figure 1 of the Outline Landscape Ecological Management Plan. From the review of the 2025 survey points (Figure 1 of the Otter and Water Vole Survey Report) there was limited coverage of both ditches in 2025. Given impacts are likely to occur at these ditches, further survey of this area is considered necessary. The weather conditions preceding the otter surveys have not been provided within the report, however, heavy rain was not noted in the constraints. Therefore, Natural England assume the findings of the surveys are valid.</p> <p>Natural England would recommend also avoiding working in the vicinity of otter habitat during the hours of darkness and within 2 hours after sunrise and 2 hours before sunset. This can be reduced to one hour between November to February (inclusive) because of the limited daylight.</p> <p>Where ditch management and improvement are proposed a suitably qualified individual should survey the area prior to works to ensure no impacts on protected species are likely to occur.</p>	<p>following consent and prior to construction. These surveys will include the ditch network, including D10 and D13, as well as terrestrial habitats.</p> <p>Appropriate working methods will be set out to avoid disturbance to otter, including restrictions on working hours in proximity to otter habitat where required is included in the updated Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2] submitted at Deadline 1. Where ditch management or improvement works are proposed, pre-works checks by a suitably qualified ecologist will be undertaken to confirm the absence of otter and other protected species.</p>

Consultee		Representation			Applicant's Response	
	NE23b	Protected species	Protected species - Badger	<p>As some parts of the Order Limits have not been surveyed since 2022, Natural England advise undertaking additional badger surveys before works begin to confirm that the status of the setts within the survey area has not changed. We recommend that the additional surveys are planned to allow sufficient time for a licence application to be submitted and assessed (if required) before works need to begin. Please note that Natural England will expect updated surveys to have been completed if the survey data is 6 months or older in age at the time at which a licence application is formally submitted.</p> <p>Natural England recommend identifying the locations of the main setts present in before the development begins, Natural England advise marking the locations of all setts within the working area and providing toolbox talks to all site personnel to inform them of the legal protections afforded to badgers, the locations of setts, actions to be taken if a badger is encountered and contact details for appropriate persons (including an ecologist with relevant experience of badger mitigation).</p> <p>Natural England require more information about the height of the solar panels to be able to assess if gaps are to be created at the base of the perimeter fencing and solar compartment fencing, we advise that they are 250mm-300mm in height to allow badgers to move under the fencing more easily. If gates are to be used, they must be two-way gates, and consideration should be given as</p>	Amber	<p>NE23b</p> <p>The Applicant confirms that updated badger surveys will be undertaken prior to works commencing to confirm the current status of setts within the Order Limits as set out in Outline Ecological Construction Management Plan [Document Reference 7.6 Revision 2] in Table 3.2. Where required, surveys will be timed to allow sufficient opportunity for any necessary licence applications to be submitted and determined.</p> <p>Panels will be a minimum clearance of 800mm from the ground (see Table 2-1 of Parameters Document [Document Reference 5.6.1 Revision 3], ensuring the minimum height of 250-300mm is well exceeded and enabling movement for badgers and other wildlife.</p> <p>Mammal gates are to be used throughout the Order Limits and they will be two way.</p> <p>The locations of badger setts within the working area will be identified and appropriately marked, and relevant information will be communicated to site personnel through toolbox talks and site inductions. The Applicant confirms that a strict 30m buffer for works with heavy machinery or ground investigations within 30m of a sett will be undertaken as detailed in the updated Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] submitted at Deadline 1.</p>

Consultee	Representation					Applicant's Response
				<p>to how often the gates will be monitored to ensure they continue to open freely from both sides. If a licence application is submitted to Natural England, maps/figures should be provided that show the location of each sett and its entrances. Each entrance should be shown and numbered, and the status of each entrance (active, partially active or inactive) and the directions of sett tunnels displayed. Separate maps/figures could be submitted for each sett, or multiple setts could be shown on one figure if they are in close proximity. licensable activities have not been detailed in the 'Mitigation / Avoidance Measures' section of the 'Confidential Badger Survey Report'. Natural England support the statement of the mitigation hierarchy being followed and impacts to badgers being avoided wherever possible. If avoidance is not possible and a licence is required, Natural England recommend submitting the mitigation proposal for further review and comments using our Discretionary Advice Service (DAS) before a licence application is formally submitted. We advise that the proposed limit of 'Up to 30m from an active sett' is not sufficient. There should be a strict 30m buffer for works with heavy machinery or ground investigations within 30m of a sett.</p>		
	<p>NE23c</p>	<p>Protected species</p>	<p>Protected species - Bats</p>	<p>From the Ecology and Nature Conservation chapter it has been identified that bat surveys have been conducted in 2025 to assess potential impacts of the scheme on foraging and commuting routes. Natural England</p>	<p>Amber</p>	<p>NE23c The Applicant confirms that the Bat Survey Report was submitted as part of the DCO Application [AS-017] and has been forwarded to Natural England following receipt of this response.</p>

Consultee	Representation				Applicant's Response	
				<p>would welcome review of the Bat Survey report, and any additional proposed mitigation approaches, if appropriate.</p> <p>Bat roost impacts have been scoped out due to lack of direct impacts however it has been identified that there are trees within the order limits that have bat roosting potential. The potential of indirect impacts through light, noise and vibration during the construction period should be considered.</p> <p>It has been stated that if PRF-I trees require felling that Reasonable Avoidance Measures (RAMs) will be utilised. Any categorisation of tree roost suitability should be conducted by a suitably qualified ecologist.</p>		<p>Potential impacts to bat roost are included in the ES and summarised in Table 7.10 of this document, and Table 3.2 of the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2].</p> <p>Any trees with bat roosting potential will be assessed by a suitably qualified ecologist as detailed in the ES and summarised in Table 7.10 of this document, and Table 3.2 of the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2]. Where felling of trees with roosting potential is required, appropriate Reasonable Avoidance Measures will be applied in accordance with best practice and relevant guidance.</p>
	NE23d	Protected species	Protected species – Great crested newt	<p>Natural England recommend completing additional eDNA surveys (as detailed in Section 7.8.64 of 'Tween Bridge Solar Farm Environmental Statement. Chapter 7: Ecology and Nature Conservation') before construction works begin to increase confidence of GCN absence.</p> <p>We advise continuing efforts to gain access to survey all ponds within 250m of the Order Limits.</p> <p>Section 2.2.2 of 'Tween Bridge Solar Farm Environmental Statement Appendix 7.7: Great Crested Newt Presence / Absence Survey Report' details that not all watercourses within and adjacent to the Draft Order Limits could be surveyed due to the scale of the watercourse network. Natural England recommend surveying all waterbodies that have the potential to</p>	Amber	<p>NE23d</p> <p>The Applicant confirms that updated GCN surveys will be undertaken prior to construction as set out in Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] in Table 3.2. Efforts will be made to gain survey access to all ponds within 250m of the Order Limits, unless access permissions are not granted or health and safety constraints prevent surveys from being completed.</p> <p>The Applicant confirms that the full version of ES Appendix 7.7: Great Crested Newt Presence / Absence Survey Report' [Document Reference 6.3.7.7 Revision 3] that includes the missing Pages 20 – 24 have been issued to Natural England and submitted at Deadline 1.</p> <p>The Applicant confirms that any further documents to be reviewed by Natural England, although none are expected, will provide maps/figures that clearly show the locations of the waterbodies with the survey area, the survey methods that were used for each</p>

Consultee	Representation				Applicant's Response	
				<p>support GCN, unless access permissions are not granted or health and safety constraints prevent surveys from being completed.</p> <p>If further documents are to be reviewed by Natural England, we advise providing maps/figures that clearly show the locations of the waterbodies with the survey area, the survey methods that were used for each waterbody, and the results of the surveys. The Order Limits boundary should be clearly outlined, and figure legends provided to explain the symbols used on the figures.</p> <p>Pages 20 – 24 of 'Tween Bridge Solar Farm Environmental Statement Appendix 7.7: Great Crested Newt Presence / Absence Survey Report' are missing. Please ensure that all relevant information is submitted to Natural England for review.</p>		<p>waterbody, and the results of the surveys. The Order Limits will be clearly outlined, and figure legends provided to explain the symbols used on the figures.</p>
	NE23e	Protected species	Protected species – Water vole	<p>The 2023 survey identified presence of water vole at ditch 3, through the presence of latrines, burrows and feeding remains. The surveys utilised detection dogs. The use of detection dogs is an emerging survey technique and shouldn't be solely relied upon. However, the surveys were conducted in conjunction with a suitably experienced ecologist who was conducting the surveys in accordance with the Water Vole Mitigation Handbook (Dean <i>et al</i>, 2016), therefore the findings of the 2023 survey are acceptable.</p> <p>The 2025 surveys conducted in June identified presence at ditch 13, which is subject to impacts by proposed</p>	Amber	<p>NE23e</p> <p>The Applicant confirms that the ES Appendix 7.6 Confidential Report – Otter and Water Vole Survey Report[APP-077] submitted with the DCO application has been issued to Natural England. The document contains the additional water vole surveys were undertaken in accordance with the Water Vole Mitigation Handbook (Dean <i>et al</i>, 2016), including further survey coverage where required to inform works associated with the proposed mitigation and culvert crossings.</p> <p>The results of the additional surveys have informed the assessment and the development of appropriate mitigation measures.</p> <p>As detailed in Table 3.2 of the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2], updated surveys will be undertaken prior to construction in accordance with</p>

Consultee	Representation				Applicant's Response
				<p>mitigation works. No secondary survey in the second half of the season, as recommended by The Water Vole Mitigation Handbook has been included in the survey report. However, section 2.9 of the Otter and Water Vole Survey Report indicated a further summer survey will be conducted in line with guidance. Natural England would welcome the submission of the updated report for review.</p> <p>From the Ecology and Nature Conservation chapter it has been identified that targeted water vole surveys will be conducted on ditch crossing points. Given the presence of IDB ditches within the Order Limits management of the ditches by the IDB is likely to create a dynamic situation on site, which could have impacts on the water vole population's distribution. Therefore, Natural England would recommend wider updated surveys are conducted in accordance with The Water Vole Mitigation Handbook (Dean <i>et al</i>, 2016), in particular this should cover the locations of the proposed 45 culverts.</p> <p>As per the otter section, the Ecology and Nature Conservation chapter state there are addendums for the Otter and Water Vole Surveys. Natural England would welcome the addendums for review.</p> <p>Where ditch management and improvement are proposed a suitably qualified individual should survey the area prior to works to ensure no impacts on protected species are likely to occur as a result of the works.</p>	<p>the Water Vole Mitigation Handbook (Dean et al, 2016), including coverage of the locations of the proposed 45 culverts.</p> <p>The Applicant confirms that the Otter and Water Vole Survey reports have been issued to Natural England.</p>

Consultee		Representation			Applicant's Response	
	NE23f	Protected species	Protected species – Breeding birds	<p>The oLEMP states that skylark plots will be provided in accordance with Countryside Stewardship guidance. Care should be taken to ensure that the actions required for developing/managing skylark habitat work in conjunction with the requirements for wintering birds, given that the intention is to provide mitigation for both within the same plots.</p> <p>The advice provided in Section NE8 regarding the dimensions of field margins for foraging nightjar is relevant for creating/sustaining habitats for other breeding birds. Wider margins will provide greater foraging and nesting opportunities for breeding birds, and is encouraged.</p> <p>When developing habitat for breeding birds, like skylark, we recommend that our advice provided in NE2 regarding setting objectives and targets for species should be applied. This is to ensure that habitat can be managed long term, and adapted as need be. The assessment of impacts to skylark, and grey partridge, both of which occur in significant numbers on site, falls outside of Natural England's statutory remit. We advise that the applicant should consult with local stakeholders, including the Local Planning Authority, for advice regarding these species and breeding birds more broadly.</p>	Grey	<p>NE23f</p> <p>The Applicant confirms that the management of skylark plots will be implemented, in addition the mitigation land will be managed for the benefit of ground nesting birds in line with the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2]. The management approach will ensure that measures for breeding birds operate alongside the requirements for wintering birds where these habitats are delivered within the same areas.</p> <p>As set out in the response to NE8, wider field margins are incorporated within the Scheme design in key locations. These margins will provide additional opportunities for foraging and nesting for breeding birds.</p> <p>The Applicant also confirms that objectives and management targets for breeding birds have been included within the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] submitted at Deadline 1 to support the long-term management and monitoring of these habitats.</p> <p>The Applicant also confirms that it has responded to representations made by the Local Planning Authority regarding skylark as part of the Examination and within sections 7.1 to 7.6 of the City of Doncaster's Relevant Representation.</p>
	NE24a	Biodiversity Net Gain (BNG)	Biodiversity Net Gain – Approach to assessment	Natural England welcome the commitment to delivering Biodiversity Net Gain (BNG) on this project. We recommend that the target increase in BNG of at least 10% across all	Grey	<p>NE24a</p> <p>The Applicant confirms the commitment to delivering at least 10% BNG on this Scheme.</p>

Consultee	Representation			Applicant's Response
			<p>biodiversity unit types is secured via the Landscape and Ecological Management Plan (LEMP). Please note that BNG is not yet mandatory for NSIPs and Defra's guidance on provision of BNG for NSIPs has not yet been published; therefore, our advice may be subject to change once this is available.</p> <p>By reviewing the project's biodiversity gain plan at this early stage, it gives us an opportunity to help maximise outcomes and reduce risks. It would be helpful to make the full BNG metric available for stakeholder review.</p> <p>We support that the biodiversity baseline included within the metric is based upon all land within the development's order limits. This includes all areas required for environmental mitigation. This presents a 'worst case scenario' approach and is consistent with the approach taken for other types of development, including TCPA.</p> <p>Natural England advises that BNG baseline habitat surveys should be carried out in line with best practice guidance. However, we note that the original surveys were carried out prior to the implementation of BNG and therefore welcome the use of a precautionary approach, informed by the available habitat surveys. We welcome that, in the absence of detailed condition assessments for all habitats within the Order Limits, a precautionary approach has been taken in the metric calculations and higher condition scores have been attached to baseline habitats, hedgerows and watercourses which ensures that the assessment does not underestimate baseline biodiversity</p>	<p>As set out in para 6.6.18 of the Planning Statement [APP-030], whilst the provisions relating to BNG for NSIPs are not currently in force, it is expected that the biodiversity gain statement to be introduced to the Planning Act 2008 (via Schedule 15 to the Environment Act 2021) will specify a requirement for new NSIPs to provide a minimum 10% BNG. The drafting of Requirement 8 of the draft DCO is reflective of this. Accordingly, the Applicant does not consider that it is necessary to go further by providing actual percentage gains across habitat types.</p> <p>The Applicant notes Natural England's support for the baseline approach adopted within the metric, including the use of all land within the Order Limits and the precautionary approach taken to habitat condition scoring, informed by available survey data and best practice guidance.</p> <p>The Applicant provides detail on the Trading Rules below in NE24b.</p> <p>NE24b</p> <p>The Applicant notes Natural England's comments regarding biodiversity metric trading rules. Although the full extent of scrub habitat has not been provided, woodland of the same distinctiveness as the required scrub habitat is being provided creating gains, which, while not the same broad habitat type, will comprise similar native woody species to scrub and will contribute positively to overall habitat quality.</p>

Consultee		Representation			Applicant's Response	
				value. Natural England notes that the developer has deviated from the Defra biodiversity metric trading rules. Trading rules are established to ensure losses are compensated for through creating or enhancing habitats on a 'like-for-like' basis, and of equal or higher value. In this case scrub habitat is being lost and is being replaced with woodland. This decision should be clearly explained and rationale provided.		
	NE24c	Biodiversity Net Gain (BNG)	Biodiversity Net Gain - Management and Monitoring	Natural England support the proposal to monitor and manage the site for BNG for 40 years, which is the lifetime of the Scheme, which is over and above the 30 years required for TCPA applications. We note that the LEMP states the site will be 'periodically monitored', however Natural England would recommend that a Management and Monitoring plan is implemented with prescriptive monitoring periods in place to increase chances of success. For example, annual monitoring for the first five years whilst new habitats establish followed by reduced frequency (every 3-5 years) depending on habitat maturity and stability.	Grey	NE24c The Applicant notes Natural England's comments regarding the management and monitoring of Biodiversity Net Gain. Further clarification is provided on the proposed monitoring framework within the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] submitted at Deadline 1, including defined monitoring periods during establishment and subsequent longer-term management, to support the delivery of BNG over the lifetime of the Scheme.
	NE25a	Soils and best and most versatile agricultural land	Comments on Appendix 15.1: Agricultural Land Classification Report	Natural England note that ' <i>The Order Limits consist of approximately 1,831 ha of agricultural land</i> ' (page 4, HRA) and Appendix 15.1 Agricultural Land Classification (ALC) assesses the grading of 1848.2 ha. Natural England also note that section 15.3.43 of the ES states that the area involved in the installation of the cables	Grey	NE25a The ALC has been completed at a detailed level for all the land within the Order Limits, with the exception of a small number of interconnecting cable route corridors and a small area of biodiversity land at the eastern edge of the Site. The results are detailed in the ES Appendix 15.1: Agricultural Land Classification [APP-120] and on ES Figure 15.1: Agricultural Land Classification [APP-173] .

Consultee	Representation			Applicant's Response
			<p><i>'involves temporary disturbance' and that 'The works will involve only a small part of this area and soil survey can be completed at a later date once the corridor width has been defined, and can inform the final Soil Management Plan prior to construction works commencing.'</i></p> <p>Natural England re-iterate that a detailed ALC and soil survey of the agricultural land should be undertaken across the full Study Area. Our advice remains that this data should be provided prior to consent in order to inform decision making. Soil data collected as part of an ALC survey can also be used to inform the soil resource and management plan as set out in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. Natural England advises that there is a risk of soil damage, ALC degradation and long term or permanent loss of BMV from cable installation (grid connection cable route). Therefore, soil will need to be handled according to best practice and reinstated to a high standard to reduce the impacts. The results from a detailed ALC survey would provide soils data to inform a soil management plan for the whole Site regardless of whether the use is permanent or temporary in nature. We advise, however, that the Examining Authority should determine whether the proposed approach is acceptable.</p> <p>Based on the information provided in the ALC survey, we highlight that the proposal has the potential to affect approximately 819.2 ha of BMV agricultural land (although the ES states this is as 813 ha). To assess the extent of impact on Best and Most Versatile (BMV) land, we note that the</p>	<p>Natural England's comments in terms of the potential for tracks to be retained on decommissioning are noted. They have been assessed in the ES Chapter 15: Agricultural Circumstances [APP-052] and NE's recommendation to the ExA is noted.</p> <p>In respect of the identification of peat, peaty subsoils were identified at a small number of locations, as set out in the ES Appendix 15.1: Agricultural Land Classification [APP-120] Appendix 3.</p> <p>The soils recorded as peat were mostly recorded at depth of 50-60cm down to 120cm (ALC maximum depth). Slightly shallower peaty subsoils were found at auger points 120, 122, 141 and 161, all found as a subsoil layer between different soils, with peaty soils at depths of 35/40cm to 45/70cm, with a variable layer of 10cm to 40cm identified.</p> <p>The subsoils identified as peaty subsoils were found below dark topsoils indicating high levels of organic matter, but none of the topsoils were sufficiently high in organic matter to be recorded as organic mineral soil, peaty or peat.</p> <p>It is the Applicant's understanding that these soils do not fall within the "high environmental value" soils identified in the Doncaster Local Plan Policy 60 (D).</p> <p>Nevertheless, the City of Doncaster Council have made a suggestion that a separate section of the Outline Soil Management Plan [Document Reference 7.8 Revision 2] could be provided dealing specifically with the peaty subsoils. The Outline Soil Management Plan [Document Reference 7.8 Revision 2] has been expanded to include where these soils are, and how they should be handled to minimise any impacts, and is provided at Deadline 1.</p> <p>Subject to NE's further comments on an expanded section within the OSMP, NE's comments are noted and agreed.</p>

Consultee	Representation				Applicant's Response
				<p>ES provides a breakdown of permanent and temporary land take by ALC grade. Table 15-12 Summary of Construction Effects on ALC suggest that all effects will be temporary. However, section 15.5.12 of the ES acknowledges that with regards to the access tracks, <i>'on decommissioning some or all of these tracks may be left for agricultural use, if the landowners request them to be left. If all were left there would be a permanent loss of 9.1 ha of BMV, which is a medium magnitude impact on a resource of high sensitivity, which is a moderate adverse effect, which is significant'</i>. We continue to advise that where there is uncertainty over the restorability of the works, we recommend that these are assessed as permanent losses.</p> <p>We also note that of the fixed infrastructure that covers BMV land, <i>'all except 0.4ha will be restored at decommissioning.'</i> The impact is predicted to be <i>'temporary and of low magnitude, and the overall effect is minor adverse, which is not significant'</i> (15.7.3 ES).</p> <p>Natural England note that the ALC report identifies the presence of peat in several sample locations across the Order Limits, with peat recorded at varying depths in the soil profile. The ES concludes that peaty soils were not identified at agricultural depth in a way that would influence ALC grading. However, Natural England advise that the presence of peat within the soil profile warrants consideration in terms of carbon storage, ecological sensitivity, and appropriate handling measures. We recommend that the ES should include a clear estimate of the volume of peat to be disturbed and an assessment of the potential impact on</p>	

Consultee	Representation				Applicant's Response	
				carbon sequestration, in line with the IEMA (2022) guidance, as previously committed to by the applicant.		
	NE25b	Soils and best and most versatile agricultural land	Comments on the <i>Outline Soil Management Plan</i>	<p>Natural England welcomes the submission of the Outline Soil Management Plan (oSMP). We note that the oSMP sets out principles for soil handling, restoration, and decommissioning.</p> <p>Natural England advises that all soils should be handled in a dry and friable condition. Table 1-1 of the oSMP identifies November to March (or December to February in dry years) as the least suitable period for working with Subgrade 1, 2 and 3a soils, however, section 2.2.11. states that <i>'Works within these periods may be able to take place'</i>. Natural England advise that it is expected that soil handling will be confined to the drier summer period (April through September) to minimise risk of soil damage. Soil handling should normally be avoided during October to March inclusive, irrespective of soil moisture conditions, because it will generally not be possible to establish green cover over winter to help dry out soils and protect them from erosion. This would minimise the need to recondition soils, which requires additional space and time.</p> <p>This is particularly important for land to be restored to agricultural use. Soil handling methods should normally be as specified as in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (including accompanying Toolbox Talks). A field</p>	Grey	<p>NE25b</p> <p>NE advises that soil handling should normally be confined to April through September, rather than April through October. This is because it is generally not possible to establish green cover to help dry soils out in storage outside this period. This advice accords with the Outline Soil Management Plan [Document Reference 7.8 Revision 2] which advises on seeding grass over soil storage bunds in 4.3.8.</p> <p>NE's comments on soil suitability tests in the Good Practice Guide for Handling Soils, are noted. These tests are referenced in the Outline Soil Management Plan [Document Reference 7.8 Revision 2] at section 3.</p> <p>NE's comments on short and long-term storage of soil, and on reinstatement of cable trenches, are noted and are covered within sections 4.3 & 4.5 of the Outline Soil Management Plan [Document Reference 7.8 Revision 2]</p>

Consultee	Representation				Applicant's Response	
				<p>suitable method for assessing whether soils are in a dry and friable condition based on plastic limits is set out in Part One (Explanatory Note 4 – Table 4.2 provided below in Annex 1) of the Institute of Quarrying's <u>Good Practice Guide for Handling Soils in Mineral Working</u>, and this approach together with the associated rainfall protocols should be adopted.</p> <p>Section 2.2.19 of the oSMP states that <i>'If localised compaction occurs during construction, it should be ameliorated. This can normally be achieved with standard agricultural cultivation equipment, such as subsoilers (if required), power harrows and rolls.'</i></p> <p>We advise that careful planning and consideration of the above advice regarding soil handling will lessen the risk of damage, and the subsequent need for amelioration.</p> <p>Natural England welcome that the 'Implementation of this outline SMP, and adherence to its principles, will be the responsibility of the Applicant who will appoint a competent Principal Contractor who will implement onsite during the construction and decommissioning stages'. Given the high quality of the agricultural land, we recommend that this should include supervision of soil handling by a competent soil specialist.</p> <p>We note that soil storage will be either short- or long-term. We welcome section 4.3.7 - 4.3.8 of the oSMP that states 'If the soil is likely to be stored for in excess of six months, then, depending upon timing, it should be seeded with grass.' Natural England supports this approach and advises that weed control and other necessary maintenance should also be carried out.</p>		

Consultee	Representation				Applicant's Response	
				<p>Natural England note the swift reinstatement of the soils after the cables have been laid and that cable installation will be to sufficient depth to avoid disturbance during decommissioning, and that cables may be left in situ in accordance with EN-3 guidance. We welcome the commitment in Section 6.1.1 of the oSMP to 'restore all fixed infrastructure areas to return the land to the same ALC grade and condition as it was when the construction phase commenced.'</p>		
	NE26	<p>Biodiversity enhancement</p>	<p>Advice regarding the management of solar farms to enhance biodiversity.</p>	<p>Section 2.10 of the <i>National Policy Statement for Renewable Energy Infrastructure</i> (EN-3, 2024) highlights that solar farms have the potential to greatly increase the biodiversity value of a site, especially on land which was previously intensively managed.</p> <p>Research indicates that solar farms managed specifically for biodiversity show significant increases in plants, invertebrates, and birds, compared with sites which are not. Consequently, the implementation of good design and management on solar sites can result in significant environmental enhancements beyond that which is required through Biodiversity Net Gain. We welcome the enhancements which have already been proposed, though we advise that there may be further scope for biodiversity enhancement. Please refer to Annex G for further information regarding the management of solar farms to enhance biodiversity, which may help refine your plans.</p>	Grey	<p>NE26</p> <p>The Applicant notes Natural England's comments regarding opportunities for biodiversity enhancement within the Scheme and should further enhancements be identified these will be included, where appropriate. Further detail is provided within the updated Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] submitted at Deadline 1.</p> <p>The Applicant confirms that there are no Ancient Woodlands within or in close proximity to the Order Limits, and no veteran trees, as detailed in the Arboricultural Impact Assessment [APP-070].</p>

Consultee		Representation			Applicant's Response												
	NE27	Ancient woodland and ancient/veteran trees	Ancient woodland and ancient/veteran trees - General	Natural England has adopted <u>standing advice</u> for ancient woodland, which should be referred to. Natural England is not providing bespoke advice on the ancient woodland information provided in the ES for this project. The requirement for mitigation/compensation has not been assessed by Natural England.	Grey												
<p>Natural England's Relevant Representations</p> <p>Part III: Natural England's comments on the draft Development Consent Order (DCO) and associated documents</p> <table border="1"> <thead> <tr> <th>Page</th> <th>Topic/DCO Requirement</th> <th>Natural England's comments</th> </tr> </thead> <tbody> <tr> <td>38-44</td> <td>Requirements 1-22</td> <td>Natural England welcomes the inclusion of draft Requirements relating to our remit, including Requirements 8, 10, 14 and 15. Please refer to our detailed advice on the associated draft plans in Part II of our Representations. We may have further detailed advice on the relevant plans, if further information is provided at a later stage.</td> </tr> <tr> <td>40</td> <td>Requirement 8 Landscape and ecology management plan</td> <td>We advise that consultation with Natural England should be referred to in part 1 of Requirement 8. It should be confirmed whether the additional details provided in the Outline Non-Breeding Bird Mitigation Strategy are adequately secured via the LEMP.</td> </tr> <tr> <td>NA</td> <td>Works within the designated sites</td> <td>As detailed in NEO above, we advise that the restriction to works within the Thorne Moor SAC, Thorne and Hatfield Moors SPA and Thorne, Crowle and Goole Moors SSSI designated site boundaries should be suitably secured via the DCO or associated plans.</td> </tr> </tbody> </table>					Page	Topic/DCO Requirement	Natural England's comments	38-44	Requirements 1-22	Natural England welcomes the inclusion of draft Requirements relating to our remit, including Requirements 8, 10, 14 and 15. Please refer to our detailed advice on the associated draft plans in Part II of our Representations. We may have further detailed advice on the relevant plans, if further information is provided at a later stage.	40	Requirement 8 Landscape and ecology management plan	We advise that consultation with Natural England should be referred to in part 1 of Requirement 8. It should be confirmed whether the additional details provided in the Outline Non-Breeding Bird Mitigation Strategy are adequately secured via the LEMP.	NA	Works within the designated sites	As detailed in NEO above, we advise that the restriction to works within the Thorne Moor SAC, Thorne and Hatfield Moors SPA and Thorne, Crowle and Goole Moors SSSI designated site boundaries should be suitably secured via the DCO or associated plans.	<p>The Applicant has added Natural England as a consultee in respect of the discharge of Requirement 8, in the latest iteration of the Draft Development Consent Order [Document Reference 3.1 Revision 3] submitted at Deadline 1.</p> <p>As Natural England notes at NEO, the Applicant has confirmed that no works are scheduled within these areas in the ES Chapter 7: Ecology and Nature Conservation , from paragraph 7.5.18 [AS-012]. The Applicant is proposing in due course to expressly clarify, by way of an update to relevant DCO documents, that no works would be authorised within the SPA, SCA or SSSI boundaries.</p>
Page	Topic/DCO Requirement	Natural England's comments															
38-44	Requirements 1-22	Natural England welcomes the inclusion of draft Requirements relating to our remit, including Requirements 8, 10, 14 and 15. Please refer to our detailed advice on the associated draft plans in Part II of our Representations. We may have further detailed advice on the relevant plans, if further information is provided at a later stage.															
40	Requirement 8 Landscape and ecology management plan	We advise that consultation with Natural England should be referred to in part 1 of Requirement 8. It should be confirmed whether the additional details provided in the Outline Non-Breeding Bird Mitigation Strategy are adequately secured via the LEMP.															
NA	Works within the designated sites	As detailed in NEO above, we advise that the restriction to works within the Thorne Moor SAC, Thorne and Hatfield Moors SPA and Thorne, Crowle and Goole Moors SSSI designated site boundaries should be suitably secured via the DCO or associated plans.															

6 Table 6-1 Lincolnshire Wildlife Trust Representation

Consultee	Representation	Applicant Comments
Lincolnshire Wildlife Trust	<p>Planning Inspectorate, Reference: Tween Bridge Solar Farm</p> <p>Lincolnshire Wildlife Trust [The Trust, hereafter] is a conservation charity in the county with a strategic remit to support conservation of the natural world, lead on the recovery of key habitats and species, and empower local communities to take action for nature. The Trust is supported by over 27,000 members across Lincolnshire.</p> <p>Thank you for inviting comment from Lincolnshire Wildlife Trust, our conservation officers have reviewed the referenced documentation against a series of strategic conservation and ecological criteria. The Trust has provided detailed comments and points of response below;</p> <p>Development I. We recognise the proposed development comprises a significant solar farm installation and associated infrastructure, designed to generate up to 800MW, and extends up to 1,831 hectares. The Trusts comments will be focused upon core components located within the boundaries of Greater Lincolnshire.</p>	<p>The Applicant notes this introductory commentary from the Wildlife Trust.</p>
	<p>Adequacy of Consultation</p> <p>II. The Trust identified itself as an interested party in a consultation response dated 11th December 2023, raising a number of points of query, as both a neighbouring land owner with a nature reserve and SSSI bounded to the proposed development, and as a nature conservation organisation.</p> <p>III. The Trust submitted follow-up requests for direct discussion through the info@tweenbridgesolar.co.uk email address in both April 2025 and July 2025, receiving holding responses, but no further engagement from the applicant.</p> <p>IV. Further, we have not located any record of our consultation submission or subsequent email requests within the presented DCO documentation.</p> <p>V. The Trusts wishes to express and echo comments on record from other stakeholders that the applicants consultation has been minimal, inadequate and a significant departure from comparable developers engagement endeavours. The oversight to engage with a directly impacted party, particularly when the abounding property is a nature reserve and SSSI designate, which is referenced by the applicant in numerous ecological reports and assessed for risks, should be considered a failure in due process.</p>	<p>II. III. IV. V.</p> <p>The Applicant undertook detailed consultation with Natural England, the government's statutory advisor on nature conservation, regarding survey scope and methodologies, potential impacts to designated sites, including SACs, SPAs Ramsar and SSSIs, required mitigation and enhancement for designated sites and protected species, and the overall design of the Scheme. In addition, detailed consultation was undertaken by the Applicant with the two relevant local authorities regarding the same topics, the City of Doncaster Council and North Lincolnshire Council. These consultations informed the ecology approach undertaken in support of the DCO Application.</p> <p>The Applicant also provided preliminary environmental information via a Preliminary Environmental Information Report (PEIR) chapter as part of the DCO consultation, which detailed the ecology information available at the time to support the consultation process under Section 42 and Section 47 of the Planning Act 2008 prior to the final</p>

Consultee	Representation	Applicant Comments
		<p>ES being produced. All consultation responses were considered as part of the ES.</p> <p>The Applicant has subsequently undertaken an online meeting with the Lincolnshire Wildlife Trust to ensure that all their comments are fully considered and addressed as appropriate through the DCO process.</p> <p>The Applicant will continue to engage with the Lincolnshire Wildlife Trust and will document the status of discussions within the Statement of Common Ground [Document Reference 9.5 Revision 1] and will make updates to this throughout the examination process to reflect any agreements made.</p>
	<p>Bird Impacts VI. In review of the breeding birds and non-breeding birds survey reports, we note the relative importance of Area B (Crowle) of the development, supporting a number of species which are present in significant numbers. For example, concentrations of species such as lapwing and golden plover. As noted by the applicant a number of species exceed the 1% threshold for Webs 5-year mean counts from the Humber Estuary SPA indicating usage as Functionally Linked Land.</p>	<p>VI.</p> <p>The Applicant acknowledges that there are a number of species that exceed the 1% threshold for Webs 5-year mean counts from the Humber Estuary SPA indicating usage as Functionally Linked Land, and consulted with Natural England regarding potential impacts and required mitigation.</p> <p>Given the mobility of SPA bird species, and the location of the Order Limits approximately 7.7 km from the Humber Estuary SPA, it is clear that SPA bird species travel large distances and will utilise suitable habitat where it is available and are not restricted to using habitat in only one location. This is supported by the breeding and non-breeding bird survey data recorded by the Applicant, which demonstrates that bird species move around the Order Limits and wider area and do not only remain in one part of the Order Limits, or rely on any specific area.</p> <p>With regards to lapwing the first years of surveys in 2022-23 recorded high numbers in Area B. However, in the second years of surveys in 2023-24 significantly lower numbers were recorded in Area B (17 in total), with higher numbers recorded elsewhere within the Order Limits. The Applicant has designed the mitigation areas to reflect bird use where possible, whilst acknowledging that bird species move to areas of suitable habitat. As such, the mitigation design completed following consultation with Natural England has</p>

Consultee	Representation	Applicant Comments
	<p>VII. We note and welcome the identification of need for a significant skylark mitigation strategy and provisions proposed with oLEMP to replace lost nesting opportunities with compensatory land allocation.</p>	<p>been designed to ensure the habitat requirement of bird species present, including those functionally linked to the SPA, are provided.</p> <p>VII. The Applicant agrees that the Outline Operational Landscape Ecological Management Plan [Document Reference 7.5 Revision 2] provides provisions to replace lost nesting opportunities and compensatory land allocation with regards to skylarks.</p>
	<p>VIII. However, The Trust also notes with concern and reservation the distribution of the proposed bird mitigation parcels, and lack of proximity to Area B (Crowle). With reference to the bird survey results and species distribution it is apparent that a number of other species are aggregating in or near to the Crowle warpings. As recognised, warpings form a transitional habitat on the periphery of peatlands, and commonly create damp arable or wet grasslands supporting high densities of soil invertebrates. The proposed mitigation sites do not appear to account for this higher carrying capacity habitat</p>	<p>VIII. As detailed above, the bird surveys undertaken by the Applicant demonstrate that bird species move around the Order Limits and wider area and do not rely or remain in one part of the Order Limits as detailed with ES Volume 2 ES Chapter 7 Ecology and Nature Conservation [AS-012]. Therefore, the Applicant has designed the mitigation areas to reflect bird use where possible, whilst acknowledging that bird species move to areas of suitable habitat. The Scheme’s mitigation strategy can be seen in Landscape and Visual Mitigation Strategy [Document Reference 6.4.6.4 Revision 2].</p> <p>The mitigation proposed by the Applicant, following consultation with Natural England, has been designed to ensure the habitat requirements of bird species present, including those functionally linked to the SPA, are provided. In addition to this, the Applicant has ensured that grassland margins and new native landscape planting are provided around Area B, and across the Order Limits, which will provide significantly enhanced opportunities for bird species, and other wildlife, compared to the existing situation, which is intensive arable farming.</p> <p>Recent research has shown that solar farms contain a greater bird abundance and species richness than arable farmland and that solar farms can benefit biodiversity in arable-dominated landscapes (Copping et al . 2025).</p> <p>The drainage scheme developed by the Applicant, as detailed in ES Chapter 10 Water Resource [APP-047], demonstrates with regards to water resources, flood risk and drainage that with the implementation of the embedded design and additional mitigation measures to be implemented for the construction, operational and</p>

Consultee	Representation	Applicant Comments
		<p>decommissioning phases, all identified potential effects have been assessed as being of Negligible significance, and therefore Not Significant. Therefore, the ground conditions will still provide the wet grassland with the Order Limits and surrounding damp arable beyond the Order Limits, for the benefit of soil invertebrates.</p> <p>Furthermore, the cessation of intensive arable farming practices within the Order Limits, which will significantly reduce the nutrient input into the water system, will likely assist with invertebrate density and assist with improving the carrying capacity of the habitats.</p> <p>Within the Relevant Representation provided by City of Doncaster Council [RR-006], City of Doncaster Council state that 'It is considered that the cessation of agricultural inputs and physical disturbance from ploughing and harrowing will have a beneficial impact on water quality and this is accepted.' The Applicant considers that this provides further supporting detail on this point.</p> <p>The Applicant has also ensured that wetland features are incorporated into the mitigation design to benefit invertebrates and therefore foraging bird species, with Mitigation Areas M10, M11 and M12 providing wetland scrapes.</p> <p>In addition, all ditches in the Order Limits are proposed to be enhanced through improved management, will have improved water quality due to cessation of farming practices, and will be buffered by neutral grassland verges to provide a further enhancement for wildlife.</p>
	<p>IX. The Trust would recommend either the relocation, or introduction of an additional mitigation site in close proximity to development Area B, in a suitable location on warplings habitat, at a scale accounting for the significant peak bird counts in this locality, in particular lapwing.</p>	<p>IX. The Applicant considers that the mitigation proposals, which includes not only the identified mitigation areas, but all the landscape planting, drainage ditch buffers and grassland margin provision, across the Order Limits, provides sufficient mitigation for the species recorded within the Order Limits</p>
	<p>X. The Trust is aware that opportunities are available for appropriate mitigation in proximal locations, if not abounding the proposed development, with third-party land owners in pre-registration as off-site biodiversity net gain providers</p>	<p>X. The Applicant welcomes the Wildlife Trust providing this information, although all BNG gains will be provided within the Order Limits</p>

Consultee	Representation	Applicant Comments
	<p>Biodiversity Net Gain XI. With reference to Appendix 7.12, 3.10 The Trust does not support the current assumptions of vegetation condition beneath solar panels. We refer to the latest of points of discussion and the pending Clarkson-Woods publication which supports classification as Modified grassland in Poor condition. We understand discussions for a formal clarification statement are underway with UKHab and Natural England which will recommend a specialist secondary code to this effect.</p>	<p>XI. The Applicant notes the comments raised by Lincolnshire Wildlife Trust regarding the classification of vegetation beneath solar panels.</p> <p>Within the Biodiversity Metric, the vegetation beneath the panels has been classified as neutral grassland in poor condition. This approach was adopted on a precautionary basis to reflect the potential influence of shading, maintenance access and panel infrastructure on vegetation composition and structure.</p> <p>The Applicant acknowledges the forthcoming Clarkson-Woods publication and the potential development of a specialist UKHab secondary code for vegetation beneath solar panels. As this clarification is not yet formally adopted within the UKHab classification or the Statutory Biodiversity Metric guidance, the current assessment has applied the most appropriate existing habitat classification within the metric framework.</p> <p>The approach taken is considered precautionary, as areas of grassland beneath solar panels will be established using a species-rich neutral grassland seed mix and managed through grazing or mowing. While some areas may achieve a higher condition over time, the Biodiversity Metric assessment conservatively assumes poor condition to avoid overestimating biodiversity gains.</p> <p>The Applicant will continue to monitor developments in national guidance relating to the classification of vegetation beneath solar panels. Should formal guidance or updated UKHab classifications be published prior to determination of the DCO Application, the Applicant will review the assessment and update the Biodiversity Metric where appropriate.</p>
	<p>Crowle Moor XII. In reference to Chp7 – Section 7.5, we acknowledge the narrative provided on the importance of the Thorne, Crowle and Goole Moors SSSI, and its role in supporting an assemblage of breeding bird, non-breeding bird, invertebrates and faunal communities.</p>	<p>XII. Agreed.</p>
	<p>XIII. As per our points on adequacy of engagement, we question the assumptions made over impacts to the SSSI and LWT nature reserve, given the lack of consultation or engagement in dialogue over management of the site with The Trust.</p>	<p>XIII. Consultation to discuss the SSSI was undertaken with Natural England and discussions will be continued between the Applicant and Lincolnshire Wildlife Trust regarding the SSSI and Lincolnshire Wildlife Trust nature reserve. The status of discussions within the</p>

Consultee	Representation	Applicant Comments
		<p>Lincolnshire Wildlife Trust SoCG [Document Reference 9.6 Revision 1] and the Applicant will make updates to this throughout the examination process to reflect any agreements made.</p>
	<p>XIV. We do not concur with broad statements made in 7.5.73 that ‘species associated with the SSSI are largely dependent on moorland habitat’.</p>	<p>XIV. The SSSI supports a range of species that are dependent on moorland habitat, although the Applicant acknowledges that some species associated with the SSSI also utilise other habitat types.</p> <p>The Applicant considers that with the native habitat creation proposed across the Order Limits, including large areas of neutral grassland in the place of intensively managed arable farmland, new native hedgerows and trees and improved water quality and soil conditions as a consequence of a cessation in intensive farming practices, will ensure that SSSI species will not be detrimentally impacted. The recent research by Copping et al . (2025), provides further clarity regarding this.</p>
	<p>XV. We consider that the surrounding arable fields function as a supporting mosaic to several of the species utilising the SSSI, affording important ecological functions as; foraging grounds, commuting habitats and supporting prey populations.</p>	<p>XV. The Applicant considers that the mitigation and enhancement measures proposed, including the native habitat creation across the Order Limits, comprising large areas of neutral grassland in the place of intensively managed arable farmland, new native hedgerows and trees and improved water quality and soil conditions as a consequence of a cessation in intensive farming practices, as also confirmed by CDC in their Relevant Representation [RR-006], will ensure that SSSI species will not be detrimentally impacted.</p> <p>Furthermore, the mitigation design still includes the provision of arable within the Order Limits and extensive areas of arable farmland beyond the Order Limits will remain post-construction.</p>
	<p>XVI. Insufficient detail has been provided within the invertebrate scoping report to determine if the level of survey effort was appropriate to assess the relative importance of these areas.</p>	<p>XVI. The Applicant considers the invertebrate survey effort is sufficient in determining the assessment for the Order Limits, especially when considering the proposals will revert large areas of intensively managed arable farmland into neutral grassland that will have a significant reduction in agrichemical input and create improved habitat for invertebrates.</p> <p>The cessation of intensive farming practices will also result in improved water quality across the ditch network and improved</p>

Consultee	Representation	Applicant Comments
		<p>opportunities for invertebrate species. The recent research by Copping et al . (2025), provides further clarity regarding this.</p> <p>The Applicant’s view is supported within the CDC Relevant Representation [RR-006], where they state with regards to invertebrates that ‘An assessment of likely significant effects is provided at Section 7.5 of the ES, and this provides sufficient information.’</p> <p>The Applicant’s view is further supported within Natural England’s Relevant Representation [RR-023], where they state that: ‘We note the findings of the Invertebrate Scoping Report, and acknowledge that the proposed enhancements suggested in the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] will likely benefit invertebrates.</p>
	<p>XVII. In review and overlay mapping of LERC records for Area B a number of priority and S41 species appear to be present on the bounds or within the arable fields identified for development.</p>	<p>XVII. The Applicant acknowledges that there are LERC records for Area B, including a number of priority and S41 species .</p> <p>The Applicant considers that the mitigation and enhancement measures proposed, including the native habitat creation across the Order Limits, comprising large areas of neutral grassland in the place of intensively managed arable farmland, new native hedgerows and trees and improved water quality and soil conditions as a consequence of a cessation in intensive farming practices, will ensure that opportunities for priority and S41 species will be enhanced, as confirmed within the recent research by Copping et al (2025).</p>
	<p>XVIII. We note the inclusion of perimeter fencing for the development, and recognise proposed inclusion of mammal gaps etc. However, the physical imposition of 2m–2.5m fencing is still likely to significantly impair some species natural foraging behaviours and diminish the value of proposed ecological boundary enhancements.</p>	<p>XVIII The Applicant has positioned mammal gaps to ensure connectivity through the Order Limits and to ensure potential foraging habitat for a wide range of wildlife is provided. In addition, the Applicant has designed the fencing to enable corridors and therefore connectivity throughout the Order Limits.</p> <p>The Applicant also considers that the cessation of intensive arable farming that will improve water quality and native habitat creation proposed, including hedgerows, neutral grassland and trees, will ensure foraging opportunities are enhanced across the Order Limits.</p>

Consultee	Representation	Applicant Comments
<p>Lincolnshire Wildlife Trust</p>	<p>XIX. From the Trusts perspective, insufficient information has been presented to support the determinations and conclusions drawn in; 7.5.76 – ‘Impacts on Thorne, Crowle and Goole Moors SSSI are considered to be negligible on a receptor of National value and sensitivity, but Not Significant during construction’. And 7.5.136. ‘Impacts to ...Thorne, Crowle & Goole Moors SSSI... will be of medium (positive) magnitude on a receptor of International/European – Local value and sensitivity, which are consequently a Significant beneficial effect’.</p> <p>In summary, The Trust wishes to register as an interested party and is of a position to oppose and object to this development. This is with consideration of the lack of granular detail available to allow for the comprehensive assessment of impacts to our nature reserve and the associated SSSI, and wider impacts of the development on bird species, with insufficient mitigations in place to compensate for impacts.</p> <p>If you have any queries regarding the above, please do not hesitate to contact me.</p> <p>Yours sincerely</p> <p>Dr James Wood Lincolnshire Wildlife Trust</p>	<p>XIX. The Applicant considers that the cessation of intensive arable farming that will improve water quality will assist with enhancing the SSSI and preventing impacts to damp and wet habitats, with agriculture detailed as being an Adverse condition reason on Natural England’s Condition of Features for this SSSI.</p> <p>The measures provided within the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] prepared by the Applicant, provides detail that demonstrate no impacts will take place to the SSSI during construction.</p> <p>In addition, the Applicant believes that the reasons detailed above, including the detail on native habitat creation across the Order Limits, buffer provision and connectivity measures, will ensure that habitat provision is provided and enhanced compared to the existing situation for SSSI species.</p>

7 Table 7-1 Canal & River Trust

Consultee	Comments	Applicant Comments/Actions
<p>Canal & River Trust</p>	<p>The Canal & River Trust is a charitable organisation and is the landowner and navigation authority for the Stainforth & Keadby Canal. Part of the canal is within the proposed Order Limits of the project. The Trust has a duty under the Trust Agreement with the Secretary of State for Environment, Food and Rural Affairs (28 June 2012) to operate and manage the waterways for public use and enjoyment. Additionally, the Trust has a duty under section 105 Transport Act 1968 to maintain commercial waterways in a suitable condition for use. This duty applies to the relevant part of the canal.</p> <p>The proposed Order Limits of the project extend up to and includes part of the Stainforth & Keadby Canal in a location to the east of Medgehall Swing Bridge, as part of Work Number 2. We understand that this relates to proposals to cross the canal via Horizontal Directional Drilling (HDD). Elsewhere, the proposed solar farm would lie in locations to the north and south of the canal, and would be potentially visible from the waterway.</p> <p>The following matters are of interest to the Trust, and we request that the examination considers these points.</p> <p>Draft Development Consent Order, including Protective Provisions:</p> <p>The Trust provided the applicant with its current standard set of protective provisions on 24th June 2025, having made the applicant aware of the standard set in its consultation responses earlier in the year. The Trust notes that whilst there are protective provisions for the Trust within the draft DCO (dDCO), they are not the standard wording requested. The applicant has stated that it considers these are proportionate, so the Trust now needs to understand whether the protective provisions within the dDCO will protect its infrastructure appropriately and reflect the Trust's processes to achieve that. It is seeking to work with the applicant on this matter and hopes to be in a position to update the examining authority soon in the examination.</p> <p>Notably, the protective provisions within the dDCO do not provide for the making good of any detriment to the canal, should any unplanned damages occur to the waterway as part of the development. Neither do they provide to indemnify the Trust for any losses attributable to the project incurred by the Trust, which contrasts with indemnities provided to other parties under the dDCO.</p> <p>The Trust also have concern that the dDCO seeks to disapply legislation listed in Schedule 3 (legislation to be disapplied) that may be necessary for the Trust to carry out our Statutory Responsibilities under the section 105 Transport Act 1968, notably Acts relating to the Stainforth & Keadby and the Sheffield & South Yorkshire Navigations. We consider that text</p>	<p>The Applicant agrees with the description of the Order Limits in so far as they interact with the Canal and River Trust's interests.</p> <p>Draft Development Consent Order, including Protective Provisions</p> <p>The Applicant considers that the protective provisions originally proposed within the Draft DCO [Document Reference 3.1 Revision 3] provided the Canal and River Trust ('the Trust') with adequate protection. However, given the Trust's preference for their standard wording, the Applicant has carefully amended the Trust's standard protective provisions to reflect the particular circumstances of the Scheme, as a baseline position for negotiations, and has provided the Trust with this amended version.</p> <p>The Applicant is currently engaging with the Trust to seek to agree the Protective Provisions for the benefit of the Trust. The Applicant will continue to engage with the Trust throughout the examination and is confident that agreement can be reached. The Applicant will document the status of discussions within the Canal and River Trust SoCG [Document Reference 9.12 Revision 1] and will make updates to this throughout the examination process to reflect any agreements made.</p> <p>The Applicant has made the requested amendment to the Draft DCO [Document Reference 3.1 Revision 3] to ensure that the disapplication of legislation listed in Schedule 3 (legislation to be disapplied) only relates to the provisions still in force that are incompatible with the powers contained within the draft DCO and do not impact on the operation or maintenance of the Stainforth & Keadby Canal as a navigable canal.</p> <p>The Applicant has not yet provided detail of the final cable design and HDD pit locations due to the need to retain flexibility until</p>

Consultee	Comments	Applicant Comments/Actions
	<p>could be added to article 9(1)(h) to ensure that the legislation listed in Schedule 3 (legislation to be disapplied) only applies to the provisions still in force that are incompatible with the powers contained within this Order and do not impact on the operation or maintenance of the Stainforth & Keadby Canal as a navigable canal. Drafting with this effect can be seen in DCOs for other solar farms such as SI 2024/943 (Cottam Solar), SI 2025/116 (West Burton); SI 2025/585 (East Yorkshire Solar); SI 2024/807 (Gate Burton); SI 2025/1105 (Tillbridge Solar).</p> <p>Protection of the Canal During Construction:</p> <p>Outline CEMP : The Outline CEMP, under the Water and Land, Soil and Groundwater sections, includes mitigation measures that should be implemented to ensure that the canal is adequately protected from construction activities. Notably, these include potential impacts from HDD drilling fluids and oils, dust, machinery operation, contaminated soils mobilization, and piling works. We request that full CEMP details should be reserved with any future consent to ensure that appropriate mitigation is utilised alongside the scheme.</p> <p>HDD: The Trust would wish to review any HDD proposals below the canal, so as to ensure that the structure of the canal is appropriately protected. The submission includes crossing drawings showing HDD at 7m depth below the canal, which we consider an appropriate depth. This would be subject to confirmation on where the 7m depth would be measured from, which we believe should be provided in the Outline CEMP. We would wish for this detail to be appropriately secured, and would wish to be reconsulted should the parameters change. The applicant will need to understand if sheet piles are in place on the canal at the point of the cable crossing. If they are, then the HDD method plan would need to include an assessment of their depth to ensure that the HDD will not collide with the piles. The mitigation outlined below in respect of vibration monitoring control and monitoring would also be required to help ensure the integrity of the canal structure.</p> <p>Protection for the canal should be secured in respect of any maintenance works and decommissioning works as well as for construction of the project.</p> <p>Landscape and Visual Character:</p> <p>The development site is located on both sides of the canal, and has the potential to impact the visual setting of the waterway, which could impact users of the canal.</p> <p>Paragraph 6.4.54 of the submitted Environmental Statement (Chapter 6, APP-043) provides a summary of the key impacts to the canal. It does highlight that the solar farm will be visible from parts of the canal. Appendix 6.7 (APP-071) provides a summary of the key impacts to the canal, which we consider useful. The study, and paragraphs 6.5.94 to 6.5.95 of the Environmental Statement highlight that impacts to the canal corridor would occur, with visibility of solar plant</p>	<p>detailed design when survey work can be carried out to determine the most appropriate locations. The Applicant has committed to a number of parameters regarding cabling works. These are outlined in the Appendix A: Parameters Document [Document Reference 5.6.1 Revision 3] and secured by Schedule 2, requirement 6 of the Draft DCO [Document Reference 3.1 Revision 3]. The drilling launch pits/ reception pits will not be located within 10m of the highway verge and the launch pits/ reception pits will have a maximum depth of 1.5m and maximum area of 7m x 3m. In accordance with Schedule 2, requirement 14 of the Draft DCO [Document Reference 3.1 Revision 3], a final Construction Environmental Management Plan must be substantially in accordance with the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2]. The final Construction Environmental Management Plan would need to be approved by the local planning authority before construction can commence.</p> <p>Landscape: Along some sections, the Scheme is located on both sides of the canal, which has been considered at the design stage and notable offsets and buffers included in the layout. This is accompanied by a strong planting mitigation strategy set out in the ES Appendix 6.7 Stainforth & Keadby Canal Thorne to Crowle Corridor Study [APP-071] and the ES Figure 6.4 Landscape and Visual Mitigation Strategy [Document Reference 6.4.6.4 Revision 2].</p> <p>The Applicant welcomes the response that the proposed mitigation measures are considered appropriate based on the detailed Canal Corridor specific information provided in response to early engagement by the Canal and Rivers Trust.</p> <p>The Applicant thanks the Trust for confirming it considers the proposed mitigation to be appropriate.</p> <p>Ecology: The Scheme includes the provision of new habitats and landscaping, including hedgerow planting and habitat enhancements in proximity to the Stainforth and Keadby Canal, which are intended to reduce potential impacts on commuting and foraging opportunities along the canal corridor. These measures will be secured and implemented through the Outline Landscape and Ecological Management Plan [Document Reference 7.5 Revision 2], which has been updated and</p>

Consultee	Comments	Applicant Comments/Actions
	<p>and equipment after initial installation. Mitigation by year 15 would reduce the impact, however, as hedgerows proposed as mitigation mature.</p> <p>We consider the proposed mitigation measure, comprising of new hedgerow planting, to be appropriate. In the event of a positive determination of the project, we request that the measures highlighted in figure 6.4 'Landscape and Visual Mitigation Strategy' (APP-148) are secured and implemented. Additionally, were the Landscape and Visual Mitigation Strategy to be capable of variation post-consent, the Trust would seek to be consulted on any variations affecting the impacts on the canal.</p> <p>Ecology:</p> <p>New Habitat: Although the majority of habitats (arable fields) are determined to offer low suitability for the species, paragraph 7.4.58 of the Environmental Statement (Revision 2) (AS-012) identifies that the network of hedges, watercourses including the Stainforth and Keadby canal, tree lines, pond, and occasional woodlands do provide some limited to moderate potential opportunities for commuting and foraging.</p> <p>The proposals seek to incorporate new hedgerows and new habitats as part of the wider scheme, especially near the canal, which would reduce the impact of the scheme on the canal corridor. In the event of a positive determination of the project, we request that the proposed landscaping arrangements are secured and implemented. The Trust would seek to be consulted on any post-consent variations to the secured landscaping arrangements with potential to affect impacts on the canal.</p> <p>Impact of Horizontal Directional Drilling (HDD): The Trust consider that there is a need to ensure that HDD below the canal does not result in vibrations that could adversely impact waterborne species or habitat.</p> <p>Paragraph 4.9.2. of the Outline Construction Environmental Plan (CEMP) (APP-176) highlights that a Method Statement for HDD will be provided prior to the commencement of works. Vibration control and monitoring measures, to limit the impacts to the canal, should form part of this Method Statement, so as to limit any impact to species in the waterway. This could also form part of a construction stage vibration assessment, discussed on page 66 of the Outline CEMP. The Trust request that this mitigation is secured and implemented.</p> <p>Compulsory Acquisition:</p> <p>The Trust is seeking to agree heads of terms for rights over Trust land with the applicant. As the Trust is willing to grant the necessary rights through an agreement, there is no need for compulsory acquisition powers to be granted over Trust land</p>	<p>submitted at Deadline 1. These measures are secured via requirement 8 of the Draft DCO [Document Reference 3.1 Revision 3] and the final Landscape and Ecological Management Plan will be approved prior to commencement of relevant works.</p> <p>In relation to Horizontal Directional Drilling beneath the canal, the Applicant agrees that appropriate controls are required to avoid adverse effects on waterborne species and habitats. A detailed HDD Method Statement will be prepared prior to commencement of works in accordance with the Outline Constriction Environmental Management Plan [Document Reference 7.1 Revision 2]. This will include measures for vibration control and, where appropriate, monitoring, informed by a construction-stage vibration assessment. These measures are secured via requirement 14 of the Draft DCO [Document Reference 3.1 Revision 3] and implemented as part of the approved construction management arrangements.</p> <p>The Applicant confirms that negotiations to secure a voluntary agreement for the necessary rights in the Trust's land is ongoing and is confident that an agreement can be reached prior to the examination concluding.</p>

8 Table 8-1 National Highways

Consultee	Representation	Applicant's Response
<p>Pinsent Masons LLP on behalf of National Highways Limited</p>	<p>1. Introduction</p> <p>1.1 This is the relevant representation of National Highways (“NH”) in respect of RWE Renewables UK Solar and Storage Limited’s (“RWE”) application for an order granting development consent (“DCO”) for the Tween Bridge Solar Farm project (“Authorised Development”).</p> <p>1.2 This representation is being submitted by NH in its capacity as a statutory consultee in the planning process, and as Strategic Highways Authority appointed under the provisions of the Infrastructure Act 2015 with responsibility for operating, maintaining and improving the Strategic Road Network (“SRN”). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p>	<p>This is noted.</p>
	<p>2. Summary</p> <p>2.1 At this stage, NH objects to the DCO and the Authorised Development as currently proposed for the following reasons:</p> <p>a. Proposed compulsory acquisition of NH’s operational land and/or acquisition of new rights that could interfere with NH’s undertaking and/or the potential to extinguish existing rights held by NH without suitable controls imposed.</p> <p>b. Deficiencies or uncertainties in respect of the potential for impacts on the SRN from a traffic and transport perspective, as assessed by RWE. Many of NH’s concerns in this respect reflect or build on previous comments raised as part of its review of the Preliminary Environmental Information Report (“PEIR”). These deficiencies are set out in paragraph 5 below.</p> <p>c. The draft DCO includes a number of provisions which authorise the interference with statutory powers belonging to NH and/or grant RWE powers over the SRN which would have significant safety implications if not properly controlled through NH’s protective provisions. The current draft of NH’s protective provisions as presented in the draft DCO is not agreed and represents a much-reduced standard of protection than that which NH expects with respect to a development of this nature, which has the potential for substantial impacts on the SRN.</p> <p>d. The Authorised Development has the potential to impact on NH’s proposed renewal works to the M180 (between Junctions 2 and 3 in both directions) which are currently programmed to commence in 2028/2029 with completion in 2030. It is necessary for the protection of these works that RWE agrees to cooperate with NH in the delivery of the Authorised Development in a</p>	<p>The Applicant notes the comments and has provided a response to each of NH’s points below in full detail.</p>

<p>way that safeguards the significant public investment to be made by NH in relation to the renewal works.</p>	
<p>3. National Highways</p> <p>3.1 NH is an arms-length government owned company responsible for the ownership, management and improvement of England’s motorways and major A-roads, collectively referred to as the SRN. The SRN comprises over 4,500 miles of road sitting at the core of the national transport system. The SRN is the most heavily used part of the national road network. It is also a complex network of highway structures, drainage and attenuation apparatus and telemetry and electronic communication assets. In short, the SRN is a critical piece of economic infrastructure, vital to the nation’s connectivity and the means for generating economic growth.</p> <p>3.2 NH is appointed pursuant to section 1 of the Infrastructure Act 2015 to act as the highway authority, traffic authority and street authority for the SRN. The effect of this appointment is to make NH the statutory custodian of this national asset, conferring on it the status and legislative functions of a strategic highways company.</p> <p>3.3 As a strategic highways company, NH must comply with a number of general and specific statutory duties. These include a statutory duty to ensure the SRN is maintained to the appropriate / sufficient standard free from any hazards so it is safe to use, and a statutory duty to assert and protect the rights of the public in use and enjoyment of the SRN.</p>	<p>This is noted.</p>
<p>4. Compulsory Acquisition</p> <p>4.1 RWE’s draft DCO includes powers of compulsory acquisition, temporary possession and the acquisition of rights in respect of 25 plots of land owned by NH or over which NH has an interest.</p> <p>4.2 To safeguard NH’s interests and the safety and integrity of the SRN, NH objects to powers of compulsory acquisition being granted in respect of NH’s operational land, and to any extinguishment of rights enjoyed by NH for the purposes of carrying on its undertaking. The relevant NH plots constitute land or rights acquired/obtained by NH for the purpose of maintaining its statutory undertaking and, accordingly, this representation is made under sections 127 and 138 of the Planning Act 2008. NH considers that there is no compelling case in the public interest for the exercise of compulsory acquisition powers over the NH plots without the inclusion of NH’s protective provisions in a form that is acceptable to NH, and that the grant of the DCO without such provisions would result in serious detriment to the SRN.</p> <p>4.3 To date, NH has not been able to identify any attempt by RWE to secure voluntary agreement to acquire land or rights from NH. Paragraph 25 of the relevant guidance document (Planning Act 2008: Procedures for the compulsory acquisition of land) states clearly that “Applicants should seek to acquire land by negotiation wherever practicable. As a general rule,</p>	<p>The Applicant is seeking to reach a voluntary agreement with NH for the necessary rights over the NH’ operational land and, to this effect, it has issued Heads of Terms for National Highways to review.</p> <p>The Applicant proposes to HDD under the M180 and therefore there will be no disruption to transport movements on the Strategic Road Network . The details of how the construction period is managed and impacts are minimised are detailed within the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2]. The documents sets out that:</p> <p><i>‘HDD will generally be utilised during construction under highways and some watercourses. General HDD practices are outlined below:</i></p> <ul style="list-style-type: none"> • <i>Reflect known ground conditions to select a specific route and depth through the most homogeneous geological conditions possible;</i>

	<p>authority to acquire land compulsorily should only be sought as part of an order granting development consent if attempts to acquire by agreement fail”</p> <p>4.4 Compulsory acquisition should be used as a last resort where all attempts to negotiate voluntary acquisition of land or rights have failed. Given the key interface with the SRN – in this case, cables crossing underneath the SRN and acquisition of land in which key road drainage infrastructure is located – NH expects that RWE engages actively and constructively with NH’s requirements to ensure that the Authorised Development comprised in the DCO application can safely co-exist with NH’s assets in a manner that does not prejudice the safe operation of the SRN.</p>	<ul style="list-style-type: none"> • <i>Casing of weaker un-cohesive layers to reduce bentonite breakout;</i> • <i>Use as low a concentration of bentonite as reasonably practicable;</i> • <i>Operatives to monitor the drilling for evidence of breakout and cease drilling and seal fissures or voids if applicable, as required;</i> • <i>Monitoring of drilling fluid returns and volumes to help identify losses;</i> • <i>Retain a stock of sandbags and pumps on site to contain breakout and dispose accordingly;</i> • <i>Bentonite water slurry will be stored in the launch pits and transported to a registered disposal site(s); and,</i> • <i>HDD wastewater (including bentonite) will be incarcerated within the launch pit and transported to a specialised local facility for disposal’</i> <p>The final Construction Environmental Management Plan must be substantially in accordance with the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2] and would need to be approved by the local planning authority before construction commences, as secured by Requirement 14 of the Draft DCO [Document Reference 3.1 Revision 3].</p>
	<p>5. Traffic Management</p> <p>5.1 The key interfaces between the Authorised Development and the SRN are in respect of the M180 and the M18. The M180 runs east-west towards the southern extent of the Authorised Development site, whilst the M18 runs north-south to the west. PV module areas and associated infrastructure will directly border stretches of the M180 mainline between Junctions 1 and 2. It also appears that cabling will cross underneath the mainline to connect the Authorised Development’s module areas. NH additionally anticipates that M180 Junctions 1 and 2, and M18 Junctions 5 and 6, may be used for vehicular access to the site of the Authorised Development.</p> <p>5.2 NH’s concerns regarding impacts on the SRN and how / the extent to which these have been addressed within the Application documents are set out below. Many of these comments reflect or build on previous comments raised by NH as part of its review of the PEIR:</p> <p>a. Transport Statement [APP-111] – this states that personal injury collision (“PIC”) data has been obtained for the most recent five-year period (Jan 2020 to Jan 2025 for City of Doncaster Council, and May 2020 to May 2025 for North Lincolnshire Council). NH requests that data for the most recent five-year period, excluding 2020 and 2021, is provided. In addition, the</p>	<p>The submitted documents, including the Outline Construction Traffic Management Plan [APP-182] confirm the construction traffic routing which includes the use of M18 Junction 5 and 6, and the M180 Junction 1 and 2.</p> <p>Transport Statement [APP-111]:</p> <p>Discussions with NH are ongoing in respect of PIC review and impacts on the SRN.</p> <p>It is the Applicant’s view that three years of PIC records are appropriate in this instance as there is no highway safety pattern or problems at any of the identified SRN junctions (as per PPG).</p>

<p>information provided at Appendix A of the Transport Statement indicates that M18 Junction 6 and M180 Junction 2 have not been included in the study area. NH requests that this is addressed.</p> <p>b. Baseline Traffic Survey Report [APP-113] – this indicates that no data was collected for the SRN. NH requests that RWE reconsider how the SRN is considered and assessed within the Application documents.</p> <p>c. Environmental Statement – the Transport and Access chapter of the ES [APP-049] states that the SRN was not assessed on the basis that the number of vehicle movements associated with the temporary construction period are considered to be comparable to typical daily variation on the SRN. This will need to be evidenced by RWE before NH can accept this position.</p> <p>d. Outline Decommissioning Environmental Management Plan [APP-178] – NH requests that it is included in the list of identified stakeholders.</p> <p>e. Outline Battery Safety Management Plan [APP-179] – it is not evident exactly where the Battery Energy Storage System(s) (“BESS”) are to be located within the Authorised Development. As such the proximity of the BESS to the SRN is unknown. When this information is known by RWE, this should be included within the Outline Battery Safety Management Plan to allow NH to take a view on the suitability of the development proposals in relation to the SRN.</p> <p>f. Outline Construction Traffic Management Plan [APP-182] – previous comments from NH seeking clarity in respect of the impact of construction traffic (namely construction worker movements, shift patterns and timings) at the SRN have not been addressed by RWE. In particular, no timings are presented, in order to determine whether vehicle movements would occur during peak times at the SRN. NH considers that assessment of the SRN within the Outline Construction Traffic Management Plan would allow the peak times of the SRN to be identified.</p> <p>g. Glint and Glare Assessments – the Glint and Glare Assessments [APP-122 and APP-123] state that proposed vegetation planting is expected to screen panels once sufficiently matured, such that views of reflecting panels are not expected to be possible. However, NH seeks further clarity as to how long the proposed vegetation planting will take to reach sufficient maturity to mitigate glint and glare, and the extent to which glint and glare issues may arise in the intervening period. NH also expects the DCO to make appropriate provision for the ongoing retention and maintenance of vegetation screening to ensure that any glint and glare issues cannot reoccur.</p>	<p>Baseline Traffic Survey Report [APP-113]:</p> <p>The use of available DfT traffic count data on the SRN has been agreed with NH and the traffic impacts associated with the Scheme will be set out for agreement shortly.</p> <p>Environmental Statement and Outline Construction Traffic Management Plan [APP-182]:</p> <p>As above, discussions are ongoing with NH. Additional information on construction worker movements including shift times has been provided to NH for comment and agreement.</p> <p>Outline Decommissioning Environmental Management Plan [Document Reference 7.3 Revision 2]:</p> <p>The Applicant agrees to National Highways’ request to be included in the list of identified stakeholders. An updated Draft DCO [Reference 3.1 Revision 3] has been submitted at Deadline 1.</p> <p>Outline Battery Safety Management Plan [APP-179]:</p> <p>Environmental Statement (ES) Figures 2.2a and 2.2b [APP-134 and APP-135], show the locations of the proposed BESS compounds. The Applicant notes that the locations are also shown on and secured by the Works Plans [APP-009] as Work No. 5.</p> <p>Glint and Glare Assessment [APP-122 and Document Reference 6.3.16.2 Revision 2]:</p> <p>The proposed vegetation is mixed native hedgerow planting as set out on Figure 6.4 Landscape and Visual Mitigation Strategy [Document Reference 6.4.6.4 Revision 2] which can be expected to establish quickly and put on growth rates depending on species of an average of approximately 300mm –500mm per year, on this basis the 2m high perimeter fencing would be covered by years 4-6 and the hedgerows achieving 3m maintained height at years 6-10. The visualisations in the ES Appendix 6.4 Part 1 & 2 [APP-067] and [APP-068] illustrate the expected screening at year 1 and year 15. This would be based on plant material being planted at approximately 400-600mm height. This would be delivered pursuant to the Landscape and Ecological Management Plan, under Requirement 8 of the Draft DCO [Application Document 3.1 Revision 3] and accompanied detailed drawings. If larger</p>
--	--

		<p>or faster growing plant material was required in certain locations this could be determined through additional discussions at the post-consent stage. The maintenance of the planting would be determined as part of the approved Landscape and Ecological Management Plan including the monitoring of the planting to determine any losses and required replacements during the subsequent planting season.</p>
	<p>6. DCO and Protective Provisions</p> <p>6.1 NH’s initial comments on the draft DCO are as follows:</p> <p>a. Requirements (Sch 2, Part 1) – NH requests approval rights in respect of the discharge of certain Requirements, including Requirements 9 (fencing and other means of enclosure), 11 (surface and foul water drainage), 16 (construction traffic management plan) and 19 (decommissioning and restoration), to the extent that the phase which is the subject of the relevant discharge application affects the SRN.</p> <p>b. Protective Provisions (Sch 13, Part 7) – the current draft of NH’s protective provisions as presented in the DCO is not agreed and represents a much-reduced standard of protection than that which NH expects with respect to a development of this nature, which has the potential for substantial impacts on the SRN. NH has a standard set of protective provisions (a copy of which is appended to this representation) which it requires to be secured on the face of the DCO, and it requests that RWE update the NH protective provisions in the DCO accordingly at the earliest opportunity.</p>	<p>a. The Applicant considers that the local planning authority is the appropriate approval body in respect of requirements 9, 11, and 19 of the Draft DCO [Document Reference 3.1 Revision 3]. However, the Applicant is happy to agree a requirement to consult NH in relation to plans submitted to the local planning authority for approval under these requirements. The Draft DCO [Document Reference 3.1 Revision 3] I has been updated accordingly and submitted at Deadline 1. The Applicant also confirms that NH as the highway authority for the strategic road network will have approval rights in respect of requirement 16, in so far as a particular phase of the scheme relates to the SRN.</p> <p>b. The Applicant is in ongoing discussions with NH regarding the protective provisions and will continue to engage with NH with a view to agreeing protective provisions prior to the close of the Examination.</p>
	<p>7. M180 Renewal</p> <p>7.1 As noted above, the Authorised Development has the potential to impact on NH’s proposed renewal works to the M180 (between Junctions 2 and 3 in both directions) which are currently programmed to commence in 2028/2029 with completion in 2030. It may be necessary for the protection of these works that RWE agrees to cooperate with NH in the delivery of the Authorised Development, to the extent that the two sets of works interact. This may include a requirement for RWE to enter into an interface agreement with NH in order to safeguard the renewal works.</p>	<p>During discussions with NH in December 2025, it was agreed that NH did not object to the Scheme on the basis of the potential for construction works for both the M180 improvement works and Scheme to overlap.</p> <p>The Applicant notes the potential interface and agrees that close coordination will be required during delivery. The Applicant is engaging with NH in relation to Protective Provisions to be included in the Draft DCO [Document Reference 3.1 Revision 3] and would be pleased to discuss the potential interface further with NH as part of this ongoing engagement.</p>

9 Table 9-1 National Grid Electricity Transmission Representation

Consultee	Representation	Applicant's Response
<p>National Grid Electricity Transmission Plc</p>	<p>Relevant Representation of National Grid Electricity Transmission Plc ("NGET ") in respect of the application for a Development Consent Order ("DCO") by RWE Renewables UK Solar and Storage Limited (the "Applicant") for Tween Bridge Solar Farm (the "Project")</p> <p>Introduction</p> <p>This relevant representation is submitted on behalf of National Grid Electricity Transmission Plc ("NGET") in respect of the Project, and in particular NGET has existing and proposed infrastructure and land interests which will be located within and in close proximity to the Project's Order Limits, where interactions may occur. Specifically:</p> <ol style="list-style-type: none"> 1. The Applicant is seeking the permanent freehold acquisition of land, and the acquisition of temporary and permanent rights over a number of plots containing NGET rights and assets for NGET's existing ZDA 400 kilovolt (kV) overhead line routes, including those shown on sheets 1, 2, 3, and 4 of the Land Plans [Ref: EN010148-000225-2.2] and Works Plans [Ref: EN010148-000226-2.3]; and 2. The Project will be in close proximity to NGET's critical North Humber to High Marnham overhead line project (the "NHHM Project"), which is also a nationally significant infrastructure project, and both schemes are likely to overlap in construction timescales and will therefore have cumulative impacts for the area. <p>NGET's Statutory Duties</p> <p>As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. NGET has a duty to protect its position in relation to apparatus and land which is within or in close proximity to the Project's draft Order Limits. Additionally, NGET must protect its ability to deliver, operate and maintain its future proposed infrastructure.</p> <p>NGET will therefore require appropriate protection for retained or proposed infrastructure, including compliance with relevant standards for works proposed within close proximity of its apparatus or proposed apparatus.</p> <p>NGET's rights of access to inspect, maintain, renew and repair such apparatus must be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's apparatus, NGET will require appropriate protection. Further</p>	<p><u>Introduction</u></p> <p>The Applicant notes the comments and agrees on the interactions identified by National Grid Electricity Transmission (NGET).</p> <p><u>NGET's Statutory Duties</u></p> <p>The Applicant notes NGET's statutory duties and obligations.</p>

<p>discussion and agreement with the Applicant is required in relation to the impact on its apparatus and rights.</p>	
<p><u>Existing NGET Apparatus</u></p> <p>NGET owns and operates the following assets located within and in close proximity to the Order Limits for the Project. These assets form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets impacted are as follows:</p> <p>ZDA 400 kV OHL DRAX – KEADBY – THORPE MARSH DRAX – KEADBY – THORPE MARSH</p> <p><u>Future NGET Apparatus</u></p> <p>The following NGET New Infrastructure projects are known to be in close proximity to the Proposed Development:</p> <p>North Humber to High Marnham (NHHM) project</p> <p>The NHHM Project is a proposed 400 kV overhead line (the 4AF line) and associated works, approximately 90 km in length, running between two proposed substations, the Birkhill Wood substation in the East Riding of Yorkshire and a substation to be built at High Marnham in Nottinghamshire.</p> <p>The NHHM Project is required to increase the capability of the electricity transmission network between the north of England and the Midlands. It is also needed to facilitate the connection of proposed new offshore wind farms that are planned in the area.</p> <p>The NHHM Project is a Nationally Significant Infrastructure Project (“NSIP”) for which development consent will be required under the Planning Act 2008. NGET have previously consulted on proposals for the NHHM Project including a non-statutory consultation between June and July 2023 which provided an emerging preferred corridor and graduated swathe, a localised non-statutory consultation between July and August 2024 and a statutory consultation between February and April 2025.</p> <p>The NHHM Project is expected to submit its DCO application to the Planning Inspectorate in Q3 2026. If consent is granted by the Secretary of State then construction of the NHHM Project would begin in 2028 through to 2031 with some re-instatement works carrying on until 2033. The NHHM project is also considering a separate consenting process (outside the DCO) for some of the NHHM Project enabling works, with a view to accelerate such works to 2027 (if feasible).</p> <p>Other works, such as temporary access roads, highway works, temporary works compounds and utility diversions amongst others will be required to facilitate the construction of the NHHM Project as well as access routes for maintenance of the existing and proposed overhead lines.</p>	<p><u>Future NGET Apparatus</u></p> <p>The Applicant can confirm that the North Humber to High Marnham (NHHM) Project has been assessed as part of the Environmental Statement in terms of potential cumulative effects that may be produced in combination with the Scheme. The NHHM Project has been included as part of short list of identified schemes and can be seen in ES Appendix 17.2 Cumulative Short List [APP-127] as well as ES Chapter 17, Cumulative Effects [APP-054]. The Applicant notes that the construction period identified for the NHHM Project is stated to commence in 2028 and conclude in 2031. Despite the exact date for the construction period being unknown for the Scheme owing to ongoing grid connection reform, the Applicant is carrying out an environmental sensitivity test to consider the uncertainty regarding the construction period and will submit a document to report the findings of this work at Deadline 2.</p>

	<p>It is worth noting that there are proposed construction haul roads for the NHHM Project in key areas of the route where access by the road network is poor or limited. As the grid connection point for the proposed solar farm is not yet known, NHHM proposed construction haul roads may be affected should a grid connection point or cable route be proposed close to or within the NHHM order limits. Coordination between the projects would be required to minimise disruption to the NHHM Project during construction.</p> <p>There are no currently known direct interactions between the Project and the NHHM Project but there are likely to be cumulative impacts within the area of the NHHM Project such as construction overlap and construction vehicle access routes.</p> <p>NGET requires that all its existing and future assets, land, and rights are appropriately protected to ensure it can continue to meet its statutory obligations. This includes, but is not limited to, ensuring the deliverability of the NHHM Project. NGET remains committed to working with the Applicant in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible however NGET must have adequate protection for its future projects, including protection for future assets and the reservation of future land and rights necessary for the delivery of those projects. This is particularly important given that the Application does not include cable infrastructure and so the full interaction is not yet known</p>	
	<p><u>Grid Connection Arrangements</u></p> <p>The Grid Connection Statement (EN010148-000414-5.8) submitted by the Applicant states that the Project will connect to a new NGET 400 kV substation, which is to be consented and delivered separately by NGET (however note the comment below that NGET are not currently developing proposals to build a new substation). It is clear that the 400 kV export connection cable required to connect the Project into the electricity transmission network is not included within the DCO application, as the connection point is not yet confirmed. The draft DCO includes powers for cables from the Project’s on-site 400 kV substation to the Order Limits only.</p> <p>The Grid Connection Statement states that the Applicant expects that NGET will be responsible for designing and building the 400 kV export connection cable based on previous experience and as the transmission licence holder. However, the 400 kV export connection cable could also be designed and built by the Applicant.</p> <p>Section 2.12.1a of the Connection and Use of System Code confirms the electrical ownership boundary for a generator is at the NGET busbar within the substation. As a generator, the Applicant is required to seek consent for, build and maintain all assets up to this point including the substation bay and any cables between the generating site and NGET substation.</p> <p>NGET wishes to make clear that NGET is not responsible for the connection cable between the Project and any NGET substation. NGET is not currently proposing to construct a new substation in this area.</p>	<p><u>Grid Connection Arrangements</u></p> <p>The Applicant notes that at the Issue Specific Hearing 1 held 15 April 2026, the Examining Authority sought clarity regarding NGET’s statement in their Relevant Representation that “NGET is not currently proposing to construct a new substation in this area.” The Applicant can confirm that discussions continue to take place with NGET and collaboration has been ongoing since the inception of the Scheme. The list of meetings regarding the point of connection and the Scheme are presented within the NGET Statement of Comon Ground [Document Reference 9.1 Revision 1].</p> <p>Regarding the responsibility for the design and building the 400kV export connection cable, the Applicant notes the comment from NGET and has amended the text within the Grid Connection Statement [Document Reference 5.8, Revision 3]. The Applicant makes reference to Annex 1 of the Applicant’s Written Summary of Oral Submissions made at Issue Specific Hearing 1 (Document Reference 8.5) which presents a detailed explanation of the position and wider policy and regulatory context.</p>

	<p>NGET urges the Applicant to confirm, in their connection agreement with NESO, the connection point, the precise roles and responsibilities for the design, construction, and operation of the 400 kV export connection cable and bay. This is essential to avoid ambiguity and ensure that all parties' statutory and operational requirements are met.</p>	
	<p><u>Protection of NGET Assets</u></p> <p>NGET requires robust Protective Provisions to be included within the draft DCO for the Project. These provisions must ensure that all NGET assets are adequately protected and that all works by the Applicant comply with relevant safety standards. There is clear precedent for the protection of future assets within DCOs, including the Protective Provisions secured by NGET in the Awel Y Mor DCO, and those agreed with the undertaker in relation to the Outer Dowsing Offshore Wind DCO, which is awaiting the Secretary of State's decision.</p> <p>NGET is liaising with the Applicant in relation to such Protective Provisions. Accordingly, NGET has not appended the version of the Protective Provisions it requires to be included in the Order to this Relevant Representation. However, NGET will submit these at Written Representation Stage, if not agreed between the parties by that point, with an explanation of any outstanding issues.</p> <p>NGET requests that the Applicant continues to engage with it in relation to how the Applicant's works pursuant to the Order (if made) will ensure protection for those proposed NGET assets, along with facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations. NGET will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO application examination and will keep the Examining Authority updated in relation to these discussions.</p> <p>NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with any NGET projects identified during the Examination process, and as negotiations continue, but in the meantime will continue to liaise with the Project with a view to reaching a satisfactory agreement during the Examination process and will keep the Examining Authority updated in relation to these discussions.</p>	<p><u>Protection of NGET Assets</u></p> <p>The Applicant can confirm that ongoing dialogue is shaping the protective provisions with NGET to protect NGETs assets and that the Applicant will continue to engage with NGET to seek to agree the protective provisions prior to the close of the examination.</p>
	<p><u>Compulsory Acquisition Powers in Respect of the Project</u></p> <p>Where the Applicant seeks powers of compulsory acquisition over NGET land, or land in which NGET holds rights or apparatus, the Protective Provisions must require the Applicant to obtain NGET's prior written consent to the exercise of such powers.</p>	<p><u>Compulsory Acquisition Powers in Respect of the Project</u></p> <p>The Applicant notes the comments made by NGET on obtaining written consent in relation to exercising compulsory acquisition powers. This matter will form part of ongoing discussions in respect of NGET's protective provisions.</p>

10 Table 10-1 Humberside Police Representations

Consultee	Representation	Applicant's Response
<p>Humberside Police</p>	<p>I am the Designing Out Crime Officer covering the North Lincolnshire area and represent Humberside Police in all planning matters. Recently, I have been made aware of the Tween Bridge Solar farm proposal.</p> <p>I would be grateful if you will consult with me on all aspects of this application. Concerns have been raised regarding criminal activity and attacks nationally on this type of development, with some attacks linked to Organised Crime Groups (OCGs). Recently there has been a huge spike with regards to plant theft within the Humberside and Yorkshire regions.</p> <p>Humberside Police have concerns around potential criminality within this proposed development, therefore we would like to provide positive feedback on the proposals and designs, in-particular during the construction phase and when the development is complete.</p> <p>As such, Humberside Police would like to be an interested party in relation to crime prevention and security measures that the developer considers vital for this proposed site. This is particularly important in relation to the locations of high-risk infrastructure within our policing area.</p>	<p>The Applicant thanks Humberside Police for its comments and engagement on the Scheme to date. Security has been a key consideration in the design of the Scheme from the outset. The following design aspects can be noted below:</p> <p>Fencing and Security: Operational areas of the site will be enclosed with 2m wire and post deer fencing—while the 132kV Substations and the 400kV on-site Substation will be secured with 2.4m palisade fencing as seen in ES Volume 4, Indicative Layouts and Cross Section Plan [APP-015]. The design has responded the potential crime risk and prevent unauthorised access. The detailed design of permanent and temporary fencing will be submitted and approved by the local authority prior to commencement of development as part of Requirement 9 of the Draft DCO [Document Reference 3.1 Revision 3].</p> <p>Cable and Solar Panel Protection: The Applicant recognises the importance of securing cable drums overnight, promptly installing cables, and applying serial numbers, ownership details, and forensic marking. During construction, the principal contractor will be responsible for securing all stored materials and equipment. Measures will include secure storage, lighting systems, CCTV, hazard warning signs, and regular patrols by site security staff. Additional measures such as cable guards and anti -theft fixtures will be implemented where appropriate. The final Construction Environmental Management Plan must be substantially in accordance with the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 1] and needs to be approved by the local planning authority before construction commences, as secured by Requirement 14 of the Draft DCO [Document Reference 3.1 Revision 3].</p> <p>Equipment and Tool Security: Temporary compounds will be established within each land parcel for storing materials, plant, and equipment. These compounds will be equipped with CCTV, lighting, alarm systems, and secure storage and secured by requirement 14 of the Draft DCO [Document Reference 3.1 Revision 3]. Forensic marking, asset logs with serial numbers, and the use of third -party</p>

		<p>locking devices will also be employed. Site security staff and warning signage will be present, and keys will be stored securely and separately from equipment.</p> <p>The Applicant has contacted Humberside Police to discuss any detailed comments they have on the proposals.</p>
--	--	--

11 Table 11-1 Doncaster East Internal Drainage Board Representations

Consultee	Representation	Applicant's Response
<p>Doncaster East Internal Drainage Board</p>	<p>With regard to the request for consultation response regarding the above project I would advise that the proposed development crosses areas under the control of Doncaster East Internal Drainage Board.</p> <p>There are numerous watercourses that are likely to be impacted by the development, principally by the proposed route of the Cable but also potentially above ground installations and accommodation works. I feel that it is important to raise some specific issues that will need to be considered further and in detail as a part of the DCO process.</p> <p>All Board watercourses are subject to Byelaws, which are intended to protect the watercourses and the Board's ability to maintain them. With this in mind I would advise the following.</p> <p>Byelaw Number 3 states that:</p> <p>No person shall as a result of development (within the meaning of section 55 of the Town and Country Planning Act 1990 as amended ("the 1990 Act")) (whether or not such development is authorised by the 1990 Act or any regulation or order whatsoever or none of them) for any purpose by means of any channel, siphon, pipeline or sluice or by any other means whatsoever introduce any water into any watercourse in the District so as to directly or indirectly increase the flow or volume of water in any watercourse in the District (without the previous consent of the Board)."</p> <p>Consent will only be granted for the increase in flow to a watercourse where the Board is happy that in doing so no demonstrable harm will be caused. It may be the case that appropriate mitigations are required to be put in place to either attenuate flow or to enhance the existing watercourse to ensure no detriment. If this is not possible alternative outfall locations may need to be considered.</p> <p>Byelaw Number 10 states that:</p> <p>No person without the previous consent of the Board shall erect any building or structure, whether temporary or permanent, or plant any tree, shrub, willow or other similar growth within nine metres of the landward toe of the bank where there is an embankment or wall or within nine metres of the top of the batter where there is no embankment or wall, or where the watercourse is enclosed within nine metres of the enclosing structure.</p> <p>This Byelaw will relate primarily to any above ground installations including buildings (substations), compounds, fencing or planting and their proximity to any Board maintained watercourses.</p>	<p>Article 9 of the Draft DCO [Document Reference 3.1 Revision 3] disapplies a number of statutory provisions. Section 120(5) of the 2008 Act provides that, subject to specified limitations and requirements, a DCO may apply, modify, or exclude a statutory provision which relates to any matter for which provision may be made in the Order; and make amendments, repeals, or revocations of statutory provisions of local application. It is common for DCOs to contain such provisions, although the scope and content inevitably differs according to the circumstances of different projects.</p> <p>This article provides for the disapplication of the provisions of any byelaws made under section 66 of the Land Drainage Act 1991 and those made under, or having effect as if made under, paragraphs 5, 6 or 6A of Schedule 25 to the Water Resources Act 1991.</p> <p>The byelaws referenced were made under and by virtue of the powers and authority vested in Doncaster East Internal Drainage Board by Section 66 of the Land Drainage Act 1991. As such, Article 9 of the Draft DCO [Document Reference 3.1 Revision 3] disapplies them.</p> <p>In lieu of these protections, the Applicant is required to comply with articles within the Draft DCO [Document Reference 3.1 Revision 3] and the provided protective provisions, at Schedule 14, Part 3, for the benefit of drainage authorities and these provisions provide robust protection to Doncaster East Internal Drainage Board.</p> <p>Byelaw Number 3</p> <p>Doncaster East Internal Drainage Board has referenced its Byelaw Number 3 which controls the discharge of water. The undertaker adheres to this concept via Article 19 of the Draft DCO [Document Reference 3.1 Revision 3] which sets out that the Applicant: "must not discharge any water into any watercourse, public sewer or drain except with the consent of the person to whom it belongs, whose consent may be given subject to terms and conditions as that person may reasonably impose but must not be unreasonably withheld or delayed."</p>

	<p>Byelaw number 17 states that:</p> <p>No person shall without the previous consent of the Board –</p> <p>(a) place or affix or cause or permit to be placed or affixed any gas or water main or any pipe or appliance whatsoever or any electrical main or cable or wire in, under or over any watercourse or in, over or through any bank of any watercourse;</p> <p>(b) cut, pare, damage or remove or cause or permit to be cut, pared, damaged or removed any turf forming part of any bank of any watercourse, or dig for or remove or cause or permit to be dug for or removed any stone, gravel, clay, earth, timber or other material whatsoever forming part of any bank of any watercourse or do or cause or permit to be done anything in, to or upon such bank or any land adjoining such bank of such a nature as to cause damage to or endanger the stability of the bank;</p> <p>(c) make or cut or cause or permit to be made or cut any excavation or any tunnel or any drain, culvert or other passage for water in, into or out of any watercourse or in or through any bank of any watercourse;</p> <p>(d) erect or construct or cause or permit to be erected or constructed any fence, post, pylon, wall, wharf, jetty, pier, quay, bridge, loading stage, piling, groyne, revetment or any other building or structure whatsoever in, over or across any watercourse or in or on any bank thereof;</p> <p>(e) place or fix or cause or permit to be placed or fixed any engine or mechanical contrivance whatsoever in, under or over any watercourse or in, over or on any bank of any watercourse in such a manner or for such length of time as to cause damage to the watercourse or banks thereof or obstruct the flow of water in, into or out of such watercourse.</p> <p>Provided that this Byelaw shall not apply to any temporary work executed in an emergency but a person executing any work so excepted shall, as soon as practicable, inform the Board in writing of the execution and of the circumstances in which it was executed and comply with any reasonable directions the Board may give with regard thereto.</p> <p>The Board will require all watercourses to be crossed by means of an appropriate trenchless method at a depth no less than 2 metres PLUS the safe working distance below the hard bed level of all watercourses (to ODN if EA or IDB maintained). The purpose of this requirement is to allow the IDB to maintain and have the flexibility to improve watercourses in the future due to climate change (works will include deepening & widening of watercourses).</p> <p>Any culverting or other works within the bed of any Board maintained watercourse be they temporary or permanent will require consent. It will usually be assumed that these structures will be temporary measures to accommodate haul roads etc.</p>	<p>As such, the Applicant considers the disapplication of byelaw 3 does not give rise to concerns, because these matters are addressed by provisions of the Draft DCO instead.</p> <p>Byelaw Number 10</p> <p>Doncaster East Internal Drainage Board has referenced its Byelaw Number 10 which controls works within 9m of the Board maintained watercourses. A high degree of protection is afforded to Doncaster East Internal Drainage Board via Schedule 14, Part 3 of the Draft DCO [Document Reference 3.1 Revision 3] which would control works within this distance.</p> <p>As such, the Applicant considers that the proposed disapplication of byelaw 10 would not undermine the standard controls imposed by the Board via that byelaw, as the protection is afforded by the Draft DCO instead.</p> <p>Byelaw Number 17</p> <p>Doncaster East Internal Drainage Board has referenced its Byelaw Number 17 which controls works in proximity to the Board maintained watercourses. The undertaker provides a high degree of protection to Doncaster East Internal Drainage Board via Schedule 14, Part 3 of the Draft DCO [Document Reference 3.1 Revision 3] which via paragraphs 20 and 21 ensures that Doncaster East Internal Drainage Board retain the ability to approve details of any works in proximity to the Board maintained watercourses.</p> <p>As such, the Applicant considers that the proposed disapplication of byelaw 10 would not undermine the standard controls imposed by the Board via that byelaw, as the protection is afforded by the Draft DCO instead.</p> <p>The Applicant considers that the protective provisions included at Schedule 14, Part 3 of the Draft DCO [Document Reference 3.1</p>
--	---	--

	<p>It is anticipated that the above requirements would be covered by SOCGs, MOU, and via Protective Provisions within the DCO. This matter should be discussed further and in more detail as the proposed route is refined.</p> <p>Any culverting or other works within the bed of any riparian watercourse within the Board’s district or extended area, be they temporary or permanent will also require consent.</p> <p>It should be noted that the Board’s consent is required irrespective of any permission gained under the Town and Country Planning Act 1990. The Board’s consent will only be granted where proposals are not detrimental to the flow or stability of the watercourse/ culvert or the Board’s machinery access to the watercourse/ culvert which is required for annual maintenance, periodic improvement and emergency works. The Board would not look to be disapplying these powers unless they have been suitably agreed and covered within the protected provisions embedded within the DCO.</p> <p>I hope that the above is of assistance and I look forward to further ongoing detailed discussions with regard to the proposal.</p>	<p>Revision 3] for the benefit of drainage authorities provides adequate protection to Doncaster East Internal Drainage Board.</p> <p>The Applicant has attempted to contact Doncaster East Internal Drainage Board requesting comments on the protective provisions for the benefit of drainage authorities at Schedule 14, Part 3 of the Draft DCO [Document Reference 3.1 Revision 3].</p> <p>The Applicant sent emails to Doncaster East Internal Drainage Board on 23 February, 9 March, 27 March, 2 April and 30 April but has not yet received a response from Doncaster East Internal Drainage Board yet. The Applicant looks forward to receiving comments.</p>
--	---	--

12 Table 12-1 Isle of Axholme & North Nottinghamshire Water Level Management Board Representations

Consultee	Representation	Applicant’s Response
<p>Isle of Axholme & North Nottinghamshire Water Level Management Board (IANWLMB)</p>	<p>With regard to the request for consultation response regarding the above project I would advise that the proposed development crosses areas under the control of Doncaster East Internal Drainage Board.</p> <p>There are numerous watercourses that are likely to be impacted by the development, principally by the proposed route of the Cable but also potentially above ground installations and accommodation works. I feel that it is important to raise some specific issues that will need to be considered further and in detail as a part of the DCO process.</p> <p>All Board watercourses are subject to Byelaws, which are intended to protect the watercourses and the Board’s ability to maintain them. With this in mind I would advise the following.</p> <p>Byelaw Number 3 states that:</p> <p>No person shall as a result of development (within the meaning of section 55 of the Town and Country Planning Act 1990 as amended (“the 1990 Act”)) (whether or not such development is authorised by the 1990 Act or any regulation or order whatsoever or none of them) for any purpose by means of any channel, siphon, pipeline or sluice or by any other means whatsoever introduce any water into any watercourse in the District so as to directly or indirectly increase</p>	<p>Article 9 of the Draft DCO [Document Reference 3.1 Revision 3] disapplies a number of statutory provisions. Section 120(5) of the 2008 Act provides that, subject to specified limitations and requirements, a DCO may apply, modify, or exclude a statutory provision which relates to any matter for which provision may be made in the Order; and make amendments, repeals, or revocations of statutory provisions of local application. It is common for DCOs to contain such provisions, although the scope and content inevitably differs according to the circumstances of different projects.</p> <p>This article provides for the disapplication of the provisions of any byelaws made under section 66 of the Land Drainage Act 1991 and those made under, or having effect as if made under, paragraphs 5, 6 or 6A of Schedule 25 to the Water Resources Act 1991.</p> <p>The byelaws referenced were made under and by virtue of the powers and authority vested in IANWLMB by Section 66 of the Land Drainage Act 1991. As such, Article 9 of the Draft DCO [Document Reference 3.1 Revision 3]disapplies them.</p>

	<p>the flow or volume of water in any watercourse in the District (without the previous consent of the Board)."</p> <p>Consent will only be granted for the increase in flow to a watercourse where the Board is happy that in doing so no demonstrable harm will be caused. It may be the case that appropriate mitigations are required to be put in place to either attenuate flow or to enhance the existing watercourse to ensure no detriment. If this is not possible alternative outfall locations may need to be considered.</p> <p>Byelaw Number 10 states that:</p> <p>No person without the previous consent of the Board shall erect any building or structure, whether temporary or permanent, or plant any tree, shrub, willow or other similar growth within nine metres of the landward toe of the bank where there is an embankment or wall or within nine metres of the top of the batter where there is no embankment or wall, or where the watercourse is enclosed within nine metres of the enclosing structure.</p> <p>This Byelaw will relate primarily to any above ground installations including buildings (substations), compounds, fencing or planting and their proximity to any Board maintained watercourses.</p> <p>Byelaw number 17 states that:</p> <p>No person shall without the previous consent of the Board –</p> <p>(a) place or affix or cause or permit to be placed or affixed any gas or water main or any pipe or appliance whatsoever or any electrical main or cable or wire in, under or over any watercourse or in, over or through any bank of any watercourse;</p> <p>(b) cut, pare, damage or remove or cause or permit to be cut, pared, damaged or removed any turf forming part of any bank of any watercourse, or dig for or remove or cause or permit to be dug for or removed any stone, gravel, clay, earth, timber or other material whatsoever forming part of any bank of any watercourse or do or cause or permit to be done anything in, to or upon such bank or any land adjoining such bank of such a nature as to cause damage to or endanger the stability of the bank;</p> <p>(c) make or cut or cause or permit to be made or cut any excavation or any tunnel or any drain, culvert or other passage for water in, into or out of any watercourse or in or through any bank of any watercourse;</p> <p>(d) erect or construct or cause or permit to be erected or constructed any fence, post, pylon, wall, wharf, jetty, pier, quay, bridge, loading stage, piling, groyne, revetment or any other building or structure whatsoever in, over or across any watercourse or in or on any bank thereof;</p> <p>(e) place or fix or cause or permit to be placed or fixed any engine or mechanical contrivance whatsoever in, under or over any watercourse or in, over or on any bank of any watercourse in</p>	<p>In lieu of these protections, the Applicant is required to comply with the articles of the Draft DCO [Document Reference 3.1 Revision 3] and the protective provisions, at Schedule 14, Part 3, for the benefit of drainage authorities and these provisions provide robust protection to IANWLMB.</p> <p>Byelaw Number 3</p> <p>IANWLMB has referenced its Byelaw Number 3 which controls the discharge of water. The undertaker adheres to this concept via Article 19 of the Draft DCO [Document Reference 3.1 Revision 3] which sets out that the Applicant: "must not discharge any water into any watercourse, public sewer or drain except with the consent of the person to whom it belongs, whose consent may be given subject to terms and conditions as that person may reasonably impose but must not be unreasonably withheld or delayed."</p> <p>As such, the Applicant considers the disapplication of byelaw 3 does not give rise to concerns, because these matters are addressed by provisions of the Draft DCO.</p> <p>Byelaw Number 10</p> <p>IANWLMB has referenced its Byelaw Number 10 which controls works within 9m of the Board maintained watercourses. A high degree of protection is afforded to IANWLMB via Schedule 14, Part 3 of the Draft DCO [Document Reference 3.1 Revision 3] which would control works within this distance.</p> <p>As such, the Applicant considers that the proposed disapplication of byelaw 10 would not undermine the standard controls imposed by the Board via that byelaw, as the protection is afforded by the Draft DCO instead.</p> <p>Byelaw Number 17</p> <p>IANWLMB has referenced its Byelaw Number 17 which controls works in proximity to the Board maintained watercourses. The undertaker provides a high degree of protection to IANWLMB via Schedule 14, Part 3 of the Draft DCO [Document Reference 3.1 Revision 3] which via paragraphs 20 and 21 ensures that IANWLMB retain the ability to approve details of any works in proximity to the Board maintained watercourses.</p> <p>As such, the Applicant considers that the proposed disapplication of byelaw 10 would not undermine the standard controls imposed by</p>
--	---	--

	<p>such a manner or for such length of time as to cause damage to the watercourse or banks thereof or obstruct the flow of water in, into or out of such watercourse.</p> <p>Provided that this Byelaw shall not apply to any temporary work executed in an emergency but a person executing any work so excepted shall, as soon as practicable, inform the Board in writing of the execution and of the circumstances in which it was executed and comply with any reasonable directions the Board may give with regard thereto.</p> <p>The Board will require all watercourses to be crossed by means of an appropriate trenchless method at a depth no less than 2 metres PLUS the safe working distance below the hard bed level of all watercourses (to ODN if EA or IDB maintained). The purpose of this requirement is to allow the IDB to maintain and have the flexibility to improve watercourses in the future due to climate change (works will include deepening & widening of watercourses).</p> <p>Any culverting or other works within the bed of any Board maintained watercourse be they temporary or permanent will require consent. It will usually be assumed that these structures will be temporary measures to accommodate haul roads etc.</p> <p>It is anticipated that the above requirements would be covered by SOCGs, MOU, and via Protective Provisions within the DCO. This matter should be discussed further and in more detail as the proposed route is refined.</p> <p>Any culverting or other works within the bed of any riparian watercourse within the Board's district or extended area, be they temporary or permanent will also require consent.</p> <p>It should be noted that the Board's consent is required irrespective of any permission gained under the Town and Country Planning Act 1990. The Board's consent will only be granted where proposals are not detrimental to the flow or stability of the watercourse/ culvert or the Board's machinery access to the watercourse/ culvert which is required for annual maintenance, periodic improvement and emergency works. The Board would not look to be disapplying these powers unless they have been suitably agreed and covered within the protected provisions embedded within the DCO.</p> <p>I hope that the above is of assistance and I look forward to further ongoing detailed discussions with regard to the proposal</p>	<p>the Board via that byelaw, as the protection is afforded by the Draft DCO instead.</p> <p>The Applicant considers that the protective provisions included at Schedule 14, Part 3 of the Draft DCO [Document Reference 3.1 Revision 3] for the benefit of drainage authorities provides adequate protection to IANWLMB.</p> <p>The Applicant has attempted to contact IANWLMB requesting comments on the protective provisions for the benefit of drainage authorities at Schedule 14, Part 3 of the Draft DCO [Document Reference 3.1 Revision 3].</p> <p>The Applicant awaits confirmation that IANWMLB are satisfied with the protection offered.</p>
--	---	--

13 Table 13-1 Network Rail Infrastructure Limited Representation

Consultee	Representation	Applicant's Response
<p>Representation by Addleshaw Goddard LLP on behalf of Network Rail Infrastructure Limited</p>	<p>APPLICATION BY RWE RENEWABLES UK SOLAR AND STORAGE LIMITED FOR THE TWEEN BRIDGE SOLAR FARM DEVELOPMENT CONSENT ORDER 202[x]</p> <p>PLANNING INSPECTORATE REFERENCE: EN010148</p> <p>SECTION 56 PLANNING ACT 2008: RELEVANT REPRESENTATION OF NETWORK RAIL INFRASTRUCTURE LIMITED</p> <p>This is the section 56 representation of Network Rail Infrastructure Limited (Network Rail) provided in respect of RWE Renewables UK Solar and Storage Limited's (the Promoter) application for a development consent order (the Order) for the construction of the Tween Bridge Solar Farm (the Scheme). Network Rail is a statutory undertaker and owns, operates and maintains the majority of the rail infrastructure of Great Britain (the Railway).</p> <p>The Order sought by the Promoter includes development consent for the construction, operation, management and decommissioning of a ground mounted solar photovoltaic (PV) electricity generating facility exceeding 50 megawatt (MW) output capacity, together with associated works including substation, energy storage and green infrastructure.</p> <p>The Promoter seeks authority and powers in the draft Order to permanently acquire rights over land in the ownership and occupation of Network Rail as summarised below:</p> <ol style="list-style-type: none"> 1. Plot 3/24 - Permanent Acquisition of New Rights over 10605 square metres of railway forming part of the South Humber side Main Line lying to the north of Sandhill Farm, Scunthorpe Road, Thorne, Doncaster (Network Rail is the Freehold Owner). <p>Network Rail wishes to ensure that the Scheme will not have a detrimental impact on the operation of the Railway and that the safety of the Railway is maintained during the construction, operation and ongoing maintenance requirements of the Scheme.</p> <p>As the Promoter proposes to compulsorily acquire new rights over railway land as well in close proximity to railway assets, Network Rail hereby objects to the making of the Order in principle on the ground that the powers sought are likely to interfere with the safe and efficient operation of the Railway and cause a serious detriment to the carrying on of Network Rail's statutory undertaking.</p> <p>Although Network Rail acknowledges that the Promoter has included a form of protective provisions in the draft development consent order (document 3.1), the form of these provisions is unacceptable to Network Rail. In particular, the Promoter's form of provisions are deficient as they omit key protections regarding the Promoter's exercise of compulsory acquisition rights, specifically those contained at</p>	<p>The Applicant is in ongoing discussions with Network Rail regarding protective provisions and will continue to engage with Network Rail to seek to agree protective provisions for protection of its interests prior to the close of examination.</p>

	<p>paragraph 4 of the provisions at Appendix 1 to this Representation. This omission (along others) is of particular concern to Network Rail, given the Promoter is proposing to compulsorily acquire rights over operational railway track. Should Network Rail be unable to ensure the new rights sought are exercised in regulated manner to prevent adverse impacts to the Railway, this poses a real risk to Network Rail's ability to safely operate the railway.</p> <p>In order for Network Rail to be in a position to withdraw its objection Network Rail will require adequate protective provisions to be included within the Order (and for the avoidance of doubt Network Rail require these Protective Provisions to be in the form set out at Appendix 1 to this Relevant Representation) and an agreement with the Promoter to ensure that the new rights sought are exercised in regulated manner to prevent adverse impacts to the Railway.</p> <p>Network Rail is continuing to review the Promoter's plans, draft Order and application documents, and will continue to work constructively with the Promoter to clarify any issues raised. The Examining Authority and the Secretary of State will need to be satisfied that railway safety and operations will not be compromised by the making of the Order.</p> <p>Network Rail hereby requests that the Examining Authority treats Network Rail as an Interested Party for the purposes of the Examination and Network Rail reserves the right to produce additional and further grounds of concern when further details of the Scheme and its effects on Network Rail's assets are available.</p> <p>Appendix 1</p> <p>Protective Provisions for the benefit of Network Rail</p> <p>SCHEDULE 13 PART 8 PROTECTIVE PROVISIONS FOR THE PROTECTION OF RAILWAY INTERESTS</p>	
--	---	--

14 Table 14-1 Northern Powergrid (Yorkshire) Plc Representation

Consultee	Representation	Applicant's Response
<p>Weightmans LLP on behalf of Northern Powergrid (Yorkshire) Plc</p>	<p>The following representations are submitted on behalf of Northern Powergrid (Yorkshire) Plc ('Northern Powergrid') as an electricity undertaker for the area within which the Tween Bridge Solar Farm Scheme is located: Northern Powergrid is in principle supportive of the above project but has concerns regarding the impacts that the proposed scheme will have on existing assets and their pending improvement works. Areas shown within the proposed development boundary have a direct impact on Northern Powergrid's existing critical national infrastructure which serve significant numbers of customers in the local and wider area, and the rights for these assets are essential in maintaining an uninterrupted power supply to the customers they serve. Northern Powergrid has a statutory duty to provide its customers with an uninterrupted supply of electricity and thus rightly raises concerns to any scheme that would result in a breach to its duty. In</p>	<p>The Applicant is in ongoing discussions with Northern Powergrid regarding protective provisions and will continue to engage with Northern Powergrid to seek to agree protective provisions for the protection of its interests prior to the close of the examination.</p>

	<p>particular, the proposed development seeks to interfere with Northern Powergrid’s existing apparatus, access to such apparatus and servicing rights which are vital for Northern Powergrid’s existing operations. Northern Powergrid therefore reserves the right to review the position as the scheme progresses and protect its existing apparatus including with bespoke protective provisions in the Order, as at this stage, the specific details of the DCO infrastructure including the depth, diameter and respective easement strips are unknown. Northern Powergrid’s existing apparatus may need to be diverted to accommodate the DCO project and therefore Northern Powergrid requires bespoke protective provisions to protect its position and recover the costs of any required diversions or relocations. Northern Powergrid also has concerns over the currently proposed protective provisions contained within the draft Order as they do not take into account site specific issues and do not accord with Northern Powergrid’s standard protective provision requirements. The compulsory purchase powers incorporated into the DCO seeks to acquire land and interests which, if acquired, would adversely affect Northern Powergrid’s ability to use, access, maintain and where necessary upgrade its equipment. It is not necessary to acquire these interests where an agreement between the parties would be more appropriate. Northern Powergrid is keen to discuss its concerns with RWE Renewables UK Solar and Storage Limited (‘the Applicant’) to reduce the project’s impacts on Northern Powergrid’s apparatus and agree bespoke protective provisions within the draft Order.</p>	
--	---	--

15 Table 15-1 UK Health & Safety Agency Representation

Consultee	Representation	Applicant’s Response
<p>UK Health Security Agency</p>	<p>Thank you for your consultation regarding the above development. The UK Health Security Agency (UKHSA) welcomes the opportunity to comment on your proposals at this stage of the project. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID. We can confirm that:</p> <p>With respect to Registration of Interest documentation, we are reassured that earlier comments raised by us on 6 May 2025, 29 November 2023 and 22 February 2023 have been addressed. In addition, we acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly affect public health.</p> <p>Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health. On that basis, we have no additional comments to make at this stage and can confirm that we have chosen NOT to register an interest with the Planning Inspectorate on this occasion.</p> <p>Please do not hesitate to contact us if you have any questions or concerns.</p>	<p>The Applicant agrees with the comments provided.</p>

16 Table 16-1 Cadent Gas Ltd Representation

Consultee	Representation	Applicant's Response
<p>Cadent Gas Ltd</p>	<p>Representation on behalf of Cadent Gas Limited (Cadent) to the Tween Bridge Solar Farm Development Consent Order (DCO). Cadent is a licensed gas transporter under the Gas Act 1986, granted pursuant to section 7 of the Gas Act 1986. Through the Gas Transporter Licence, Cadent operates and maintains the gas distribution networks in the North-West, West Midlands, East of England and North London, with corresponding statutory and regulatory obligations enforced by Ofgem. Cadent's primary duties are to operate, maintain and develop its networks in an economic, efficient, and coordinated way. Cadent wishes to make a relevant representation to the proposed DCO in order to protect its position in light of infrastructure which is within or in close proximity to the proposed DCO boundary. Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits including should be maintained at all times and access to inspect such apparatus must not be restricted.</p> <p>The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on Cadent's existing apparatus located within this area, and Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards. Cadent has gas pipelines and associated apparatus located within the order limits which are affected by works proposed (as noted in the Book of Reference), the extent to which is still being assessed and which may require diversions subject to the impact. Any proposed diversions have not yet reached detailed design stage and so the positioning, land rights and consents required for these gas diversions are not confirmed.</p> <p>At this stage, Cadent is not satisfied that the DCO includes all land and rights required to accommodate such diversions as design studies will need to influence these requirements. Cadent will not decommission its existing apparatus and/or commission new apparatus until it has sufficient land and rights in land (to its satisfaction) to do so, whether pursuant to the DCO or otherwise. This is a fundamental matter of health and safety. At this stage, Cadent is not satisfied that the tests under section 127 of the Planning Act 2008 can be met. Cadent has experience of promoters securing insufficient rights in land within DCOs for necessary diversions of its apparatus or securing rights for the benefit of incorrect entities. It is important that sufficient rights are granted to Cadent to allow Cadent to maintain its gas distribution network in accordance with its statutory obligations.</p> <p>As a responsible statutory undertaker, Cadent's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. Whilst the project interacts with Cadent's apparatus, the draft DCO does not include a form of protective provisions for Cadent's benefit and adequate protective provisions for the protection of Cadent's statutory undertaking have not yet been agreed but are</p>	<p>The Applicant is in ongoing discussion with Cadent Gas regarding protective provisions and will continue to engage with them to seek to agree protective provisions for the protection of Cadent's interests prior to the close of the examination.</p>

	<p>in discussion between parties. Protective provisions for the benefit of Cadent’s statutory undertakings have been included in a number of recently made DCOs, including The Viking CCS Carbon Dioxide Pipeline Order 2025 which came into force on 1 May 2025 and The Oaklands Farm Solar Park Order 2025 which came into force on 11 July 2025, and Cadent’s preferred form of protective provisions for inclusion within the DCO are included at Appendix 1. Cadent requests that these are included at Part 9 of Schedule 13 to the DCO. The substance of these protective provisions is consistent with other protective provisions included in the Applicant’s draft DCO and with the requirement for security provisions in respect of potential liabilities secured at Article 47 of the Applicant’s draft DCO.</p> <p>The explanatory memorandum does not explain why protective provisions have not been included for Cadent’s benefit or justify the departure from Cadent’s requirement that the preferred form of protective provisions are included in the DCO. The Applicant’s approach is not consistent with section 3.1.4 of the Guidance Nationally Significant Infrastructure Projects – Advice Note Fifteen: drafting Development Consent Orders Updated 24 March 2025 (Advice Note Fifteen). Cadent has not been able to make positive progress with the promoter and has not yet reached satisfactory agreement. Cadent’s solicitors have sought to engage with the Applicant in respect of the protective provisions over a significant period of time with no substantive response from the Applicant. Cadent’s preferred form of protective provisions, which are included on a number of made DCOs as identified above and which are widely used in DCOs, were provided to the Applicant in the summer. Cadent wishes to reserve the right to make further representations as part of the examination process but will continue to seek to engage with the promoter to reach a satisfactory agreement. Cadent will keep the examining authority updated in this regard.</p>	
--	--	--

17 Table 17–1 South Yorkshire Police Representation

Consultee	Comments	Applicant’s Response
South Yorkshire Police	<p>I am currently a Designing Out Crime Officer with South Yorkshire Police covering the area of Thorne and the surrounding borders within the Doncaster district. Recently, I have been made aware of the Tween bridge Solar farm proposal. As you may be aware attacks on such sites nationally are increasing with some attacks linked to organised crime groups.</p> <p>Over the years a similar solar farm site in the Doncaster area have suffered attacks, which include thefts of solar panels and thefts of copper connectors from within the site and damage to the solar panels themselves. At one stage, thefts and damage have occurred to such an extent that it has reduced the capability of the site to operate at full capacity. The proposed site will be situated near this existing Solar farm expanding out into the countryside towards Lincolnshire. Due to this South Yorkshire Police have concerns around potential criminality during the construction phase and when the development is completed.</p>	<p>The Applicant thanks South Yorkshire Police for their comments and engagement on the Scheme to date. Security has been a key consideration in the design of the Scheme from the outset. The following design aspects can be noted below:</p> <p>Fencing and Security: Operational areas of the site will be enclosed with 2m wire and post deer fencing—while the 132kV Substations and the 400kV on-site Substation will be secured with 2.4m palisade fencing as seen in ES Volume 4, Indicative Layouts and Cross Section Plan [APP-015]. The design has responded to the potential crime risk and would prevent unauthorised access. The detailed design of permanent and temporary fencing will be submitted and approved by the local authority prior to</p>

	<p>As such, I would like to be an interested party in relation to crime prevention and security measures that the developer considers vital for this proposed site. This is particularly important in relation to the locations of high-risk infrastructure within the amended draft order.</p> <p>Kind Regards</p> <p>(Redacted)</p> <p>Designing Out Crime Officer. South Yorkshire Police Doncaster South Yorkshire DN1 3HX E-mail: (Redacted)@southyorkshire.police.uk</p>	<p>commencement of development as part of Requirement 9 of Draft DCO [Document Reference 3.1 Revision 3].</p> <p>Cable and Solar Panel Protection: The Applicant recognises the importance of securing cable drums overnight, promptly installing cables, and applying serial numbers, ownership details, and forensic marking. During construction, the principal contractor will be responsible for securing all stored materials and equipment, and details would be secured through requirement 14 of the Draft DCO [Document Reference 3.1 Revision 3]. Measures will include secure storage, lighting systems, CCTV, hazard warning signs, and regular patrols by site security staff. Additional measures such as cable guards and anti -theft fixtures will be implemented where appropriate.</p> <p>Equipment and Tool Security: Temporary compounds will be established within each land parcel for storing materials, plant, and equipment. These compounds will be equipped with CCTV, lighting, alarm systems, and secure storage. Forensic marking, asset logs with serial numbers, and the use of third -party locking devices will also be employed. Site security staff and warning signage will be present, and keys will be stored securely and separately from equipment.</p>
--	--	---

18 Table 18-1 National Gas Transmission Representation

Consultee	Comments	Applicant's Response
NGT	<p>I write on behalf of National Gas Transmission plc (NGT) in relation to RWE Renewables Uk Solar and Storage Limited's (Applicant) application for the Tween Bridge Solar Farm Development Consent Order.</p> <p>Following an amendment to the Order limits by the Applicant, NGT confirms that its apparatus is no longer affected by the Tween Bridge Solar Farm scheme and as such it will not be participating in the Examination.</p>	The Applicant notes the comments.

19 Table 19-1 NATS Representation

Consultee	Comments	Applicant's Response
NATS LTD	<p>Dear Sirs, we write in relation to the correspondence received by surface mail, dated 11th November 2025 notifying us of the Acceptance of the DCO application.</p> <p>NATS operates no infrastructure within 10km of the site in question. Accordingly, it anticipates no impact from the proposal and has no comments to make on the Application. Please update the contact details you have for NATS as per the information below, and note our preference to receive consultation/requests electronically.</p>	The Applicant notes the comments.

20 Table 19-1 Exolum Pipeline Systems Ltd Representation

Consultee	Comments	Applicant's Response
Exolum Pipeline Systems Ltd	<p>Exolum has a responsibility to ensure the integrity and safety of its pipeline network. The application has the potential to contravene Exolum's ability to safely access and maintain its assets under their legal rights as set out in Part IV of The Energy Act 2013. Due to the potential for breach(s) of the Health & Safety at Work Act 1974 with specific concerns around Regulation 15 of the Pipeline Safety Regulations 1996 and the potential for any subsequent work close to the High-Pressure Pipeline to impact both the safety of the pipeline and those doing the work.</p>	The Applicant is in ongoing discussions with Exolum Pipeline Systems Ltd regarding protective provisions for the protection of its interests

21 Table 21-1 Relevant Representations from Residents

Resident	Representation	Applicant' Response
<p>Michael Brooke</p>	<p>Objection to the Tween Bridge Solar Project</p> <p>Michael Brooke, Stoupergate Farm, Sandtoft Road</p> <p>Dear Sir/Madam,</p> <p>I am writing to formally object to the proposed Tween Bridge Solar Project. I am a resident and landowner at Stoupergate Farm, with my home and agricultural holding located within approximately 0.5 km of the proposed development. My objection is based not only on national policy and technical evidence, but also on the direct and personal impacts this proposal would have on my property, my livelihood, and my day-to-day quality of life.</p> <p>1. Loss of High-Quality Agricultural Land That I Farm and Depend Upon</p> <p>The proposed development would remove approximately 2,500 hectares (6,500 acres) of highly productive agricultural land from meaningful food production for up to 40 years. The majority of this land is classified as Grade 2 Best and Most Versatile (BMV) land under the Agricultural Land Classification system.</p> <p>As someone who farms in this area, I know first-hand the productivity of this land. Typical yields include:</p> <ul style="list-style-type: none"> • ~4 tonnes per acre of wheat • ~2 tonnes per acre of oilseed rape • 30+ tonnes per acre of sugar beet • ~25 tonnes per acre of potatoes <p>This is not marginal land. It is some of the most fertile land in Yorkshire and North Lincolnshire. The developer's assertion that the land is predominantly Grade 3b or poorer does not reflect on-the-ground reality and is contradicted by Natural England mapping.</p>	<p>The Applicant has responded to each of the items raised in the representation separately, below. Further to discussion during the Open Floor Hearing & Issue Specific Hearing on 14 and 15 April 2006, the Applicant is liaising directly with Mr Brooke to signpost the application documents that are relevant to his representations, as set out in the Applicant's Written summary of oral submissions made at the OFH1 [Document Reference 8.4 Revision 1] and Written summary of oral submissions made at the ISH1 [Document Reference 8.5 Revision 1].</p> <p>An assessment of the potential effects on agricultural circumstances is set out in the ES Chapter 15: Agricultural Circumstances [APP-052] and the Agricultural Land Classification (ALC) report [APP-120] and plan [APP-173]</p> <p>The agricultural land within the Order Limits has been the subject of an ALC survey. The results are set out in Table 15-7 of Chapter 15. The ALC results identify:</p> <p style="padding-left: 40px;">813 ha of Best and Most Versatile agricultural land; 1,001 ha of moderate quality; 17 ha not surveyed but unaffected.</p> <p>Of the BMV land, the majority (585 ha) is subgrade 3a. 120 ha of the site is ALC Grade 2. The land quality identified by field survey is not, therefore, as high as was shown on the provisional ALC maps. These maps were produced between 1967 and 1974, and the ALC system has been changed twice since then. Those provisional maps are not suited for site specific use (see Natural England's Technical Advice Note 049, ES reference 15-1).</p> <p>The ALC system considers the long-term potential of the land, based on inherent characteristics. The type of use, or intensity of use, does not have an effect on land quality.</p> <p>There is no policy that requires agricultural land, including land of BMV quality, to be used for active farming use. There is no policy that requires food to be produced, or land to be used at any particular</p>

	<p>Replacing this level of food production with solar infrastructure and low-value sheep grazing represents a clear downgrading of land use, contrary to national policy which requires strong protection of BMV land.</p> <p>Direct Contradiction of National Policy</p> <p>Policy / Statement Exact Requirement / Position Tween Bridge Position Written Ministerial Statement (May 2023) "The best solar sites are not on best agricultural land" Majority Grade 2 Defra Land Use Framework (consultation 2025) "Food production must be given greater weight than in recent years" Permanent displacement of high-value crops NPS EN-3 (2024) ¶2.10.17–2.10.19 Large-scale solar should "avoid the best and most versatile agricultural land" Uses BMV land Clean Power 2030 Action Plan (July 2025) "At least 9–10 GW of the 50 GW solar target should come from rooftop/commercial sites to spare farmland" Ground-mounted on prime farmland</p> <p>This directly contradicts the government's own 2023–2025 policy shift that explicitly prioritises food security and rooftop/commercial solar over speculative ground-mounted schemes on farmland.</p> <p>Approving Tween Bridge would set a disastrous precedent that "agrivoltaics" can be used as a blanket justification to override BMV protection – a precedent the Secretary of State has repeatedly refused in recent decisions.</p> <p>This objection alone justifies refusal, or at the very least requires the applicant to delete all tracker panels, raise fixed panels to genuine agrivoltaics height (>2.5 m), and secure binding agricultural continuation covenants – measures the applicant has explicitly ruled out.</p>	<p>intensity. Large areas of arable land are used for non-food producing agri-environmental uses. The potential effects on a local, regional and national basis are assessed in ES Chapter 15 section 15.5.64 to 15.5.96.</p> <p>Policy in the Solar Roadmap (DESNZ, 2025) seeks to achieve considerable growth on rooftops as well as ground mounted solar.</p>
	<p>2. Flood Risk – A Direct Threat to My Home, Land, and Livelihood</p> <p>My property lies within a pumped, low-lying catchment that depends entirely on artificial drainage infrastructure to remain habitable and productive. Without pumping, this area would flood.</p> <p>The Environmental Statement admits the development would increase surface water runoff by 15–25% and remove 11–14 hectares of floodplain storage. That alone is concerning.</p>	<p>The Applicant notes that the representation reference to a 15–25% increase in surface water runoff and the loss of 11–14 hectares of floodplain storage is not factually correct The ES Appendix 10.1 Flood Risk Assessment Part 1 and Part 2 [Document Reference 6.3.10.1 Revision 2] states at paragraph 6.17 that how the impact of the proposed solar PV modules on surface water runoff rates and flow patterns is considered to be negligible. With the proposed</p>

	<p>However, the most serious issue is the proposal to decommission four existing pumping stations within the site:</p> <ul style="list-style-type: none"> • Elmhurst • High Levels North • Low Levels • Belton Grange / Sims Hill Crowle <p>These stations currently manage a significant proportion of drainage and subsidence control. Their removal would directly increase flood risk to my land and home, and to nearby communities including Moorends, Thorne, and Crowle.</p> <p>The proposed replacement — a single consolidated pumping facility with no redundancy — would leave the system more fragile, not safer. Independent modelling shows this would result in 25–40% higher peak flows downstream.</p> <p>As a resident who has already experienced flooding anxiety in this landscape, this is not an abstract concern. Flooding here destroys crops, damages soils for years, and threatens homes.</p> <p>Why the Proposed Mitigation is Inadequate</p> <p>a) Attenuation basins are far too small</p> <p>Independent review by chartered hydrologists (submission to PINS, October 2025) shows that the basins provide only 4–6 hours of storage in a major event. Real Humberhead Levels storms last 48–72 hours (e.g., Storm Babet 2023, Storm Henk 2024). Once full, excess water overtops directly into the IDB drain network.</p> <p>b) Discharge limited to “greenfield rates” is meaningless in FZ3</p> <p>The site is already at or below greenfield runoff rates because it is flat, heavy clay, and artificially pumped. The legal and policy test in NPPF ¶168 / footnote 55 is no increase in peak flow or volume downstream — not merely no increase above a notional greenfield rate. The applicant’s own modelling shows volume increases of several thousand cubic metres that must go somewhere.</p> <p>c) Loss of floodplain storage is permanent and unmitigated</p> <p>NPPF ¶168 requires sequential avoidance and compensatory storage on a level-for-level, volume-for-volume basis. The ES provides zero off-site compensatory storage despite losing 11–14 ha of active floodplain. The two attenuation basins are only temporary storage, not floodplain replacement.</p> <p>d) Climate-change allowances are out of date</p>	<p>mitigation measure and drainage strategy in place, the Scheme would be safe for its lifetime without increasing the risk of flooding elsewhere. The reference to the use of attenuation basins and a 30% climate change allowance within the Outline Surface Water Drainage Strategy (in ES Appendix 10.1 Flood Risk Assessment Part 2 [APP-109]) is also incorrect.</p> <p>There are also no proposals to remove four pumping stations and replace with one consolidation station as part of the Scheme. Paragraph 5.58 of Applicant’s Written Summary of Oral Submissions made at Issue Specific Hearing 1 (Document Reference 8.5) sets out the Applicant understanding that based on the Isle of Axholme Flood Risk Management Strategy, the Isle of Axholme and North Nottinghamshire Water Level Management Board (IDB) is in the process of rationalising, rather than simply removing, several pumping stations to ensure long-term, cost-effective flood protection.</p> <p>The Outline Surface Water Drainage (in ES Appendix 10.1 – Flood Risk Assessment Part 2 [Document Reference 6.3.10.1 Revision 2]) provides measures to ensure no increase in surface water runoff on site following the Scheme. All drainage measures have been designed in accordance with the relevant guidance. The rainfall climate change allowance used to design the Outline Surface Water Drainage Strategy is 40% and the most conservative figure based on latest climate change guidance.</p> <p>As detailed in the ES Appendix 10.1 –Flood Risk Assessment [Document Reference 6.3.10.1 Revision 2], the design of the Scheme ensures negligible impact on flood storage. The Environment Agency are content with this pending a review of any proposed access track raising.</p>
--	---	--

	<p>The FRA uses the 2016 climate-change allowances (+30% peak rainfall for 2070s). EA guidance updated February 2024 now requires +45% central and +65% upper-end for the Humber catchment. Re-running the applicant’s own model with correct allowances increases runoff by a further 35–40% – rendering the drainage strategy obsolete.</p>	
	<p>3. Cumulative Flood Risk from Other Developments</p> <p>Construction has already begun on the Unity One development at Hatfield, which will increase runoff into the same Internal Drainage Board system. When combined with the increased runoff from Tween Bridge and the removal of four pumping stations, the cumulative risk becomes unacceptable.</p> <p>The Internal Drainage Board has stated it cannot accept this additional water, and the Environment Agency has maintained its objection. As someone living within this system, I find it deeply concerning that this risk is being downplayed.</p>	<p>The Applicant notes the response. The Applicant understands the ‘Unity One development at Hatfield’ to be in reference to Land Between Hatfield, Stainforth, Dunscroft and Dunsville Doncaster (planning reference: 22/01345/REM M (being matters reserved in outline application previously granted permission under ref 15/01300/OUTA on 21.04.2017)). This scheme was considered in ES Appendix 17.1 Cumulative Sites Long List [APP-126]. The scheme is 3km to the west and was scoped out of the shortlist of cumulative schemes as there is no temporal overlap anticipated (construction has started) and therefore considered within the baseline. Additionally, in regard to flood risk the zone of influence is hydrological and hydrogeological receptors within a 2km radius from the Order Limits based on the hydrological and hydrogeological connectivity of water bodies located in the vicinity of the Scheme. Therefore, the Land Between Hatfield, Stainforth, Dunscroft and Dunsville Doncaster is not assessed cumulatively, and no interaction or adverse significant effects are anticipated from this development and the Scheme. All developments are required to manage water resources, flood risk and drainage to ensure they do not have a negative impact at the sites themselves or elsewhere. The Outline Surface Water Drainage (in ES Appendix 10.1: Flood Risk Assessment Part 2 [Document Reference 6.3.10.1 Revision 2]) provides measures to ensure no increase in surface water runoff on site following the Scheme. There are also no proposals to remove four pumping stations and replace with one consolidation station as part of the Scheme. Paragraph 5.58 of Applicant’s Written Summary of Oral Submissions made at Issue Specific Hearing 1 (Document Reference 8.5) sets out the Applicant understanding that based on the Isle of Axholme Flood Risk Management Strategy, the Isle of Axholme and North Nottinghamshire Water Level Management Board (IDB) is in the process of rationalising, rather than simply removing, several pumping stations to ensure long-term, cost-effective flood protection.</p>
	<p>4. Sheep Grazing Does Not Protect Food Security or Local Farming</p>	<p>The ES Chapter 15: Agricultural Circumstances [APP-052] sets out the potential effects in terms of local business effects, land use and food production, and economic implications.</p>

	<p>The suggestion that sheep grazing under panels mitigates the loss of farmland does not reflect agricultural reality. The UK already overproduces lamb, and additional grazing land will depress prices, harming local farmers.</p> <p>Replacing arable cropping with sheep grazing does not replace the food output this land currently provides, and it does nothing to protect food security.</p> <p>What the Applicant Promises vs. What the Evidence Actually Shows</p> <p>Applicant Claim (ES + Non-Technical Summary) Independent Evidence (2019–2025) Reality Gap Sheep grazing will be fully compatible and economically viable Lancaster University / Solar Energy UK trials (2023–2025) show 35–65 % reduction in pasture productivity under UK panels Severe Stocking rate 1–1.5 ewes/ha (≈1,500–2,000 sheep total) Real UK solar farms (e.g., Heckington, Sunnica monitoring) average 0.4–0.7 ewes/ha after Year 3 60–70 % lower Panels at 0.8–1.2 m height allow normal farm machinery Tracker panels move to 4.1 m at rear → minimum height at times is only 0.4 m → impossible for topping, fertilising, or haymaking Complete incompatibility “Agrivoltaics will maintain agricultural output” EU LIFE Agrivoltaics study (2024) + Rothamsted 2025: on heavy clay soils (like Thorne) shading reduces grass DM yield by 55–80 % Not possible No displacement of arable farming Site currently grows wheat, oilseed rape, potatoes, sugar beet → all permanently displaced 100 % displacement</p>	<p>The land under and around the panels could be used for grazing sheep, as described in Chapter 15. No claims are made that this will be at any particular density of grazing, or that the output (for example in terms of calories produced) will replicate the calories from current uses. The ES Chapter 15 analysis identifies current land use (in terms of cropping or stocking). It identifies theoretical benefits, in terms of production, from the BMV land within the site. It reviews policy on food production. There is no food production policy, nor any incentive for land to be used for food production, or at any particular intensity. Large areas of arable land are currently used for non-food-producing agri-environmental uses. There will be no significant effect on UK food production or security.</p>
	<p>5. Visual Impact on My Home and Broken Commitments</p> <p>My farmhouse and bungalow lie within 0.5 km of the site. Solar panels, fencing, substations, and lighting will permanently alter views from my home and garden. Local estate agents (Belton, Epworth, Crowle) report 10–20% price suppression within 2 km of existing/consented energy schemes.</p> <p>Glint and Glare</p> <p>ES Chapter 6 (Appendix 6.7) predicts significant glare towards the A18 and M180 at low sun angles (up to 300–400 minutes per year above aviation thresholds). While aviation impacts are mitigated via transponder agreements, road users and residents receive no meaningful mitigation. Independent studies (Pager Power 2024) show modern bifacial panels increase glare intensity by 50–80% compared with the older modules assumed in the ES.</p> <p>Inadequate Mitigation Planting</p> <ul style="list-style-type: none"> Proposed hedges are only 3–5 m high at maturity – far too low to screen 4.1 m tracker panels on flat ground. Photomontages (Viewpoints 4, 7, 10, 12) show panels still clearly visible above hedges even at Year 15. 	<p>The Applicant has noted the comment on residential prices however is not aware of any empirical evidence to suggest long term implications for property prices and does not intend to make further comments on this as property values are not a material planning consideration.</p> <p>The response reference ES Chapter 6: Landscape and Visual Assessment [Document Reference 6.2.6 Revision 2] and ES Technical Appendix 6.7: Stainforth & Keedby Canal – Thorne to Crowles Corridor Study [APP-071] under the subheading of Glint and Glare. These documents do not discuss Glint & Glare. Glint & Glare is assessments of the Scheme are provided for combined fixed tilt and tracker design in document [APP-122] and an all-fixed tilt design in document [Document Reference 6.3.16.2 Revision 2].</p> <p>Appendix 6.2 Residential Visual Amenity Assessment Criteria [APP-062] includes Stoupersgate Farm as part of Residential Visual Amenity Assessment Cluster ID 32. Whilst Significant effects are acknowledged at Year 1, with the proposed mitigation as set out ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2] reducing the effect upon the property at Yr 15 as Not</p>

<p>• Planting setbacks of only 5–15 m from field boundaries leave panels prominently visible from roads and footpaths.</p> <p>• No off-site planting is offered despite policy encouragement (North Lincolnshire Core Strategy CS17).</p> <p>Despite assurances from the developer’s land agents over a year ago, no site visit has taken place, and no Residential Visual Amenity Assessment (RVAA) has been provided. This is a serious omission given the proximity of the development and the scale of change to my living environment.</p> <p>6. Noise and Impact on My Home and Livestock</p> <p>Solar farms are not silent. Inverters, transformers, and battery storage operate continuously. Construction activities such as piling and heavy vehicle movements would generate significant noise.</p> <p>Noise Impacts – What the ES Says vs. Reality</p> <p>Source Applicant Predicted Level (LAeq) at nearest house Measured Real-World Equivalent (2024–2025 UK solar + BESS sites) Residual Significance in ES BESS cooling fans + inverters 34–38 dB(A) 44–52 dB(A) (Heckington Fen, Cleve Hill, Bramley) Minor adverse Transformer hum (50 Hz + harmonics) 30–33 dB(A) 38–46 dB(A) + strong tonal character Minor adverse Combined night-time level < 35 dB(A) 45–50 dB(A) with character penalties Not assessed</p> <p>Why the Applicant’s Modelling is Wrong</p> <ul style="list-style-type: none"> • Used outdated manufacturer data (pre-2024 container designs). • Assumed 3 m acoustic screens that are physically impossible around cooling intakes. • Ignored low-frequency content and tonality – known to cause high annoyance even at low dB(A) levels. • Independent acoustic reports submitted by residents (Nov 2025) using ISO 9613-2 with real container specifications predict 48–53 dB LAeq + 5–8 dB character correction → clear breach of WHO night-noise guidelines (40 dB Lnight outside). <p>The 400 MW BESS and substations are not benign additions – they are permanent, 24/7 industrial facilities introducing continuous mechanical and tonal noise that will be clearly audible (and highly annoying) inside nearby homes, and 18–20 m high buildings and solid blocks of containers that destroy the open, tranquil character of the Humberhead Levels.</p> <p>The applicant’s noise modelling is demonstrably optimistic, and the visual harm is accepted as long-term and significant in the ES itself. In an area that has no comparable existing development, this represents an unacceptable and irreversible industrialisation of the countryside.</p>	<p>Significant. The Applicant also undertook a further residential visit on 17th March 2026 to meet with the residents.</p> <p>The Scheme is offset by over 100m, with proposed tree lined hedgerows located to the east, west and north of the property, to reduce the visual effects in the longer term, as illustrated in ES Figure 6.4 Landscape and Visual Mitigation Strategy [Document Reference 6.4.6.4 Revision 2] and secured via Requirements 6 and 8 in the Draft DCO [Document Reference 3.1 Revision 3].</p> <p>There are no photomontages from Viewpoints 4, 7, 10 and 12. The photomontages within the ES are contained within Appendix 6.4: Photomontage Visualisations [APP-067] and include photomontages from 1, 3, 5, 15, 21, 23 and 26.</p> <p>The Applicant agrees that solar farms do create a degree of noise. The factors detailed in the respondents opening comment have all been considered within the calculations presented in ES Chapter 13: Noise and Vibration [APP-050]. The Applicant cannot however rationalise the numbers that have been referenced within the response. The Applicant welcomes a fuller explanation of their response so that it can be understood within the context of this Scheme. In this instance, the calculations include a +2dB weighting for a ‘just perceptible tone’. The predicted rating noise level (including the +2dB character correction) generally falls well below the background sound level, indicating there would be a significant level of masking from other environmental sound and it would not be strongly perceptible.</p> <p>The data used in the noise model is considered representative of noise generated by the various sources. There is no evidence to substantiate the claim that the noise data is obsolete. Furthermore, the general trend is for more modern equipment to generate less noise as technology progresses. To that end, the noise sources used in the calculations are considered conservative in nature.</p> <p>The Applicant has identified the Noise Sensitive Receptors [APP-165] which have informed the noise assessment of the Scheme. The assessment does not include a 3m fence.</p> <p>The noise calculations use octave band data for all operational plant within the model. This includes data for the 63Hz and 125Hz octave bands. In addition, a +2dB weighting is applied in the calculations for a ‘just perceptible tone’</p>
---	---

	<p>This is clear grounds for refusal, or at the very least requires relocation of the entire BESS to a brownfield grid connection point (e.g., Keadby or West Burton power-station sites) – an option the applicant has refused to consider.</p> <p>I keep sheep at my smallholding (Redacted), and veterinary evidence shows that prolonged or sudden noise can stress livestock, disrupt feeding, and in pregnant ewes increase the risk of miscarriage or reduced birth weights. No noise assessment has been undertaken for either my residence or my livestock holding.</p>	<p>The Applicant has not seen the report reference in the representation and therefore cannot provide any further comment on its content.</p> <p>The site design does not include 18 – 20m high buildings or solid blocks of container.</p> <p>The predicted impact on residential receptors is at the No Observed Adverse Effect Level which indicates: ‘Noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. Can slightly affect the acoustic character of the area but not such that there is a change in the quality of life.’ Therefore, this would not be considered “highly annoying”.</p> <p>The calculations presented assume all plant is operating at 100% capacity for the duration of the assessment period, includes a weighting correction for potential audible tones and is assessed against noise limits derived from robust measured background sound levels. As such, the assessments are considered to be conservative in nature, rather than optimistic as implied by the respondent’s comment.</p> <p>The assessment outcomes do not substantiate the respondent’s conclusion of grounds for refusal.</p> <p>As indicated above, the noise from the development would largely be masked by the existing noise climate in the area and would not expose any livestock to ‘sudden noise’. It is noted that the site is in reasonable proximity to the M180, a significant and existing source of noise.</p> <p>If the respondent’s property can be identified, additional calculations can be provided to ascertain the likely impact on his specific dwelling.</p> <p>The respondent can contact info@tweenbridgesolar.co.uk to discuss and provide further details.</p>
	<p>7. Road Safety and Damage to Local Infrastructure</p> <p>Local roads around Sandtoft Road and Crowtree Bank already suffer from subsidence and weight restrictions due to peat soils. Construction traffic for a development of this scale will inevitably exceed 7.5-tonne limits, risking damage to roads and drainage.</p>	<p>The suitability of local roads for access is set out in the submitted Outline Construction Traffic Management Plan [APP-182]. Some local roads have ‘except for access’ exemptions for vehicles over 7.5 tonnes. This does not therefore preclude access to the site for large construction vehicles. Crow Tree Bank is not subject to any signed weight restrictions.</p>

<p>The Sandtoft Road / Crowtree Bank junction is already an accident hotspot. Surrounding it with solar panels raises concerns about glint and glare, yet no assessment has been provided.</p> <p>The Applicant’s Own Traffic Figures (Transport Assessment, August 2025)</p> <p>Parameter Applicant Figure Realistic Peak (independent review) Total two-way HGV movements 1,216 over 18 months (≈ 5–6 per day average) 1,800–2,400 (clustered deliveries) Peak month 110–130 movements (≈ 10–12 per day) 250–350 (when cable trenching + concrete pours overlap) Primary route A18 west from M180 J2 → site entrances at Medge Hall, Swinefleet Road, and Woodcarr Lane Same route – no alternative offered Secondary route B1392 / minor roads through Crowle & Keadby Used for staff + abnormal loads Construction staff vehicles 150–200 cars/vans per day 280–320 at peak</p> <p>Why These Figures Are Grossly Understated</p> <ul style="list-style-type: none"> • The TA assumes perfectly even delivery spread – real solar-farm construction is highly peaked (e.g., 40% of concrete and steel arrives in two 6-week windows). • It ignores overlapping construction with West Burton Solar (same contractor, same 2027–2029 window) – independent model by Lincolnshire County Council (Nov 2025) predicts combined peak of 450–550 HGVs/day on the A18. • No allowance for mud-on-road events in winter (site is heavy clay, routinely waterlogged). <p>Cumulative Developments Within 25 km (as of November 2025)</p> <p>Scheme Type Capacity Status Distance from Tween Bridge Tween Bridge Wind Farm 24 turbines (up to 200 m) 115 MW Consented 2023 0–2 km (immediately west) Keadby 3 Carbon Capture Power Station Gas + CCS 910 MW Consented 2023 8 km Keadby Hydrogen Pathfinder 100 % hydrogen plant Up to 1.8 GW Scoping 2025 9 km West Burton Solar (3 projects) Solar + BESS 1,400 MW In examination 12–18 km Cottam Solar Solar + BESS 600 MW In examination 18 km Gate Burton Solar Solar 500 MW In examination 20 km Tillbridge Solar Solar 500 MW In examination 22 km North Lincolnshire Green Energy Park Energy-from-waste + BESS 95 MW + 600 MW Scoping 15 km</p> <p>Total additional capacity in the pipeline: >5,000 MW of new generation and storage – most of it on former farmland in the same flat, open Humberhead Levels landscape.</p> <p>How the Tween Bridge ES Deliberately Fragments and Underplays Cumulative Effects</p> <p>Impact Type What the ES does What it should have done (but didn’t) Landscape & visual Only assesses Tween Bridge Wind Farm as “operational/consented” Should have included West Burton, Cottam, Gate Burton, Tillbridge (all accepted into examination before 26 Aug 2025) → realistic worst-case = 4,000+ ha of panels visible simultaneously Traffic & air quality Construction traffic only added to Tween Bridge Wind Farm Four solar NSIPs have overlapping 2027–2030 construction windows → up to 4,000 extra HGV movements/day</p>	<p>The Applicant is committed to carrying out a highway condition survey, as set out in the Outline Construction Traffic Management Plan [APP-182] which is secured by requirement 16 of the Draft DCO [Document Reference 3.1 Revision 3]. The Outline CTMP for West Burton Solar Farm confirms that construction traffic to that site will route via the A15 not the A18 and therefore there is not forecast to be any overlap in construction vehicle movements.</p> <p>The Outline Construction Traffic Management Plan [APP-182] commits to providing wheel wash facilities at the exit of the construction compounds. Road sweeping can be included, if conditions dictate.</p> <p>While noise from plant can include some tonal elements, the distances between the various noise sources and receptor locations are fairly large, giving significant distance attenuation. Cumulative noise from the existing, operational Tween Bridge windfarm has been considered in baseline assessment, as presented within the ES Chapter 13:Noise and Vibration [APP-050]. The baseline noise survey represents the current noise climate across the Order Limits.</p> <p>The ES Chapter 17: Cumulative Impacts [APP-054] also considers the potential for cumulative effects arising as a result of the Scheme. Significant beneficial cumulative residual effects have been identified for socio economic matters, with all other cumulative residual effects for matters including landscape, ecology, transport, flooding, air quality, agriculture circumstances, considered to be not significant. The overall combined ‘search area’ for the long list of relevant other existing development and/or approved development(s) has been based on the largest Zone of Influence in terms of distance, which in this case is 10km.</p> <p>With regards to property values, the Applicant makes reference to the Planning Practice Guidance Determining a Planning Application, whereby under material considerations it states (Applicant emphasis in bold and underlined) <i>“A material planning consideration is one which is relevant to making the planning decision in question (eg whether to grant or refuse an application for planning permission). The scope of what can constitute a material consideration is very wide and so the courts often do not indicate what cannot be a material consideration. <u>However, in general they have taken the view that planning is concerned with land use in the public interest, so that the protection of purely private interests such as the impact of a development on the value</u></i></p>
---	---

	<p>on the same rural roads (A18, M180 J2) Noise Cumulative noise only from wind farm turbines Substations + BESS cooling fans from multiple schemes will create continuous low-frequency hum across 10 km radius Ecology Claims no cumulative impact on Thorne/Hatfield Moors SAC Combined hydrological drawdown + nitrogen deposition + barrier effect from 5,000+ ha of fencing/panels severs east-west wildlife corridors Socio-economic / rural character No cumulative assessment at all Transformation of the entire Isle of Axholme and western Doncaster into an energy park – loss of rural identity, tourism (Peatlands Way), property values</p> <p>The ES uses the arbitrary cut-off “schemes that had submitted their DCO application by 31 March 2025” – thereby excluding West Burton, Cottam, Gate Burton and Tillbridge, all of which were formally accepted into examination months before the Tween Bridge application itself. This is a deliberate methodological device to avoid assessing the realistic worst-case scenario.</p>	<p><i>of a neighbouring property or loss of private rights to light could not be material considerations.”</i></p>
	<p>8. Decommissioning and Reversibility</p> <p>The applicant’s 40-year “reversible” claim is technically unsupported, financially under-resourced, and risks leaving permanent industrial scarring and carbon liabilities on peat-rich soils.</p> <p>What the Applicant Promises (Outline Decommissioning Plan, August 2025)</p> <p>Promise Detail in the Application Full removal of all panels, inverters, cables By Year 40–41 (2065–2066) Removal of all foundations “To 1 m below ground” (i.e., 1–2 m concrete piles left in situ) Recycling rate 95–98 % of materials Site restoration “Returned to full agricultural use” Financial provision £5.1 million bond (escalating with RPI only)</p> <p>2. Why Every Single Promise Is Unrealistic or False Issue Current Evidence (2024–2025) Consequence for Tween Bridge Panel recycling rates Real UK/EU rates 2025: 82–88 % (PV Cycle, IRENA 2025). Fluoropolymer backsheets and encapsulants not recycled 120–180 tonnes/ha of toxic plastic waste left in landfill Foundation removal cost Independent costings (Arup 2025, WSP 2025): £18,000–£24,000/ha to remove 2–3 m driven piles on clay £5.1 m bond covers only 20–28 % of real cost (£23–30 m total) Cable removal 1,200–1,500 km of underground HV cables. No UK solar farm >10 MW has ever removed all cables Cables left in ground → permanent obstacle to cultivation Soil contamination & compaction 40 years of pile driving + tracker footings → deep compaction + potential transformer oil leaks Restoration to Grade 2 standard impossible without heroic (un. £40–50 k/ha) remediation Peat oxidation & carbon release Parts of site on degraded peat (Grade 3b/4 fringes). Lowering water table during construction + 40 years of drainage → 300–600 tCO₂e/ha released (Natural England 2025) Undermines entire net-zero justification Technology</p>	<p>As detailed within ES Chapter 2 Scheme Description [APP-039] and the Outline Decommissioning Environmental Management Plan [Document Reference 7.3 Revision 2] the Scheme will be decommissioned following the 40 year operational period. This will involve the removal of all solar infrastructure, including solar PV modules and on-site supporting equipment.</p> <p>The preparation of a Decommissioning Environmental Management Plan is secured through Requirement 19 of the Draft DCO [Document Reference 3.1 Revision 3] and will take place closer to the time of the decommissioning. Requirement 19(3) sets out that the DEMP must be substantially in accordance with the Outline DEMP [Document Reference 7.3 Revision 2].</p> <p>The Applicant does not recognise the £5.1m referenced in the representation. This figure is not stated within Outline DEMP [Document Reference 7.3 Revision 2] nor other documents which has been submitted as part of the application.</p> <p>The Applicant notes that the Secretary of State granted development consent in respect of Mallard Pass Solar Farm on 12 July 2024.</p> <p>The Applicant notes that the Secretary of State granted development consent for Little Crow Solar Park on 5 April 2022. The Little Crow Outline Decommissioning Plan¹, states how “Under the terms of the lease with landowners, INRG Solar (Little Crow) Ltd</p>

¹ [ENO10101-000776-DOC-REF-7-9C-LC-TA4-2-ODS-TRACKED-4297-9.pdf](#)

	<p>obsolescence 2065 panels will be Generation 8–10; no current facility can process 2020s–2030s modules Applicant’s 95 % recycling assumption is fantasy</p> <p>3. Financial Provision Is Laughably Inadequate Cost Item (2025 prices) Realistic Cost (per hectare) Total for 1,500 ha Applicant’s Bond Panel & steel removal + recycling £4,500–£6,000 £6.8–£9.0 m Included Full pile extraction (2–3 m) £12,000–£16,000 £18–£24 m Not funded Cable removal & disposal £2,500–£3,500 £3.8–£5.3 m Not funded Deep tillage & soil remediation £3,000–£5,000 £4.5–£7.5 m Not funded Contingency & inflation to 2065 (3 % p.a.) – +80–120 % RPI only (~2 %) Total realistic cost (2065 £) – £65–£95 million £5–£7 million</p> <p>The bond is therefore 10–15 times too small – a gap of £60–90 million that will fall on landowners or taxpayers.</p> <p>No Meaningful Enforcement Mechanism</p> <ul style="list-style-type: none"> • The £5.1 m bond is secured only via a voluntary S.106 with North Lincolnshire Council (not a DCO requirement). • No annual review or inflation-proofing beyond RPI. • No requirement for periodic top-ups based on updated decommissioning costs (unlike offshore wind). • No post-decommissioning monitoring of soil quality or drainage. <p>Policy Tests Failed</p> <p>Policy / Guidance Requirement Tween Bridge Position NPS EN-3 ¶2.10.55–2.10.59 (2024) Decommissioning must be secured by requirement or obligation; full removal and restoration expected Only partial removal; voluntary & under-funded NPPF ¶183 Avoid unacceptable risks from pollution and land instability Risk of 180,000 tonnes of unrecyclable waste Written Ministerial Statement (May 2023) Solar farms must be “genuinely reversible” Not reversible after 40 years on this soil type Environment Act 2021 + EIA Regs Long-term and cumulative effects must be assessed 2065 scenario dismissed in two pages</p> <p>Precedent – Recent Decisions That Demanded Proper Decommissioning Security</p> <ul style="list-style-type: none"> • Sunnica Solar (2025): Examining Authority forced applicant to increase bond from £8 m to £74 m and make it a DCO requirement. • Mallard Pass Solar (withdrawn 2025): Applicant withdrew after SoS indicated refusal unless full pile removal and £90 m bond secured. • Little Crow Solar (consented 2024): Only allowed because applicant agreed full removal to 1.5 m depth and index-linked £42 m bond. 	<p><i>is responsible for the for full reinstatement and repair of the site at the end of the lease, requiring it to be returned to its original condition or to conditions required for future intended land use. A sinking fund would start at year 10 of operations and this would set aside revenue for the decommissioning. The high value, high quality solar assets are an attractive long term investment for other investors such as utilities, banks and pension funds, and if another investor / subsidiary or successors assume ownership of Little Crow Solar Park, in full or in part, the subsidiary or successor also assumes responsibility in the decommissioning of the site, in full or in part.”</i></p>
	<p>Conclusion</p>	<p>This is noted. The Applicant has responded to the concluding points in detail individually above.</p>

	<p>This proposal would directly affect my home, my land, and my livelihood. It would increase flood risk, remove vital pumping infrastructure, destroy productive farmland, and permanently change the character of the area I live and work in.</p> <p>The objections raised by the Internal Drainage Board, Environment Agency, and Coal Authority confirm that these are not personal fears but evidence-based risks. For these reasons, I strongly urge that the Tween Bridge Solar Project be refused.</p>	<p>The Applicant is continuing to engage with statutory consultees regarding the Scheme and is preparing Statements of Common Ground (SoCG) with the IDBs [Document References 9.8 Revision 1 and 9.7 Revision 1] and Environment Agency [Document Reference 9.4 Revision 1]. Draft versions of the SoCGs have been submitted at Deadline 1.</p>
<p>Tracy Croft</p>	<p>I object to the current proposal to develop a large-scale solar farm between Thorne and Crowle / A18 surrounding land on a number of grounds: My objections fall into six categories: 1. Visual and environmental impact 2. Impact on wildlife 3. Impact on property values 4. Loss of agricultural land 5. Impact of construction phase 6. Lack of engagement with residents by the developers</p>	<p>This is noted and each theme is responded to separately below.</p>
	<p>1. Visual and environmental impact We moved to our house on Jaques Bank in 2004 to enjoy the open farmland and big skies. If the solar farm is permitted to go ahead, we will only see fences and solar panels from all our windows, our garden and as we walk or drive through our neighbourhood.</p> <p>This area of the Isle of Axholme has long been enjoyed by local residents as well as visitors to the region. Walkers, horse riders, cyclists, wildlife enthusiasts and those in need of access to a mindful space in the outdoors have historically benefitted from the wide views and open countryside. Jaques Bank (our lane) is part of 'The Isle of Axholme Greenway', a series of routes designed to improve access to more of the Isle landscape. Covering the surrounding fields in solar panels, high fences and CCTV units/batteries etc will destroy the landscape that The Greenway encourages people to enjoy. North Lincs council cite our area as being the "internationally important landscapes of Crowle, Thorne and Hatfield Moors" and the proposed solar farm development threatens to remove access to this special environment from the local community and to impoverish the 'Safe and Pleasurable' enjoyment of our locality.</p>	<p>The Applicant has undertaken a site visit to this property on 18th March 2026. The property formed part of ES Appendix 6.2 Residential Visual Amenity Assessment [APP-062], Reference Group 49).</p> <p>The effects upon the Isle of Axholme Greenway are set out within ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2]. Whilst it is acknowledged that mitigation planting has been placed along the route, visual effects of users of the Isle of Axholme Greenway, along with canal users would be Major/Moderate adverse and significant at year 15.</p> <p>However, the Scheme does not alter the potential for accessibility in any way, and in some cases provides additional access opportunities, albeit in context of the Scheme.</p>
	<p>2. Impact on wildlife In the years we have lived here, we have shared the environment with otters, hedgehogs, swans, migrating house martins and swallows as well as healthy populations of hares and deer. Owls hunt up and down the dyke behind our house, goldfinch nest at the bottom of the lane - numerous insects and bees provide pollination services and feed the bird populations. We are extremely concerned the proposed fencing-in of any solar development will disrupt the vibrant ecosystem that exists here - including removing safe passageways across farmland which keeps the wildlife safely off the local roads and lanes.</p>	<p>The Applicant can confirm that recent research by scientists from the RSPB and University of Cambridge (Copping et al2025) ² has shown that solar farms contain a greater bird abundance and species richness than arable farmland and that solar farms can benefit biodiversity in arable-dominated landscapes.</p> <p>The Applicant considers that the mitigation and enhancement measures proposed as detailed and secured in the Outline Landscape Ecological Management Plan [Document Reference</p>

² Copping, J. P., Waite, C. E., Balmford, A., Bradbury, R. B., Field, R. H., Morris, I., & Finch, T. (2025). Solar farm management influences breeding bird responses in an arable-dominated landscape. *Bird Study*, 72(3), 217–222. <https://doi.org/10.1080/00063657.2025.2450392>

		<p>7.6 Revision 2] submitted at Deadline 1, including the native habitat creation across the Order Limits, comprising large areas of neutral grassland in the place of intensively managed arable farmland, new native hedgerows and trees, and improved water quality and soil conditions as a consequence of a cessation in intensive farming practices will ensure opportunities for wildlife are enhanced.</p> <p>Within the Relevant Representation provided by the City of Doncaster Council (CDC) [RR-006], they state that <i>'It is considered that the cessation of agricultural inputs and physical disturbance from ploughing and harrowing will have a beneficial impact on water quality and this is accepted.'</i> The Applicant considers that this provides further supporting detail on this point.</p> <p>The Applicant confirms that there is a commitment, under Requirement 8 of the Draft DCO [Application Document 3.1 Revision 3], to deliver at least 10% Biodiversity Net Gain across the Order Limits, which will provide further ecological enhancements for wildlife.</p> <p>The Applicant has positioned mammal gaps to ensure connectivity through the Order Limits and to ensure potential foraging habitat for a wide range of wildlife is provided. In addition, the Applicant has designed the fencing to enable corridors and therefore connectivity throughout the Order Limits. The Applicant also considers that the cessation of intensive arable farming that will improve water quality and native habitat creation proposed, including hedgerows, neutral grassland and trees, will ensure foraging opportunities are enhanced across the Order Limits. The fencing details are secured by requirement 9 of the Draft DCO [Document Reference 3.1 Revision 3] and the Outline Landscape and Ecology Management Plan is secured by requirement 8 of the Draft DCO [Document Reference 3.1 Revision 3]</p>
	<p>3. Impact on property values We have seen studies that indicate that such a large-scale solar farm on our doorstep will dramatically affect the resale value of our house. The two fields directly opposite our house are part of the proposal and they are less than 20 ft away from our front gates</p>	<p>With regards to property values, the Applicant makes reference to the Planning Practice Guidance Determining a Planning Application, whereby under material considerations it states (Applicant emphasis in bold and underlined) <i>"A material planning consideration is one which is relevant to making the planning decision in question (eg whether to grant or refuse an application for planning permission). The scope of what can constitute a material consideration is very wide and so the courts often do not indicate what cannot be a material consideration. However, in general they have taken the view that planning is concerned with</i></p>

		<i>land use in the public interest, so that the protection of purely private interests such as the impact of a development on the value of a neighbouring property or loss of private rights to light could not be material considerations.”</i>
	4. Loss of agricultural land In a time of world uncertainty, with wars raging and a changed relationship with our closest neighbours in Europe, the UK should be focussing on developing a more robust local food security policy. The proposed solar farm would remove thousands of acres of prime Lincolnshire farmland – surely this development would be more appropriate on a brown field site or already industrialised land (mega-warehousing estates etc)?	The Applicant has undertaken an assessment of the potential effects on agricultural circumstances and this is set out in the ES Chapter 15: Agricultural Circumstances [APP-052] and the Agricultural Land Classification (ALC) report [APP-120] and plan [APP-173].
	5. Impact of construction phase Inevitably, the building of the proposed solar farm, would have a detrimental effect on our home life – increased noise, dust/dirt, danger to our animals from additional traffic on the lane etc. Indeed, the lane itself is not suitable for large-scale traffic – it is too narrow and already breaking up from the usual, sporadic farm machinery that we occasionally see.	The Applicant notes that the construction impact of the Scheme has been assessed within the Environmental Statement aspect chapters [APP-043 to APP-054]. and summarised at ES Chapter 18: Summary [APP-055] . The Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2] and Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] detail management and mitigation measures to minimise the environmental impact from the Scheme’s construction phase.
	6. Lack of engagement with residents by the developers RWE have not engaged with us on the massive impact of this proposed development to our home life. Although we were promised a site impact assessment (SIA) during an online consultation meeting last year, RWE have not arranged it as promised. We have repeatedly requested this meeting (SIA), with no response to our emails, and feel that the developers do not care about the impact to residents. As this is not a local developer and with a lack of attention to the concerns of locals, we are left with the impression that RWE are interested only in potential profits and not what is good for this locality and region. As per the above, the proposed changes to our environment are problematic at a number of levels and should not go ahead.	The Applicant’s approach to community consultation is presented within the Consultation Report [APP-022] , which evidences that the Applicant has taken a proactive and inclusive approach to consultation during the pre-application stage of the Scheme.
Kevin Price	I am writing to register as an Interested Party and to support the Tween Bridge Solar Farm proposal. I live nearby, so I know the area well. Living here, you can’t ignore how the Humberhead Levels are changing. After heavy rain, the stretch between Moorends and the Moor Road drainage channel often sits under water, and flooding has become something we all just “deal with.” That’s one of the main reasons I support this project. We need serious, long-term measures that cut emissions and stabilize	The Applicant welcomes the support for the Scheme.

	<p>our energy system, or this region will face even worse pressures in the years ahead.I already see the Tween Bridge Wind Farm from my garden, and it’s never bothered me.</p> <p>What affects my day-to-day life far more is the rising cost of energy and the unpredictability of the grid. A project that can generate up to 800 MW of clean power, backed by battery storage, feels like a practical benefit for households across Doncaster and the Isle of Axholme. I know some people are worried about farmland, but much of this land is used flexibly anyway. The fact that sheep grazing can continue, and that the plans include new hedgerows and wetland habitats, makes this feel more like a managed landscape improvement than a loss.</p> <p>On evening walks near the Levels I often see lapwings and barn owls; if the project genuinely strengthens habitats, that is something I welcome. For all these reasons, I support the Tween Bridge Solar Farm.</p>	
<p>Colin Spence</p>	<p>I am writing to register as an Interested Party and to support the Tween Bridge Solar Farm proposal. I live in Scunthorpe and regularly use the roads and footpaths around the Isle of Axholme, so I know the area well.</p> <p>Living here, you can’t ignore how the Humberhead Levels are changing. After heavy rain, the stretch between Moorends and the Moor Road drainage channel often sits under water, and flooding has become something we all just “deal with.” That’s one of the main reasons I support this project. We need serious, long-term measures that cut emissions and stabilize our energy system, or this region will face even worse pressures in the years ahead.What affects my day-to-day life far more is the rising cost of energy and the unpredictability of the grid.</p> <p>A project that can generate up to 800 MW of clean power, backed by battery storage, feels like a practical benefit for households across Doncaster and the Isle of Axholme.</p> <p>I know some people are worried about farmland, but much of this land is used flexibly anyway. The fact that sheep grazing can continue, and that the plans include new hedgerows and wetland habitats, makes this feel more like a managed landscape improvement than a loss. On evening walks near the Levels I often see lapwings and barn owls; if the project genuinely strengthens habitats, that is something I welcome. For all these reasons, I support the Tween Bridge Solar Farm.</p>	<p>The Applicant welcomes the support for the scheme.</p>
<p>Carol Stevens</p>	<p>"This comment will be submitted when we register you as an interested party for this project.I am writing to register as an Interested Party and to support the Tween Bridge Solar Farm proposal.</p> <p>Living here, you can’t ignore how the Humberhead Levels are changing. After heavy rain, the stretch between Moorends and the Moor Road drainage channel often sits under water, and</p>	<p>The Applicant welcomes the support for the scheme.</p>

	<p>flooding has become something we all just “deal with.” That’s one of the main reasons I support this project. We need serious, long-term measures that cut emissions and stabilize our energy system, or this region will face even worse pressures in the years ahead. I already see the Tween Bridge Wind Farm from my garden, and it’s never bothered me. What affects my day-to-day life far more is the rising cost of energy and the unpredictability of the grid. A project that can generate up to 800 MW of clean power, backed by battery storage, feels like a practical benefit for households across Doncaster and the Isle of Axholme.</p> <p>I know some people are worried about farmland, but much of this land is used flexibly anyway. The fact that sheep grazing can continue, and that the plans include new hedgerows and wetland habitats, makes this feel more like a managed landscape improvement than a loss. On evening walks near the Levels I often see lapwings and barn owls; if the project genuinely strengthens habitats, that is something I welcome.</p> <p>For all these reasons, I support the Tween Bridge Solar Farm.</p>	
<p>George Sharman</p>	<p>I am writing to register as an Interested Party and to support the Tween Bridge Solar Farm proposal. I live in the local area and regularly use the roads and footpaths around here, so I know the area well. Living here, you can’t ignore how the Humberhead Levels are changing. After heavy rain, the stretch between Moorends and the Moor Road drainage channel often sits under water, and flooding has become something we all just “deal with.” That’s one of the main reasons I support this project. We need serious, long-term measures that cut emissions and stabilize our energy system, or this region will face even worse pressures in the years ahead. I already see the Tween Bridge Wind Farm from my garden, and it’s never bothered me. What affects my day-to-day life far more is the rising cost of energy and the unpredictability of the grid.</p> <p>A project that can generate up to 800 MW of clean power, backed by battery storage, feels like a practical benefit for households across Doncaster and the Isle of Axholme. I know some people are worried about farmland, but much of this land is used flexibly anyway. The fact that sheep grazing can continue, and that the plans include new hedgerows and wetland habitats, makes this feel more like a managed landscape improvement than a loss. On evening walks near the Levels I often see lapwings and barn owls; if the project genuinely strengthens habitats, that is something I welcome. For all these reasons, I support the Tween Bridge Solar Farm.</p>	<p>The Applicant welcomes the support for the scheme.</p>
<p>Kam Phanit</p>	<p>On Your first page statement “Adjusted site boundaries (order limits) Some land parcels near homes & farms have been removed to reduce visual impact on residents after further assessment “ Why have we been missed or overlooked?</p>	<p>The Consultation Report [APP-022, APP-023, APP-024, APP-025, APP-026 and APP-027] has explained all of the feedback received prior to the submission of the application and includes details of how consultees’ comments have been considered.</p> <p>The respondent can contact info@tweenbridgesolar.co.uk to provide further details of their property location.</p>

	<p>Despite my concerns ref use of concrete rafts to mount solar arrays in close proximity to my property, on historically saturated land with large bodies of standing water during January February & March (easily verified using historic satellite photographs)</p> <p>I hereby give notice that I formally request it to go on public record that in the event of flood damage to my property I will hold RWE & or any successors fully responsible</p> <p>On Land to the west of Anchor Drain adjoining my property I am left with nothing but a direct view from my patio doors, lounge & bathroom of solar panels within approx 40meters or less, I am lead to believe that 200 metres is the industry accepted best practice & they would require a landscaped screen Also it is not abundantly clear from your plans if the regulatory 6 or 10 meter path has been left in order to facilitate maintenance of the anchor drain</p>	<p>The Applicant has assessed the Scheme’s potential impact on flooding within ES Chapter 10: Water Resource [APP—048] and ES Appendix 10.1: Food Risk Assessment (Document Reference 6.3.10.1, Revision 2), and any appropriate mitigation is included within the proposals. The FRA concludes that the Scheme will be safe from all forms of flooding and will provide a betterment in terms of downstream flood risk and pollution. The surface drainage requirements are secured through requirement 11 of the Draft DCO [Document Reference 3.1 Revision 3]</p>
	<p>I am also astounded that despite my participation in your on line feedback that no one has attempted to make contact to discuss my comments, to press I have had no meaningful interaction with RWE.</p>	<p>The respondent can contact info@tweenbridgesolar.co.uk to provide contact details to allow discussions to take place.</p>
<p>Jonathan Carr</p>	<p>On Your first page statement “Adjusted site boundaries (order limits) Some land parcels near homes & farms have been removed to reduce visual impact on residents after further assessment” Why have we been missed or overlooked?</p> <p>Despite my concerns ref use of concrete rafts to mount solar arrays in close proximity to my property, on historically saturated land with large bodies of standing water during January February & March (easily verified using historic satellite photographs)</p> <p>I hereby give notice that I formally request it to go on public record that in the event of flood damage to my property I will hold RWE & or any successors fully responsible</p> <p>On Land to the west of Anchor Drain adjoining my property I am left with nothing but a direct view from my patio doors, lounge & bathroom of solar panels within approx 40meters or less, I am lead to believe that 200 metres is the industry accepted best practice & they would require a landscaped screen. Also it is not abundantly clear from your plans if the regulatory 6 or 10 meter path has been left in order to facilitate maintenance of the anchor drain.</p> <p>I am also astounded that despite my participation in your on line feedback that no one has attempted to make contact to discuss my comments, to press I have had no meaningful interaction with RWE .</p>	<p>The Applicant is not clear as to the location where Mr Carr resides and therefore the response is limited to information available.</p> <p>The respondent can contact info@tweenbridgesolar.co.uk to provide further details.</p> <p>The Applicant has however completed a Landscape and Visual Assessment of the proposals including Residential Visual Amenity Assessment [APP-062] to consider the impacts of local residents directly impacted by the Scheme. There is no set offset from properties and so each have been assessed individually in the context of the topography, existing vegetation, landscape features and proposed planting.</p> <p>The Applicant has assessed the Scheme’s potential impact on flooding within ES Chapter 10: Water Resource [APP—048] and ES Appendix 10.1: Food Risk Assessment [Document Reference 6.3.10.1, Revision 2], and any appropriate mitigation is included within the proposals. The Scheme has allowed for a 9m maintenance easement either side of Anchor Drain and this is detailed within the ES Appendix 10.1: Food Risk Assessment [Document Reference 6.3.10.1, Revision 2] whereby all IDB watercourses and main rivers</p>

		<p>will have a 9m buffer which is left clear of all development.</p> <p>The Consultation Report [APP-022, APP-023, APP-024, APP-025, APP-026 and APP-027] has explained all of the feedback received prior to the submission of the application and includes how consultees comments have been considered.</p>
Sharon Roslyn	<p>We have numerous concerns and worries, which include but are not limited to: The Impact on the Horses has not been taken into consideration, to include change of environment, flight risk, risk of injury or colic due to a change in surroundings. Safety of residents, our safety would be compromised when managing the horses, especially during the construction. Visual impact, Our house and horse arena are raised and the impact visually would be catastrophic.</p>	<p>The Applicant has contacted the Interested Party and met at the Interested Party's property to discuss potential opportunities to minimise the impacts during the construction period on their property. The Applicant will continue to engage with the Interested Party during and beyond the Examination.</p>
Richard Ketteringham	<p>I think this is a Exellent idea it provides both power generation security and financial security to the farmers that own the land it would sit on. The environmental benefit to small birds and insects will be massive.</p>	<p>The Applicant welcomes the support for the scheme.</p>
Richard Arnold	<p>I strongly object to the application on the grounds of landscape impact, loss of agricultural land, ecological harm, traffic and construction disturbance, flood risk, noise, glint and glare, and the cumulative burden of energy infrastructure already affecting this area. This is an industrial scale project and is inappropriate to the location due to the environmental sensitivity to the site. This project would cover up to 4000 acres, and it would convert open rural land into a massive industrial site. I object particularly all fields which are surrounding my house as the open flat nature of the land makes this development highly visible and intrusive, it will destroy natural views, and this area is highly residential.</p>	<p>The Applicant has undertaken a visit to this property on 17th March 2026. The property formed part of ES Appendix 6.2 Residential Visual Amenity Assessment [APP-062], Reference Group 38.</p>
Howard Michael Grady	<p>I am submitting this Relevant Representation as an individual resident and the owner of the property known as (Redacted)</p> <p>Our property is directly affected by the proposed Tween Bridge Solar Farm (EN010148). I strongly object to the application on many grounds such as: landscape impact, loss of agricultural land, ecological harm, traffic and construction disturbance, flood risk, noise, hum, glint and glare; the cumulative burden of energy infrastructure already affecting this area in general; our health and wellbeing in particular, as well as the fact that there are going to be a lot of children on the property when it becomes a day care centre in the near future.</p>	<p>The Applicant has undertaken a visit to this property on 18 March 2026. For reference the property formed part of ES Appendix 6.2 Residential Visual Amenity Assessment [APP-062], Reference Group 29 in which an assessment of effects on residential visual amenity was made.</p> <p>The submission is supported by and Outline Construction Traffic Management Plan [APP-182] which considers the impacts of the Scheme during the construction phase and sets out management and mitigation measures that will be implemented to minimise disruption.</p>
	<p>The experience of the consultation process from our perspective, the recipient, has appeared to be artfully constructed and very misleading at every point, including the most recent maps and pamphlets, being very hard to discern the coding and detail in the maps in order to be absolutely clear as to what is included and what is not, thereby creating an</p>	<p>The Applicant considers the consultation carried out to be robust. The process of engagement with both regulators and statutory bodies, alongside those likely to have an interest in the application is set out within the Consultation Report [APP-022]. The Design</p>

	<p>unfair disadvantage to us at the outset. Other examples of this are the misleading signage and placing of the signs, and the inconvenient timings of the public consultation sessions as noted when we attended the one at Crowle</p>	<p>Approach Document [APP-032] and ES Chapter 3: Site Selection, Site Description and Iterative Design Process [APP-040] discuss the design process and the decisions that were made, including the Scheme design principles identified to frame the design decisions, in order to minimise landscape and visual impacts and consider the LVIA analysis at ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2]. The layout design at submission has been influenced by consultation feedback throughout both stages of consultation.</p>
	<p>The loss of productive farmland is also of serious concern, particularly given increasing pressure on food security and the cumulative conversion of viable farmland to energy infrastructure in the region.</p>	<p>Matters pertaining to agricultural circumstances are assessed within ES Chapter 15: Agricultural Circumstances [APP-052]. The ES concludes how there are 20 farm businesses with land within Parcels A to E of the Scheme. The land is all used for arable cropping and the impacts on all farm businesses are minor adverse or negligible, which is not significant. There are no significant adverse effects on food production or security, or the wider land-based rural economy.</p>
	<p>The proposed development would significantly alter the character of the local landscape, replacing open agricultural land with an extensive and imposing industrial-scale solar array. As a resident living very [too] near the site, the visual intrusion would be substantial and permanent.</p>	<p>ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2] assesses the Scheme’s potential Landscape & Visual impacts, and is supported by several studies to inform the assessment [APP-061 through to APP-069]. The ES chapter acknowledges that, in common with almost all commercial energy development proposals, some landscape and visual effects would inevitably occur as a result of the Scheme. Some significant adverse effects are identified (to ground cover and the landscape character of the site and immediate surroundings during construction and at operation to the landscape character of the site and immediate surroundings, some residential receptors, some users of the public rights of way network and canal corridor and some users of the transport network), but these are highly localised and limited in nature, with many of the effects reduced by Year 15 following implementation of the landscape mitigation planting. Indeed, this planting would result in significant beneficial effects in terms of the hedgerow network within the Scheme.</p>
	<p>My home and property would be directly impacted by this proposal as it includes the introduction of the solar panels etc., on a field which is less than 100m from the edge of our property: posing risks to safety and our health [REF: see your RWE Tween Bridge Solar Farm; Plans & Drawings March 2025 ed; Areas D1 & D5].</p>	<p>The Applicant has extensive experience in building and operating solar farms which has informed the preparation and submission of the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2]. The purpose of this document is to provide a clear and consistent approach to the control of construction activities undertaken within the Order Limits.</p>

	<p>In particular, the potential hum, glare, vibration and noise will impact on our ability to sleep and remain well, given that my (Redacted) this is a major problem. Indeed, we have continued to live in this relatively peaceful and isolated area in the first place for health reasons. The disturbance that will inevitably be caused by the potential ongoing activity associated with the vast building and construction processes and associated nuisance, is, in its own right: problematic.</p>	<p>This document sits alongside the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2]</p>
	<p>The structural condition of our property is already being undermined by the heavy and unabated flow of lorries using the road [Crow Tree Bank], which itself is highly unsuitable for the hitherto unimagined volume, size, or frequency of traffic commercial traffic conditions already using it, even before the volume of construction vehicles anticipated with this proposal begins. The applicant has not adequately assessed or mitigated these impacts. The associated activity, noise, dust, traffic and general disturbance, during both construction and operation, would materially affect residential amenity and our specific health.</p>	<p>Crow Tree Bank is not subject to any signed weight restrictions and is already used by large vehicles on a regular basis. It is a single carriageway road with two marked lanes. Crow Tree Bank will be used to access parts of Land Parcel D only with vehicles arriving / departing from the A18 High Levels Bank in the north. The Applicant is committed to providing management and mitigation measures which are set out in the Outline Construction Traffic Management Plan [APP-182] and secured by requirement 16. The management and mitigation measures include a highway condition survey of construction traffic routes.</p>
	<p>Further, we have a tenant for part of our property who has an application in at Doncaster City Council for a day Centre. We have already been visited by representative of the council who have expressed their support for this as there is currently such a shortage of nursery places for young children. Part of the decision to be here is the 'farm-like' and countryside location and environment being suitable for the safety, education and well-being of children. Among them are some (Redacted) They also hope to make a small outside playground in the field next to our buildings [also owned by us], and so obviously to have solar panels in the field next to that part is also highly unsuitable, for all the same reasons. Again, one of the proposed fields in less than 100m from the edge of our property and this will be wholly incompatible</p>	<p>The Applicant has reviewed the City of Doncaster online planning register and is not aware of any live application for a day centre at this location. The Applicant will systematically monitor the planning register for consideration of potential new developments which should be considered for cumulative assessment. The respondent can contact info@tweenbridgesolar.co.uk to discuss and provide further details.</p>
	<p>Moreover, the site is sensitive in terms of drainage and flood risk. Large-scale hard infrastructure, soil compaction, and altered water flows risk exacerbating flooding locally. The applicant's drainage proposals and modelling appear insufficiently detailed and do not provide confidence that risks to surrounding properties and land have been appropriately addressed. There are also unresolved concerns about ecological impacts, including habitat disruption, displacement of wildlife and long-term damage to soil and its fertility.</p>	<p>The ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2] includes the latest flood model data from the Environment Agency. Flood risk mitigation measures are designed against the 1 in 1,000 year 2023 Tidal Trent flood levels plus 100mm of freeboard. The Environment Agency have confirmed they are content with the proposed flood risk mitigation measures on Site.</p> <p>At this stage, an Outline Surface Water Drainage Strategy included within the ES Appendix 10.1 Flood Risk Assessment [Document Reference 6.3.10.1 Revision 2] has been prepared, demonstrating surface water runoff rates and associated flood risk will be managed, with no increase in surface water flood risk on site or</p>

		<p>elsewhere. This is secured by requirement 11 of the Draft DCO [Document Reference 3.1 Revision 3].</p> <p>The design of the Scheme and Outline Surface Water Drainage Strategy ensures a negligible impact on water flows on site. As detailed within the ES Appendix 10.1 Flood Risk Assessment [Document Reference 6.3.10.1 Revision 2], all solar PV panels and infrastructure on site will be raised about the 1 in 1,000 year flood level plus 100mm of freeboard. This raising will ensure water can flow freely below.</p>
	<p>Finally, this development cannot be considered in isolation. The area is already host to multiple major energy projects, and the cumulative visual, environmental, and community effects are significant. The addition of another large-scale scheme would further intensify these pressures. For these reasons, I strongly object to the Tween Bridge Solar Farm proposal and request that the Examining Authority give full weight to the substantial impacts on residents, landowners, and the local environment.</p> <p>Mr Howard Michael Grady, (Redacted)</p>	<p>The ES Chapter 17: Cumulative Impacts [APP-054] considers the potential for cumulative effects arising as a result of the Scheme. Significant beneficial cumulative residual effects have been identified for socio economic matters, with all other cumulative residual effects for matters including landscape, ecology, transport, flooding, air quality, agriculture circumstances, considered to be not significant.</p>
<p>Simeon Jackson</p>	<p>Tween Bridge Solar Farm (NSIP EN01048)</p> <p>Relevant Representation / Formal Objection</p> <p>I object to the proposed Tween Bridge Solar Farm for the reasons set out below. The development would cause significant and unacceptable harm to the landscape, the community, wildlife, heritage, residential amenity, and the Isle of Axholme’s unique environment.</p>	<p>The Applicant has responded to each of the matters raised separately below.</p>
	<p>1. Major Landscape Harm and Industrialisation of Open Countryside</p> <p>The Isle of Axholme is defined by its open, expansive countryside with long, uninterrupted views. These qualities are central to the rural character and identity of the area.</p> <p>The proposed solar farm would replace this landscape with an enormous industrial installation including:</p> <ul style="list-style-type: none"> thousands of reflective panels security fencing inverter stations substations 	<p>The Applicant has fully assessed all landscape and visual receptors within ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2] and has specifically identified the following:</p> <p><i>‘Some significant adverse effects are identified (to ground cover and the landscape character of the site and immediate surroundings during construction and at operation to the landscape character of the site and immediate surroundings, some residential receptors, some users of the public rights of way network and canal corridor and some users of the transport network), but these are highly localised and limited in nature, with many of the effects reduced by Year 15 following implementation of the landscape mitigation planting. Indeed, this planting would result in significant beneficial effects in terms of the hedgerow network within the Scheme.</i></p>

<p>internal tracks and roads</p> <p>lighting and CCTV</p> <p>The scale of the development is incompatible with the sensitive, low-lying fenland landscape. The area would be permanently industrialised, with severe loss of rural character and visual amenity.</p>		<p>The landscape mitigation planting would be secured through Requirement 8 of the Draft DCO [Document Reference 3.1 Revision 3] which ensures that the Landscape and Ecology Management Plan is substantially in accordance with the Outline Landscape and Ecological Management Plan [Document Reference 7.5 Revision 2]. After a fully operational lifespan of 40 years, the scheme would be decommissioned and this would be secured via Schedule 2 of the Draft DCO.</p>
<p>2. Personal and Residential Amenity Impacts</p> <p>I moved to this area specifically for its unspoilt countryside, natural tranquillity, and rural views. These qualities are exactly why residents choose to live here.</p> <p>Replacing open fields with a massive industrial solar installation would fundamentally destroy the rural character, natural beauty, and quality of life we value.</p> <p>This development will negatively affect residents in multiple ways:</p> <p>Loss of visual amenity – the landscape will change from lush green fields to a uniform grey expanse of solar panels, detracting from everyday enjoyment of the area.</p> <p>Impact on residential desirability and property values – the area will become less attractive to live in, potentially reducing house prices.</p> <p>Daily experience of local roads – every journey along local roads will pass these large, industrial panels, creating an ongoing visual intrusion and sense of loss.</p>		<p>The Applicant notes these comments. ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2] assessed the Scheme’s potential Landscape and Visual Impacts. This has included a Residential Visual Amenity Assessment [APP-062].</p> <p>The respondent can contact info@tweenbridgesolar.co.uk to request further details.</p>
<p>3. Severe Cumulative Impact With Existing Infrastructure</p> <p>The area already hosts:</p> <p>Tween Bridge Wind Farm</p> <p>overhead electricity pylons</p> <p>substations</p> <p>other energy-related developments</p> <p>Adding another large-scale energy project would create an over-concentration of industrial infrastructure, significantly harming rural character and community well-being. The applicant has not sufficiently addressed cumulative impacts.</p>		<p>ES Chapter 17: Cumulative Impacts [APP-054] considers the potential for cumulative effects arising as a result of the Scheme. Significant beneficial cumulative residual effects have been identified for socio economic matters, with all other cumulative residual effects for matters including landscape, ecology, transport, flooding, air quality, agriculture circumstances, considered to be not significant</p>
<p>4. Loss of High-Quality Agricultural Land</p> <p>The site is highly productive farmland. Using it for a solar farm removes valuable food-producing land from use for decades.</p>		<p>The Applicant has assessed the Scheme’s likely effects on agricultural circumstance within Chapter 15 of the Environmental Statement [APP-052].</p>

	<p>This contradicts national policy protecting the best and most versatile agricultural land. Solar energy should be directed to:</p> <ul style="list-style-type: none"> rooftops of homes, farms, and commercial buildings brownfield or degraded land motorway or transport-adjacent land former industrial or mine sites —not high-quality agricultural land. 	<p>The Applicant has submitted a Policy Compliance Document [APP-031], which forms part of the Planning Statement [APP-030], as part of the application. This document provides a detailed schedule of all relevant national policies and demonstrates how the Scheme responds to and complies with that policy.</p>
	<p>5. Wildlife and Ecological Impacts</p> <p>The area supports diverse and long-established wildlife, including:</p> <ul style="list-style-type: none"> deer badgers foxes ground-nesting birds <p>The project would:</p> <ul style="list-style-type: none"> fragment habitats and wildlife corridors disturb and displace species disrupt nocturnal activity with lighting and human presence increase construction-related stress on local ecosystems <p>The applicant cannot guarantee that these impacts will be avoided or fully mitigated.</p>	<p>The Applicant can confirm that recent research by scientists from the RSPB and University of Cambridge (Copping et al 2025)³ has shown that solar farms contain a greater bird abundance and species richness than arable farmland and that solar farms can benefit biodiversity in arable-dominated landscapes.</p> <p>The Applicant considers that the mitigation and enhancement measures proposed, including the native habitat creation across the Order Limits, comprising large areas of neutral grassland in the place of intensively managed arable farmland, new native hedgerows and trees, and improved water quality and soil conditions as a consequence of a cessation in intensive farming practices will ensure opportunities for wildlife are enhanced. These are secured via requirement 8 of the Draft DCO [Document Reference 3.1 Revision 3]</p> <p>Within the Relevant Representation provided by the City of Doncaster Council (CDC) [RR-006], they state that <i>'It is considered that the cessation of agricultural inputs and physical disturbance from ploughing and harrowing will have a beneficial impact on water quality and this is accepted.'</i> The Applicant considers that this provides further supporting detail on this point.</p> <p>The Applicant confirms that there is a commitment to delivering at least 10% Biodiversity Net Gain across the Order Limits, pursuant to requirement 8 of the Draft Development Consent Order [Application Document 3.1 Revision 3] which will provide further ecological enhancements for wildlife.</p>

³ Copping, J. P., Waite, C. E., Balmford, A., Bradbury, R. B., Field, R. H., Morris, I., & Finch, T. (2025). Solar farm management influences breeding bird responses in an arable-dominated landscape. *Bird Study*, 72(3), 217–222. <https://doi.org/10.1080/00063657.2025.2450392>

		<p>The Applicant has positioned mammal gaps to ensure connectivity through the Order Limits and to ensure potential foraging habitat for a wide range of wildlife is provided. In addition, the Applicant has designed the fencing to enable corridors and therefore connectivity throughout the Order Limits. The Applicant also considers that the cessation of intensive arable farming that will improve water quality and native habitat creation proposed, including hedgerows, neutral grassland and trees, will ensure foraging opportunities are enhanced across the Order Limits.</p> <p>The Applicant confirms that detailed measures are included within an Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] to mitigate potential impacts during construction, including from lighting and potential human disturbance.</p>
	<p>6.Flood Risk and Drainage Concerns</p> <p>The Isle of Axholme is a highly engineered drainage system dependent on:</p> <ul style="list-style-type: none"> pumping stations maintained ditches carefully managed water levels <p>Construction and soil compaction could interfere with drainage, increase flood risk, and harm surrounding farmland and properties. Existing flood risk assessments do not adequately address the complexity of the area’s drainage system.</p>	<p>ES Chapter 10: Water Resources [APP-047] details how silt management and control measures are to be included within a Construction Environmental Management Plan secured by requirement 14 of the Draft DCO [Document Reference 3.1 Revision 3]. An Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2] has been prepared, an updated version of which has been submitted at Deadline 1.</p> <p>The Applicant disagrees with the statement that the ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2] does not adequately address the complexity of the area’s drainage system.</p>
	<p>7. Transport, Traffic, and Construction Impacts</p> <p>Rural roads are narrow and fragile, unsuitable for sustained HGV traffic. Construction will cause:</p> <ul style="list-style-type: none"> safety hazards damage to road surfaces and verges conflicts with agricultural vehicles 	<p>The Applicant notes that the suitability of local roads for access is assessed within the application documents, namely ES Chapter 12 Transport and Access [APP-049] and the ES Appendix 12.1 Transport Statement [APP-111]. Some local roads have ‘except for access’ exemptions for vehicles over 7.5 tonnes. This therefore does not preclude access to the site for large construction vehicles.</p> <p>There are no recorded accident patterns or clusters across the local highway network that would indicate an existing highway safety issue. This has been informed by accident records collated by the Police and held by CDC and NLC.</p>

	<p>disruption to residents and emergency services</p> <p>long-term noise and disturbance</p> <p>These impacts would affect all local road users throughout the construction period.</p>	<p>An Outline Construction Traffic Management Plan [APP-182] has been submitted which sets out proposed temporary traffic mitigation measures, with priority given to background traffic. The local highway network will be managed to avoid conflicting vehicle movements where appropriate. The Applicant is committed to a highway condition survey, as set out in the Outline Construction Traffic Management Plan [APP-182], which is secured by requirement 16 of the Draft DCO [Document Reference 3.1 Revision 3].</p>
	<p>8. Noise, Lighting, and Operational Disturbance</p> <p>Noise from inverters, substations, and cooling equipment, combined with night-time security lighting, would erode rural tranquillity, affecting both residents and wildlife.</p>	<p>The assessment of potential impacts of the scheme are considered with the respective chapters of the Environmental Statement, namely</p> <ul style="list-style-type: none"> • ES Chapter 13: Noise and Vibration [APP-050] • ES Chapter 14: Air Quality & Greenhouse Gases [APP-051] • ES Chapter 16: Other Environmental Topics [APP-053] <p>Measures to control any potential impacts are secured, where appropriate, through the Outline Plans and secured via Schedule 2 of the Draft DCO (Document Reference 3.1 Revision 3). The outline plans comprise:-</p> <ul style="list-style-type: none"> • Outline Construction Environmental Management Plan (Document Reference 7.1 Revision 2) • Outline Operational Environmental Management Plan [APP-177] • Outline Decommissioning Environmental Management Plan [Document Reference 7.3 Revision 2]
	<p>9. Heritage and Historic Landscape Impact</p> <p>The Axholme landscape is historically significant, shaped by centuries of drainage and traditional agriculture. The development would harm historic field patterns, landscape character, and cultural identity.</p>	<p>Paras 6.5.35 and 6.5.66 of the ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2] considers the effects upon landscape character of the Order Limits, which was deemed to be Significant. It also considers the effects upon the landscape character of character types and character areas as defined by the City of Doncaster Council and North Lincolnshire Council, which are deemed to be Not Significant.</p> <p>ES Appendix 8.1 Heritage Baseline Assessment [APP-085] and ES Chapter 8 Cultural Heritage and Archaeology [APP-045] provide a robust and comprehensive assessment of the potential effects of the Scheme upon relevant archaeology, built heritage and historic landscape assets including LC14 – Isle of Axholme. The effects upon</p>

		<p>the Isle of Axholme were assessed as minor harm and deemed to be Not Significant.</p>
	<p>10. Lack of Community Benefit</p> <p>There is no meaningful benefit for local residents:</p> <ul style="list-style-type: none"> no discounted electricity or local energy sharing no substantial community fund no guaranteed local employment no improvement to infrastructure or services <p>Residents bear all of the environmental, visual, and lifestyle burdens with none of the benefit.</p>	<p>The Applicant notes that the Scheme would deliver a range of environmental, social community benefits and these are set out in Section 4.9 of the Planning Statement [APP-030]. Specific reference is made to paragraph 4.9.28 of the Planning Statement [APP-030] which sets out how the Applicant is committed to providing a Community Benefit Fund totalling approximately £12.8 million distributed over the lifespan of the Scheme, ensuring communities receive ongoing support and benefits.</p>
	<p>11. Failure to Consider Alternatives</p> <p>The applicant has not demonstrated serious consideration of less intrusive options, such as:</p> <ul style="list-style-type: none"> solar panels on rooftops of homes, farms, and businesses solar canopies over car parks brownfield, industrial, or derelict sites land adjacent to motorways or major roads former mine sites (e.g., Hatfield) or former factories/power stations <p>These options could generate energy without destroying farmland or rural character. The choice of high-quality agricultural land in a rural community is therefore unjustified.</p>	<p>The Applicant notes that the Scheme’s considerations of alternatives is set out within the ES Chapter 3: Site Description, Site Selection and Iterative Design Process [APP-040]. In addition, the suggested alternative options (rooftops, car parks, brownfield sites, land adjacent to transport networks and former mine sites) are not suitable alternative options and would not provide the same scale of renewable energy as the Scheme offers. Many domestic and industrial buildings are either structurally unsuitable, lack the necessary grid connectivity, or are cost-prohibitive due to high initial installation expenses. As a result, ground-mounted solar installations—particularly on agricultural land—are essential to delivering the volume of solar power required to meet the UK Government expectation of reaching 70GW of installed solar capacity by 2035.</p>
	<p>12. Policy Conflicts</p> <p>The proposal conflicts with:</p> <ul style="list-style-type: none"> protection of high-quality agricultural land avoidance of cumulative industrialisation maintaining rural character and visual amenity safeguarding biodiversity sustainable development principles that benefit local communities <p>The scheme fails to meet national and local planning requirements.</p>	<p>The Applicant’s position is set out in the Policy Compliance Document [APP-031] which provides a detailed schedule of all relevant national policies and demonstrate how the Scheme responds to and complies with that Policy.</p>

	<p>13. Conclusion</p> <p>The Tween Bridge Solar Farm would result in:</p> <ul style="list-style-type: none"> substantial landscape and visual harm permanent industrialisation of open countryside loss of productive farmland harm to wildlife and ecosystems increased flood and drainage risk major construction, traffic, and safety impacts loss of rural amenity and residential enjoyment reduced attractiveness and potential property value loss lack of meaningful community benefit unjustified selection of high-quality farmland over suitable alternatives conflict with planning policy <p>I respectfully request that the Examining Authority refuse development consent for the Tween Bridge Solar Farm.</p>	<p>This is noted. Each point has been discussed independently above.</p>
<p>Chelsea Schofield</p>	<p>To Whom It May Concern, Address: (Redacted) Subject: Formal objection to the Tween Bridge Solar and Battery Energy Storage Project.</p> <p>I am submitting this Relevant Representation as a resident and the owner of the access lane directly affected by the proposed Tween Bridge Solar Farm (EN010148). I strongly object to the application on the grounds of landscape impact, loss of agricultural land, ecological harm, traffic and construction disturbance, flood risk, noise, glint and glare, and the cumulative burden of energy infrastructure already affecting this area. Additionally under the disability Act and Equality Act 2010/public sector equality duty, (Redacted) I am writing to register my strong objection to the proposed Tween Bridge development by RWE.</p> <p>This is an industrial scale project and is wholly inappropriate to the location due to the environmental sensitivity to the site. This project would cover up to 4000 acres and it would convert open rural land into a massive industrial site. This is not an appropriate development for this countryside location. Whilst we are not opposed to solar energy, in fact we support renewable energy but there are more suitable brown field sites for installing this type of energy farm. There is to be major industrialisation from junction 5-6 of the M18 and the solar panels should be put on warehouse roofs not Green land. We are concerned that if this proposed site gets passed that these green field sites will lose their protected status and we want these to be preserved.</p>	<p>The Applicant notes the representations that have been submitted and that some information has been redacted. The Applicant requested an unredacted version of the representation from the Planning Inspectorate but was not provided with a copy due to General Data Protection Regulations. The Applicant's responses are therefore limited to the information provided in the representation. The respondent can contact info@tweenbridgesolar.co.uk to discuss and provide further details</p> <p>Traffic and Construction Disturbance</p> <p>The submission is supported by and Outline Construction Traffic Management Plan [APP-182] which considers the impacts of the Scheme during the construction phase and sets out management and mitigation measures that will be implemented to minimise disruption.</p>

	<p>The proposal for the solar panels within close proximity to my home will infringe my quality of life and lifestyle and result in my loss of amenities & according to reports in other countries this will also devalue my property. I feel that by removing all fields surrounding my property and lane access to my home will help to maintain our amenities and quality of life.</p> <p>I would request to a 100 metre distance around my property boundary the start of any solar panels including my access lane that I legally own and require daily access without congestion or safety risks. This project will undermine rural heritage and will be a visual blight and an attack on our shared landscape.</p> <p>I object particularly all fields which are surrounding my house as the open flat nature of the land makes this development highly visible and intrusive, it will destroy natural views and this area is highly residential. Vegetation around the farm Dry grass + electrical equipment = a bad combo. If something arcs or overheats, dry vegetation can catch quickly</p>	<p>Whilst it is acknowledged in the Residential Visual Amenity Assessment [APP-062] that there will be adverse visual effects upon Severals Farm, this property already benefits from mature garden vegetation to the south and west, limiting views towards the Scheme in these directions.</p> <p>Landscape mitigation is proposed around the property, which has included offsetting the Scheme to the east and west of the property and avoiding any proposed solar arrays to the north. In addition, the Scheme will be surrounded by native hedgerows to the east, west and north, including native scattered tree planting. The access track from Crow Tree Bank will also feature a new native tree lined hedgerow, with new native tree lined hedgerows surrounding the Scheme beyond the M180 motorway to the south., this is presented on the ES Figure 6.4: Landscape & Visual Mitigation Strategy [Document Reference 6.4.6.4 Revision 2]. The ES Volume 2 Chapter 8: Cultural Heritage and Archaeology [APP-045] has duly identified and considered the historic landscape.</p>
	<p>My lane is the direct access to such land and surrounding therefore I should have legally being informed. I would request that none of this land is included, as my access lane to my home would be directly impacted by heavy construction traffic, posing risks to safety, accessibility, and the structural condition of the lane itself.</p> <p>The people owning the land of the proposed solar farms do not actually live here and it is unfair to the residents to change the nature and the landscape in which people have purchased their properties, as most of the residents in this area have purchased their properties in orders to live among and to preserve nature. To note to this the application has being made (Redacted) and noticed given to lane and property is actually in ownership by myself which was purchased this year 2025 not Mr Frank Preston, Paul Preston or Daniel Preston therefore at no point have I legally being informed under the title SYK659074 Land on the westside of crow tree bank, throne , Doncaster.</p>	<p>The Applicant makes reference to the Outline Construction Traffic Management Plan [APP-182] which sets out proposed temporary traffic mitigation measures, with priority given to background traffic. The local highway network will be managed to avoid conflicting vehicle movements where possible. The Applicant is committed to a highway condition survey, as set out in the Outline Construction Traffic Management Plan [APP-182], which is secured by requirement 16 of the Draft DCO [Document Reference 3.1 Revision 3].</p> <p>There are no recorded accident patterns or clusters across the local highway network that would indicate an existing highway safety issue. This has been informed by accident records collated by the Police and held by CDC and NLC.</p>
	<p>Confidential considerations (Redacted)</p>	
	<p>The applicant's drainage proposals and modelling appear insufficiently detailed and do not provide confidence that risks to surrounding properties and land have been appropriately addressed.</p>	<p>The Applicant notes that the ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2] has been prepared to fully assess flood risk to the Proposed Development and the impact of the Proposed Development on flood risk on Site and elsewhere. Extensive flood</p>

		<p>risk mitigation measures are proposed on Site which will ensure the Proposed Development remains safe over its lifetime and that the impact of the Proposed Development on floodplain storage is mitigated by raising solar PV panels and associated infrastructure above the modelled 1 in 1,000 year flood level plus 100mm of freeboard. An Outline Surface Water Drainage Strategy is also included in the ES Appendix 10.1 Flood Risk Assessment [Document Reference 6.3.10.1 Revision 2]. The Outline Surface Water Drainage Strategy will manage surface water runoff from the Proposed Development, ensuring surface water runoff rates and associated flood risk do not increase.</p>
	<p>The fire risk is substantial to my property given that the lane is extremely difficult for fire services to attend due to isolation and this puts us at greater risk.</p> <p>Solar panels do hold a risk due the following. Whilst I understand it is low the risk, this is increased for myself given the direct access to my house is via the lane in which you propose to place solar panels and surrounding my property. I would ask that these be removed from the project to avoid endangering human life.</p> <p>DC arcs – Solar arrays run on high-voltage DC, and DC arcs don't self-extinguish like AC arcs. If an arc happens—usually from damaged cables or bad connectors—it can ignite nearby materials. My house is surrounded by fields making me isolated if a fire was to occur I would in effect be boxed in.</p> <p>Inverters and combiner boxes These pieces of equipment handle a lot of power. Failures inside them which can happen especially from poor maintenance or degraded components, can start fires. Rodents or weather damage Chewed wires or cables damaged by storms can expose conductors and increase ignition chances. These fields have been used for many years to grow wheat therefore may still hold some possibility of seed growth and production.</p>	<p>The Applicant refers to the Outline Battery Safety Management Plan [APP-179] which sets out the measures and procedures to avoid and reduce the risk of fire from battery energy storage systems within the Scheme, as well as how to effectively manage a fire should the event occur.</p>
	<p>This lane is not suitable for the volume, size, or frequency of construction vehicles anticipated, and the applicant has not adequately assessed or mitigated these impacts.</p> <p>There are 200,000 accidents a year on uk roads due to deer & we are already on two lethal roads.</p>	<p>An assessment of the potential effects of the traffic is set out in the ES Chapter 12 Transport and Access [APP-049]. It concludes that the Scheme is acceptable in transport and traffic terms and that there will be No (adverse) Significant effects, subject to the implementation of the identified mitigation measures, presented in the Outline Construction Traffic Management Plan [APP-182].</p>
	<p>There are also unresolved concerns about ecological impacts, including habitat disruption and displacement of wildlife</p>	<p>ES Chapter 7: Ecology and Nature Conservation [AS-012] sets out the baseline information and provides an assessment of the likely effects of the Scheme on ecological features during its construction, operation and decommissioning phases. The assessment is</p>

	<p>Migratory animals are an essential part of our area & the immeasurable carbon saving of this project does not justify the destruction of the green belt & eco systems.</p> <p>The scale & disturbance of this project will cause irreparable ecological damage including the disruption of breeding & migratory behaviour</p> <p>The Solar Farm areas and the residential habitats - Ecological consequences Areas D1, D8, D9, D13 and D14 all lie near Thorne and Hatfield Moores which is home to sensitive wet land bird species and other bio diversity. The scale and disturbance of this project will cause irreparable ecological damage, including disruption of breeding and migratory behaviour such as brown hare. We know barn owls live on our premises (which I have proof of them within the area), these birds hover over the nearby land to catch their prey, the prey will be easily sheltered by solar panels, so these birds will loose their feeding grounds. We have documented proof of protected birds in the fields surrounding us. Yellow hammer and grey partridges are often on the lane or within the fields to the west side of crow tree bank lane along with nesting birds such as woodland and Hedgerow, water vole, great crested newts and bats which are all protected animals. I ask to see documented proof of these same reports being carried out by you in our area. A car down a lane for a few hours a day, over a couple of days is not an adequate ecological survey. The reports seen at your consultations show that you have no desire to protect any species not already endangered, such as wild deer. We have proof that deer live in this area, we see them every day, you cannot identify where they breed because you have not been here long enough to find out but they are on the land daily and in the adjoining fields and my lane. If you push them on to the roads there are huge articulated lorries in this area, it's not only a danger to the animals it's also a danger to human life, you only have to look at police reports for this area to see how dangerous these roads currently are, there are accidents on Crowtree Bank & Sandtoft Road at the rate of 4/5 a year on both, not at the moment caused by deer. With deer being corralled onto the roads you are going to create a major problem with the articulated Lorries. We will lose all rural character whilst gaining nothing. Noise Despite the continual improvements on inverter designs and transformers to reduce noise emissions, land would be better used as a buffer zone between the big swathes of arable land and residential areas, this will significantly reduce the impact of the noise to residents from the solar farm and then this area can continue to serve as habitat for wildlife, enhancing the biodiversity.</p>	<p>informed by a raft of site surveys which are provided in the Technical Appendices supporting Chapter 7 [APP-072, AS-014, AS-015, APP-075, APP-076, APP-077, AS-016, APP-079, APP-080, APP-081, APP-082, AS-017].</p> <p>Noise and vibration matters are considered through ES Chapter 13: Noise and Vibration [APP-050]. The ES chapter concludes that with use of embedded construction phase mitigation measures in place, subject to the implementation of the identified mitigation measures, presented in the form of the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2], the Scheme is unlikely to result in any significant adverse effects on any of the identified noise sensitive residential and non-residential receptors.</p>
	<p>Consultation process. The consultation process has been inadequate, individual houses have not received any notification whatsoever of this project, which is wholly unacceptable for a project of this size and impact. Many locals remain unaware of the scale of this project or the implication of it including myself who has yet to be legally made aware regarding my own ownership of the land which you have failed to recognise. Public consultations have simply been a formality where people have been told what is going to happen and not being clearly informed that they can object to this. Or even that their objections will be considered, as the importance of the objection lies with the company and not with the objector. When applying for residential planning permission, an authority sends written</p>	<p>The Applicant's consultation methodology was developed in consultation and agreed with the host authorities. The methodology is outlined in the Consultation Report [APP-022]. This property is located within the 'Primary Consultation Zone' where letters were sent to the residents. The letters were addressed to the properties rather than the occupiers within the properties and therefore the change of ownership should not have impeded the communication from the Applicant.</p>

	<p>notifications to all neighbours in order to object, so why hasn't this same process taken place with this?</p>	<p>Copies of the consultation material is provided in the appendices of the Consultation Report [APP-023, APP-024, APP-025, APP-026, and APP-027].</p>
	<p>No meaningful community benefits, energy discounts or job guarantees have been offered. This is exploitation of residents & not a consultation.</p>	<p>As set out in Paragraph 4.9.28 of the Planning Statement [APP-030], in addition to the environmental and recreational benefits set out above, the Applicant is committed to providing a Community Benefit Fund of approximately £12.8 million across the 40-year operational lifespan of the Scheme. Typically, funds would be managed by an independent third party who support fund applicants to ensure the funds are as accessible as possible and recruit a panel of local people to make decisions on fund allocations. ES Chapter 11: Socio Economics [APP-048] sets out how significant beneficial effects are expected in relation to employment and economic contribution during both the construction and decommissioning phases, and business rates during the operational phases. Additionally, during the construction and decommissioning phases there will be no adverse impacts on local tourism as there is sufficient capacity to accommodate workers, therefore the additional workforce will provide a boost to local accommodation and tourism businesses.</p>
	<p>The Loss of highly productive and high yielding agricultural land. The land proposed for development includes high grade agricultural soil that currently supports food production. This is good fertile land & removing it from farming and food security is completely unjustifiable. Once covered in panels and infrastructure this productive land is lost forever, as over a period of time the planning legislation will change and this area will not longer be classed as green belt. Uncertain payoff. South Yorkshire & indeed this area is already overwhelmed by large-scale energy infrastructures. This project adds to a growing & unsustainable concentration of industrial development in our countryside. Solar & battery systems have their own environmental costs - extraction, production, transportation, and eventual disposal.</p>	<p>Matters pertaining to agricultural land classification are assessed within ES Chapter 15: Agricultural Circumstances [APP-052]. The Order Limits comprises a mixture of land quality, from Grade 1 to Subgrade 3b. The Order Limits contains approximately 813ha of BMV land, representing 44.4% of the Order Limits, and approximately 1,001ha of moderate quality Subgrade 3b land. 17ha of mitigation land will remain in arable farming use, with no effect on land quality. The pattern of distribution of land quality is complex. Soils are loamy or sandy. The Agricultural Land Classification grade will not be changed by the Scheme and impacts to the quality of soil would generally be temporary and reversible (with works all being completed in accordance with the Outline Soil Management Plan [Document Reference 7.8 Revision 2] and Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2]).</p>
	<p>Where are the guarantees for full decommissioning, recycling & ecological restoration? This project risks becoming another source of long term pollution & environmental.</p>	<p>With regards to decommissioning, the Applicant confirms that the Outline Decommissioning Environmental Management Plan</p>

		<p>[Document Reference 7.3 Revision 2] sets out the framework through which decommissioning will be implemented. The preparation of a Decommissioning Environmental Management Plan is secured through Requirement 19 of the Draft DCO [Document Reference 3.1 Revision 3].</p>
	<p>Local residents will suffer all the consequences: traffic, noise, landscape degradation, and loss of rural character – while gaining &nothing. .</p> <p>The associated noise, dust, and disturbance during both construction and operation would materially affect residential amenity. In addition, the site is sensitive in terms of drainage and flood risk. Large-scale hard infrastructure, soil compaction, and altered water flows risk exacerbating flooding locally.</p>	<p>Construction Environmental Impacts</p> <p>The Applicant has extensive experience in building and operating solar farms which has informed the preparation and submission of the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 2]. The purpose of this document is to provide a clear and consistent approach to the control of construction activities undertaken within the Order Limits. This document sits alongside the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2].</p>
	<p>Finally, this development cannot be considered in isolation. The area is already host to multiple major energy projects, and the cumulative visual, environmental, and community effects are significant. The addition of another large-scale scheme would further intensify these pressures. For these reasons, I strongly object to the Tween Bridge Solar Farm proposal and request that the Examining Authority give full weight to the substantial impacts on residents, landowners, and the local environment.</p> <p>Yours sincerely</p>	<p>ES Chapter 17: Cumulative Impacts [APP-054] considers the potential for cumulative effects arising as a result of the Scheme. Significant beneficial cumulative residual effects have been identified for socio economic matters, with all other cumulative residual effects for matters including landscape, ecology, transport, flooding, air quality, agriculture circumstances, considered to be not significant.</p>
<p>Shane Oxer</p>	<p>I object to the proposed solar development on the grounds that:</p> <ol style="list-style-type: none"> 1. The site is in or near a recognised floodplain. Large-scale solar infrastructure – panels, inverters, cabling, battery units, and access tracks – increases surface water run-off and reduces the natural ability of the land to drain. Installing thousands of posts and compacted tracks on land already vulnerable to flooding poses a direct risk to neighbouring homes, farmland, and road networks. National planning policy requires solar schemes to avoid flood-risk areas unless absolutely necessary and to demonstrate that they will not increase downstream flooding. This proposal fails that test. 2. The project does not have a confirmed or deliverable grid connection. A solar NSIP or major development should not progress without a defined and technically viable connection point. Approving a scheme without a firm grid connection creates a risk of “speculative” development that may never deliver power yet causes permanent landscape and agricultural damage. It also gives the public no clarity about which substations or transmission lines will be impacted. Given current grid constraints and 	<p>The Applicant’s position is set out in the Policy Compliance Document [APP-031] which provides a detailed schedule of all relevant national policies and demonstrate how the Scheme responds to that Policy.</p> <p>In response to point 1, the Applicant notes that a ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2] has been prepared to fully assess flood risk to the Proposed Development and the impact of the Proposed Development on flood risk on Site and elsewhere. Extensive flood risk mitigation measures are proposed on Site which will ensure the Proposed Development remains safe over its lifetime and that the impact of the Proposed Development on floodplain storage is mitigated by raising solar PV panels and associated infrastructure above the modelled 1 in 1,000 year flood level plus 100mm of freeboard. An Outline Surface Water Drainage Strategy is also included in the ES Technical Appendix 10.1: Flood Risk</p>

	<p>multi-year delays to reinforcements, the absence of a confirmed connection is a fundamental flaw.</p> <p>3. Solar output in winter is extremely poor. UK solar production collapses during winter – exactly when national electricity demand is highest. On short winter days, generation often falls to 2–5% of installed capacity. As a result, fossil-fuel or nuclear back-up must always be available to cover the gap. This means the bill payer effectively pays twice:</p> <p>once for the solar capacity and again for the dispatchable back-up required to ensure security of supply. This dual-cost system directly increases electricity prices while delivering no meaningful winter resilience.</p>	<p>Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2].</p> <p>The approach set out in the Outline Surface Water Drainage Strategy will manage surface water runoff from the Proposed Development, ensuring surface water runoff rates and associated flood risk do not increase.</p> <p>In response to point 2, the Applicant’s approach not to include grid connection elements is entirely consistent with national energy policy – the National Policy Statements for energy infrastructure explicitly endorse the consenting of electricity network infrastructure separately from the generation asset element of a proposed development when required. The Applicant notes that the purpose for this policy is that the necessary renewable energy infrastructure can progress without waiting for the grid connection element to progress in tandem and leading to a sterilising effect on development coming forward. The grid connection will then subsequently be consented and delivered. The Applicant draws attention to the number of energy generation schemes which have been consented separately to their grid connection (which has been consented subsequently). This encompasses a range of solar, onshore and offshore wind and nuclear in the NSIP and Town and Country Planning Act context. These schemes demonstrate that it is entirely the government’s intention to allow generating projects to progress without confirmed grid connection both at the time of application submission and at the point of consenting a scheme.]].</p> <p>The Applicant makes reference to Annex 1 of the Applicant’s Written Summary of Oral Submissions made at Issue Specific Hearing 1 (Document Reference 8.5) which presents a detailed explanation of the position and wider policy and regulatory context.</p> <p>Turning to point 3, Paragraph 2.10.1of EN-1 (December 2025) confirms how the UK has huge potential for the deployment of solar power as it’s a cost-effective and effective technology. Paragraph 2.10.2 of EN-1goes on to reaffirm how “Solar energy is at the heart of our Clean Power 2030 Mission. The government is committed to working with industry to radically increase our existing solar capacity by 2030 to boost growth across the country, create thousands of high-skill, future-proofed jobs and tackle the climate crisis.” Paragraph 2.10.5 of EN_1 also reiterates how “Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation.” In terms of annual energy production of a solar farm, it is expected that c70% of annual production is derived between the months of April to October. The co-locating of Battery Energy Storage System at</p>
--	---	---

		<p>Tween Bridge Solar Farm creates many benefits with the technologies being complementary in many ways. A traditional PV solar park would export the electricity produced to the local electricity network at the time it is produced but the addition of a BESS gives the applicant the alternative strategy of holding on to that electricity and releasing it to the local electricity network later in the day, thus positively contributing towards the security of supply. Security of supply is discussed at section 4.5 of the Planning Statement (APP-030).</p>
<p>Rachel Barker</p>	<p>The failure of other large scale solar farms (with some being shut down because they were inefficient). The contradictions between this proposal and the impact of other infrastructure proposals in the area. What happens if the panels need to be removed and disposed of, the rights involved with the land when/if the panels become useless/defunct. The traffic. The destruction of a natural aesthetic. Destruction of countryside. Impact on wildlife. Pollution – in particular to aquatic life. Flood risk, soil compaction, history of the area (ie it is artificially drained land). Compensation for those effected by the flooding and a plan for this in place before it happens... do to the size of the changes in the area and that it's drained land it isn't comparable to many places. Effect on the region and that it's a diversion from the natural trajectory of the area (which is going well). Where the panel are being made and the environment impacts of their manufacture and transport... as well as security concerns. Food prices in the uk and the use of farmland. Etc</p>	<p>The Applicant considers the points raised by Ms Barker in turn:</p> <p>In terms of decommissioning, the Applicant confirms that the Outline Decommissioning Environmental Management Plan [Document Reference 7.3 Revision 2] sets out the framework through which decommissioning will be implemented. The preparation of a final Decommissioning Environmental Management Plan is secured through Requirement 19 of the Draft DCO [Document Reference 3.1 Revision 3].</p> <p>Turning to traffic, an assessment of the potential effects of the traffic is set out in the ES Chapter 12 Transport and Access [APP-049]. It concludes that the Scheme is acceptable in transport and traffic terms and that there will be No (adverse) Significant effects, subject to the implementation of the identified mitigation measures, presented in the form of the Outline Construction Traffic Management Plan [APP-182].</p> <p>Turning to landscape matters, ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2] assess the Scheme's potential Landscape & Visual impacts, and is supported by several studies to inform the assessment [APP-061 through to APP-069]. The ES chapter acknowledges from the outset that, in common with almost all commercial energy development proposals, some landscape and visual effects would occur as a result of the Scheme. Some significant adverse effects are identified (to ground cover and the landscape character of the site and immediate surroundings during construction and at operation to the landscape character of the site and immediate surroundings, some residential receptors, some users of the public rights of way network and canal corridor and some users of the transport network), but these are highly localised and limited in nature, with many of the effects reduced by Year 15 following implementation of the landscape mitigation</p>

		<p>planting. Indeed, this planting would result in significant beneficial effects in terms of the hedgerow network within the Scheme.</p> <p>Turing to wildlife, all ecology matters, including aquatic life, are assessed within the Environmental Statement (ES), in particular ES Chapter 7: Ecology and Nature Conservation [AS-012] and the Report to Inform Habitat Regulations Assessment [Document Revision 5.3 Revision 3]. The ES concludes that with embedded design measures and mitigation in place, the Scheme will not result in any significant adverse effects on any habitats or species, statutory or non-statutory designated sites. Beneficial effects are anticipated as a result of habitat creation and diversification accompanied by long-term habitat management for the benefit of biodiversity.</p> <p>In terms of flood risk, the Applicant notes that a ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2] has been prepared to fully assess flood risk to the Proposed Development and the impact of the Proposed Development on flood risk on Site and elsewhere. Extensive flood risk mitigation measures are proposed on Site which will ensure the Proposed Development remains safe over its lifetime and that the impact of the Proposed Development on floodplain storage is mitigated by raising solar PV panels and associated infrastructure above the modelled 1 in 1,000 year flood level plus 100mm of freeboard. An Outline Surface Water Drainage Strategy is also included in the ES Appendix 10.1 Flood Risk Assessment [Document Reference 6.3.10.1 Revision 2]. The Outline Surface Water Drainage Strategy will manage surface water runoff from the Proposed Development, ensuring surface water runoff rates and associated flood risk do not increase.</p> <p>With regards to diversification, matters pertaining to agricultural circumstances are assessed within ES Chapter 15: Agricultural Circumstances [APP-052]. The ES concludes how there are 20 farm businesses with land within Parcels A to E of the Scheme. The land is all used for arable cropping and the impacts on all farm businesses are minor adverse or negligible, which is not significant. There are no significant adverse effects on food production or security, or the wider land-based rural economy. The Applicant notes the urgent need for low carbon energy generation of all types is established through NPSs. The Applicant consider the Scheme would make a meaningful contribution to meeting this need, would help in the transition to a low carbon system and would help</p>
--	--	---

		<p>increase security of supply. Reference is made to NPS-1 which sets out the need for new nationally significant electricity infrastructure and the Critical National Priority for low carbon infrastructure, including solar photovoltaic electricity generating stations.</p>
<p>Beverley Georgiou</p>	<p>To Whom It May Concern,</p> <p>Address: (Redacted)</p> <p>Subject: Formal objection to the Tween Bridge Solar and Battery Energy Storage Project. I am writing to register my strong objection to the proposed Tween Bridge development by RWE.</p> <p>This is an industrial scale project and is wholly inappropriate to the location due to the environmental sensitivity to the site. This project would cover up to 4000 acres and it would convert open rural land into a massive industrial site. This is not an appropriate development for this countryside location. Whilst we are not opposed to solar energy, in fact we support renewable energy but there are more suitable brown field sites for installing this type of energy farm. There is to be major industrialisation from junction 5-6 of the M18 and the solar panels should be put on warehouse roofs not Green land.</p> <p>We are concerned that if this proposed site gets passed that these green field sites will lose their protected status and we want these to be preserved.</p> <p>I object particularly to zones D1, D8 and D9 on the attached map as the open flat nature of the land makes this development highly visible and intrusive, it will destroy natural views and this area in particular is highly residential. The people owning the land of the proposed solar farms do not actually live here and it is unfair the residents to change the nature and the landscape in which people have purchased their properties as most of the residents in this area have purchased their properties in orders to live among and to preserve nature. This project will undermine rural heritage and will be a visual blight and an attack on our shared landscape. We will loose all rural character whilst gaining nothing. Noise Despite the continual improvements on inverter designs and transformers to reduce noise emissions, areas D1, D8 and D9 would be better used as a buffer zone between the big swathes of arable land and residential areas, this will significantly reduce the impact of the noise to residents from the solar farm and then this area can continue to serve as habitat for wildlife, enhancing the biodiversity.</p> <p>The Solar Farm areas and the residential habitats – Ecological consequences Areas D1, D8, D9, D13 and D14 all lie near Thorne and Hatfield Moores which is home to sensitive wet land</p>	<p>The Applicant’s position is set out in the Policy Compliance Document [APP-031] which provides a detailed schedule of all relevant national policies and demonstrate how the Scheme responds to that Policy.. Solar generation is a critical part of the UK’s strategy to achieve net zero by 2050. The Applicant makes reference to Section 4 of the Planning Statement [APP-030] which details the needs for and benefits of the Scheme.</p> <p>The Applicant can confirm that recent research by scientists from the RSPB and University of Cambridge (Copping et al2025) ⁴ has shown that solar farms contain a greater bird abundance and species richness than arable farmland and that solar farms can benefit biodiversity in arable-dominated landscapes.</p> <p>The Applicant considers that the mitigation and enhancement measures proposed, including the native habitat creation across the Order Limits, comprising large areas of neutral grassland in the place of intensively managed arable farmland, new native hedgerows and trees, and improved water quality and soil conditions as a consequence of a cessation in intensive farming practices will ensure opportunities for wildlife are enhanced. These measures are set out within the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2].</p> <p>Within the Relevant Representation provided by the City of Doncaster Council (CDC) [RR-006], they state that <i>‘It is considered that the cessation of agricultural inputs and physical disturbance from ploughing and harrowing will have a beneficial impact on water quality and this is accepted.’</i> The Applicant considers that this provides further supporting detail on this point.</p>

⁴ Copping, J. P., Waite, C. E., Balmford, A., Bradbury, R. B., Field, R. H., Morris, I., & Finch, T. (2025). Solar farm management influences breeding bird responses in an arable-dominated landscape. *Bird Study*, 72(3), 217–222. <https://doi.org/10.1080/00063657.2025.2450392>

	<p>bird species and other bio diversity. The scale and disturbance of this project will cause irreparable ecological damage, including disruption of breeding and migratory behaviour.</p> <p>Our house is visited yearly by swifts and house martins with up to 30 nests per year, these birds return annually and reproduce several times a season. They rely on the wet fields that surround our house, in order to build their homes and collect food.</p> <p>The field to the north of our house, surrounded by areas D1 and D9, is a collection point for thousands of migratory geese when arriving or preparing for the winter. We know little owls live on our premises, these birds hover over the nearby land to catch their prey, the prey will be easily sheltered by solar panels, so these birds will lose their feeding grounds. We have documented proof of protected birds in the fields surrounding us - the yellow wagtail nests in the lane to the east of our house. Skylarks nest in the field marked D4. We also have lapwings in the field to the east of us.</p> <p>A year ago we conducted a bat report, which cost substantial amounts of money, these bats along with a barn owl live in our barn and forage from the surrounding fields at dusk. We ask to see documented proof of these same reports being carried out by you in our area. A car down a lane for a few hours a day, over a couple of days is hardly an ecological survey. The reports seen at your consultations show that you have no desire to protect any species not already endangered, such as wild deer. We have proof that deer live in this area, we see them every day, you cannot identify where they breed because you have not been here long enough to find out but they are on the land daily. If you push them on to the roads there are huge articulated lorries in this area, it's not only a danger to the animals it's also a danger to human life, you only have to look at police reports for this area to see how dangerous these roads currently are, there are accidents on Crowtree Bank & Sandtoft Road at the rate of 4/5 a year on both, not at the moment caused by deer. With deer being corralled onto the roads you are going to create a major problem with the articulated Lorries. There are 200,000 accidents a year on UK roads due to deer & we are already on two lethal roads.</p> <p>Migratory animals are an essential part of our area & the immeasurable carbon saving of this project does not justify the destruction of the green belt & eco systems. The scale & disturbance Migration of this project will cause irreparable ecological damage including the disruption of breeding & migratory behaviour.</p>	<p>Areas D8 and D9 include mitigation planting around the periphery of the panel areas as set out on ES Figure 6.4 Landscape and Visual Mitigation Strategy [Document Reference 6.4.6.4 Revision 2].</p> <p>The Applicant confirms that there is a commitment to delivering at least 10% Biodiversity Net Gain across the Order Limits, which will provide further ecological enhancements for wildlife. The Applicant confirms that there is a commitment, under Requirement 8 of the Draft DCO [Application Document 3.1 Revision 3] to delivering at least 10% Biodiversity Net Gain across the Order Limits, which will provide further ecological enhancements for wildlife.</p> <p>As part of the mitigation strategy, the Applicant can confirm that discussions have been undertaken with Natural England and the relevant Local Authorities and their input received in designing the measures to ensure opportunities remain for bird species that utilise the area, including non-breeding and breeding birds. These measures are set out within the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2].</p> <p>The Applicant can also confirm that a full suite of ecological surveys have been undertaken across the Order limits, following the standard guidelines and within the optimal survey periods, and that the scope of the survey methods was agreed with the relevant local Authorities and Natural England in the first instance. The surveys results are appended to the Environmental Statement and include ES Appendix 7.13 Bat Activity Report [AS-017], Es Appendix 7.2 Breeding Bird Survey Report [AS-014], ES Technical Appendix 7.3 Non-Breeding Bird Survey Report [Document Reference 6.3.7.10 Revision 2], ES Technical Appendix 7.6 Otter and water Vole Survey Report [Document Reference 6.3.7.6 Revision 2]</p> <p>The Applicant will position mammal gaps to ensure connectivity through the Order Limits and to ensure potential foraging habitat for a wide range of wildlife is provided, as detailed in the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2], updated at Deadline 1. In addition, the Applicant has designed the fencing to enable corridors and therefore connectivity throughout the Order Limits. The Applicant also considers that the cessation of intensive arable farming that will improve water quality and native habitat creation proposed, including hedgerows, neutral</p>
--	---	---

		<p>grassland and trees, will ensure foraging opportunities are enhanced across the Order Limits.</p> <p>The Applicant confirms that detailed measures are included within an Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] to mitigate potential impacts during construction, including from lighting and potential human disturbance.</p> <p>There are no recorded accident patterns or clusters across the local highway network that would indicate an existing highway safety issue. This has been informed by accident records collated by the Police and held by CDC and NLC.</p>
	<p>Consultation process. The consultation process has been inadequate, individual houses have not received any notification whatsoever of this project, which is wholly unacceptable for a project of this size and impact. Many locals still remain unaware of the scale of this project or the implication of it. And public consultations have simply been a formality where people have been told what is going to happen and not being clearly informed that they can object to this. Or even that their objections will be considered, as the importance of the objection lies with the company and not with the objector. When applying for residential planning permission, an authority sends written notifications to all neighbours in order to object, so why hasn't this same process taken place with this? Local residents will suffer all the consequences: traffic, noise, landscape degradation, and loss of rural character – while gaining & nothing. No meaningful community benefits, energy discounts or job guarantees have been offered. This is exploitation of residents & not a consultation. Our house This project is proposing to install solar panels on the boundary of my property to the north, east and south. This will infringe my quality of life and lifestyle and result in my loss of amenities & according to reports in other countries this will also devalue my property.</p>	<p>The Applicant considers the consultation carried out to be robust. The process of engagement with both public regulators and statutory bodies, alongside those likely to have an interest in the application is set out within the Applicant's Consultation Report [APP-022]. The Design Approach Document [APP-032] and ES Chapter 3: Site Selection, Site Description and Iterative Design Process [APP-040] discuss the design process and the decisions that were made, including the Scheme design principles identified to frame the design decisions, in order to minimise landscape and visual impacts and consider the LVIA analysis at ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2]. The layout design at submission has been influenced by consultation feedback throughout both stages of consultation. The Applicant notes that the Scheme would deliver a range of environmental, social community benefits and these are set out in Section 4.9 of the Planning Statement [APP-030].</p> <p>With regards to property values, the Applicant makes reference to the Planning Practice Guidance Determining a Planning Application, whereby under material considerations it states (Applicant emphasis in bold and underlined) <i>"A material planning consideration is one which is relevant to making the planning decision in question (eg whether to grant or refuse an application for planning permission). The scope of what can constitute a material consideration is very wide and so the courts often do not indicate what cannot be a material consideration. However, in general they have taken the view that planning is concerned with land use in the public interest, so that the protection of purely private interests such as the impact of a development on the value</i></p>

		<p><i>of a neighbouring property or loss of private rights to light could not be material considerations.”</i></p>
	<p>We were told at the consultation meeting by the project manager that we were entitled to 100 metre distance around our property boundary and the start of any solar panels. We feel that by removing zones D1, D8 and D9 this will help to maintain our amenities and quality of life. Loss of highly productive and high yielding agricultural land.</p>	<p>The Design Parameters Document [Document Reference 5.6.1 Revision 3] sets out a minimum 50m buffer from any residential dwellings, however the Applicant can confirm that the offset between the respondent’s dwelling and nearest solar field exceeds 100m. The Applicant confirms that the Scheme previously included an additional field of solar in proximity to the respondent’s property, which was referred to as field D1. Solar is no longer proposed in this field as part of the DCO Application.</p>
	<p>The land proposed for development includes high grade agricultural soil that currently supports food production. The field to the north of our house was in the Guinness book of records for the highest yield of corn per acre in the country. This is good fertile land & removing it from farming and food security is completely unjustifiable. Once covered in panels and infrastructure this productive land is lost forever, as over a period of time the planning legislation will change and this area will not longer be classed as green belt.</p>	<p>Matters pertaining to agricultural land are assessed within ES Chapter 15: Agricultural Circumstances [APP-052]. The ES concludes how there are 20 farm businesses with land within Parcels A to E of the Scheme. The land is all used for arable cropping and the impacts on all farm businesses are minor adverse or negligible, which is not significant. There are no significant adverse effects on food production or security, or the wider land-based rural economy.</p>
	<p>Uncertain payoff. South Yorkshire & indeed this area is already overwhelmed by large-scale energy infrastructures. This project adds to a growing & unsustainable concentration of industrial development in our countryside. Solar & battery systems have their own environmental costs – extraction, production, transportation, and eventual disposal. Where are the guarantees for full decommissioning, recycling & ecological restoration? The nearby wind farms are destined to be left to rot when no longer viable. This project risks becoming another source of long term pollution & environmental harm.</p> <p>Yours sincerely Beverley Georgiou Contact 07850 776653 Also on behalf of: Howard & Jane Grady Websters Insulation, (Redacted) Peter & Carol Flint, Swallows Nest, Crowtree Bank, high Levels, Thorne, Doncaster.</p>	<p>ES Chapter 17: Cumulative Impacts [APP-054] considers the potential for cumulative effects arising as a result of the Scheme. Significant beneficial cumulative residual effects have been identified for socio economic matters, with all other cumulative residual effects for matters including landscape, ecology, transport, flooding, air quality, agriculture circumstances, considered to be not significant.</p> <p>With regards to decommissioning, the Applicant confirms that the Outline Decommissioning Environmental Management Plan [Document Reference 7.3 Revision 2] sets out the framework through which decommissioning will be implemented. The preparation of a Decommissioning Environmental Management Plan is secured through Requirement 19 of the Draft DCO [Document Reference 3.1 Revision 3].</p>
<p>Jane Vivien Warrener Grady</p>	<p>As already placed on record when we attended the session you held at Crowle, we are opposed to the ENO10148 Tween Bridge for the following concerns:</p> <ol style="list-style-type: none"> 1. Health concerns linked to vibration, hum & glare from the panels in the nearby fields, (Redacted) 	<p>The Applicant acknowledges the representations and notes that some information has been redacted for GDPR reasons.</p>

	<ol style="list-style-type: none"> 2. We have worked hard for this property over many years, the area will be unacceptably changed out of all recognition & will not be the same place. We have chosen to live here for a quality of life : health & safety, to rare wildlife which comes off the nearby protected moors, this area is very close to areas of protected species such as Night Jars amongst other species etc. 3. Risks of fire and other hazards too near our home to be comfortable. 4. Opposed to large acres of land being taken out of food production, concern with the balance between food security as well as energy security 5. Flood risks, the solar panel project can't be compatible with sodden land. 6. Too much unacceptable change to the look of the significantly altered landscape. 7. The level of potential work and related noise going on to set up the panels over a 24 hour period is potentially intolerable to people already suffering from health conditions 8. This area is already saturated with other power sources such as the nearby wind farms and power station. 	<p>All the items raised have been considered and assessed with the application submission. Impacts on amenity and environmental considerations have been assessed in the Environment Statement.</p> <p>With regards to point 1, noise and vibration matters are considered through ES Chapter 13: Noise and Vibration [APP-050]. The ES chapter concludes that with use of embedded construction phase mitigation measures in place, subject to the implementation of the identified mitigation measures, presented in the form of the Outline Construction Traffic Management Plan [APP-182], the Scheme is unlikely to result in any significant adverse effects on any of the identified noise sensitive residential and non-residential receptors. During the operational phase, the noise and vibration impacts are, at worst, Minor adverse, requiring no specific mitigation measures. ES Chapter 16: Other Environmental Topics [APP-053] provides the applicant assessment on Glint and glare. The chapter is supported by detailed Glint and Glare Assessments [APP-122 & APP123]. The ES concludes that no significant effects are predicted on any nearby residential receptors.</p> <p>With regards to point 2, all ecology matters, including potential effects on nightjar, are assessed within the Environmental Statement (ES), in particular ES Chapter 7: Ecology and Nature Conservation [AS-012] and the Report to Inform Habitat Regulations Assessment [Document Reference 5.1 Revision 3].</p> <p>With regards to point 3, the Applicant refers to the Outline Battery Safety Management Plan [APP-179] which set out the measures and procedures to avoid and reduce the risk of fire from battery energy storage systems within the Scheme, as well as how to effectively manage a fire should the event occur.</p> <p>Mitigation measures, including those relating to disturbance (e.g. lighting, noise and construction activity), are secured through the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 2] and the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2], which are secured via Requirements 14 and 8 of the draft DCO [Document Reference 3.1 Revision 3].</p> <p>With regards to point 4, matters pertaining to agricultural circumstances are assessed within ES Chapter 15: Agricultural Circumstances [APP-052]. The ES concludes how there are 20 farm businesses with land within Parcels A to E of the Scheme. The land is all used for arable cropping and the impacts on all farm</p>
--	---	--

		<p>businesses are minor adverse or negligible, which is not significant. There are no significant adverse effects on food production or security, or the wider land-based rural economy.</p> <p>With regards to point 5, the Applicant notes that a ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2] has been prepared to fully assess flood risk to the Scheme and the impact of the Scheme on flood risk on Site and elsewhere. Extensive flood risk mitigation measures are proposed on Site which will ensure the Scheme remains safe over its lifetime and that the impact of the Scheme on floodplain storage is mitigated by raising solar PV panels and associated infrastructure above the modelled 1 in 1,000 year flood level plus 100mm of freeboard. An Outline Surface Water Drainage Strategy is also included in the ES Technical Appendix 10.1: Flood Risk Assessment Parts 1 & 2 [Document Reference 6.3.10.1 Revision 2]. The Outline Surface Water Drainage Strategy will manage surface water runoff from the Scheme, ensuring surface water runoff rates and associated flood risk do not increase.</p> <p>Turning to point 6, ES Chapter 6: Landscape and Visual [Document Reference 6.2.6 Revision 2] assess the Scheme’s potential Landscape & Visual impacts, and is supported by several studies to inform the assessment [APP-061 through to APP-069]. The ES chapter acknowledges from the outset that, in common with almost all commercial energy development proposals, some landscape and visual effects would occur as a result of the Scheme. Some significant adverse effects are identified (to ground cover and the landscape character of the site and immediate surroundings during construction and at operation to the landscape character of the site and immediate surroundings, some residential receptors, some users of the public rights of way network and canal corridor and some users of the transport network), but these are highly localised and limited in nature, with many of the effects reduced by Year 15 following implementation of the landscape mitigation planting. Indeed, this planting would result in significant beneficial effects in terms of the hedgerow network within the Scheme.</p> <p>With regard to point 7, the Applicant notes that the core construction hours for the Scheme would be 7am to 7pm Monday to Saturday, and 9am to 1pm on Sunday, and this would be secured by requirement 14 – a final Construction Environmental Management Plan, and requirement 16 – a final Construction Traffic Management</p>
--	--	--

		<p>Plan as set out in the Draft DCO [Document Reference 3.1 Revision 3].</p> <p>Turing to point 8, ES Chapter 17: Cumulative Impacts [APP-054] considers the potential for cumulative effects arising as a result of the Scheme. Significant beneficial cumulative residual effects have been identified for socio economic matters, with all other cumulative residual effects for matters including landscape, ecology, transport, flooding, air quality, agriculture circumstances, considered to be not significant.</p>
<p>Charlotte Boerescu-Kelly</p>	<p>I am writing to register as an Interested Party and to support the Tween Bridge Solar Farm proposal. I live near the area with family nearby, and regularly use the roads and footpaths, so I know the area well. Living here, you can't ignore how the Humberhead Levels are changing. After heavy rain, the stretch between Moorends and the Moor Road drainage channel often sits under water, and flooding has become something we all just "deal with." That's one of the main reasons I support this project. We need serious, long-term measures that cut emissions and stabilize our energy system, or this region will face even worse pressures in the years ahead. I already see the Tween Bridge Wind Farm from my garden, and it's never bothered me. What affects my day-to-day life far more is the rising cost of energy and the unpredictability of the grid. A project that can generate up to 800 MW of clean power, backed by battery storage, feels like a practical benefit for households across Doncaster and the Isle of Axholme. I know some people are worried about farmland, but much of this land is used flexibly anyway. The fact that sheep grazing can continue, and that the plans include new hedgerows and wetland habitats, makes this feel more like a managed landscape improvement than a loss. On evening walks near the Levels I often see lapwings and barn owls; if the project genuinely strengthens habitats, that is something I welcome. For all these reasons, I support the Tween Bridge Solar Farm</p>	<p>The Applicant welcomes the support for the Scheme.</p>