



Tween Bridge Solar Farm

9.6 Statement of Common Ground with Lincolnshire Wildlife Trust

Deadline 1 May 2026

Document Reference: 9.6

Revision 1



Statement of Common Ground

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1 Introduction

1.1. Purpose of this document

- 1.1.1. This Statement of Common Ground (hereafter referred to as the 'SoCG') has been prepared to support the Examination of the Development Consent Order (DCO) application (the 'DCO Application') for Tween Bridge Solar Farm (the 'Scheme').
- 1.1.2. The DCO Application is for a Nationally Significant Infrastructure Project (NSIP) for the construction, operation (including maintenance) and decommissioning of a solar photovoltaic (PV) array electricity generating facility, Battery Energy Storage System (BESS) and associated infrastructure which would allow for the generation and export of electricity.
- 1.1.3. The SoCG is a 'live' document that has been prepared by the Applicant and the the Lincolnshire Wildlife Trust.
- 1.1.4. The SoCG has been prepared in accordance with the Guidance for examination of DCO applications which was published in 2024 by the Department for Levelling Up, Housing and Communities¹.
- 1.1.5. This Guidance comments that:
- "A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree, or indeed disagree. A SoCG helps to ensure that the evidence at examination focuses on the material differences between the main parties and therefore makes best use of the lines of questioning pursued by the Examining Authority'.*
- 1.1.6. The aim of this SoCG is to therefore provide a clear position of the progress and agreement made or not yet made between the Applicant and the Lincolnshire Wildlife Trust on matters relating to the Scheme. Where matters are yet to be agreed, the parties will continue to proactively work to reach agreement.
- 1.1.7. The SoCG will be updated as more information becomes available and as a result of ongoing discussions between the Applicant and the Lincolnshire Wildlife Trust.

¹ Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (April 2024)

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1.2. Parties to this Statement of Common Ground

- 1.2.1. This SoCG has been prepared by (1) the Applicant and (2) the Lincolnshire Wildlife Trust.
- 1.2.2. The Lincolnshire Wildlife Trust 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 Lincolnshire Wildlife Trust is supported by over 27,000 members across Lincolnshire.
- 1.2.3. Collectively, the Applicant and the Lincolnshire Wildlife Trust are referred to as 'the parties'.

1.3. Terminology

- 1.3.1. Section 3 of this document sets out the relevant matters raised through discussion between the parties. It provides a summary of the position of each party and identifies the status of discussions on each matter:
- 1.3.2. "Agreed" indicates where the issue has been resolved between the parties and is not anticipated to be subject to further discussions;
- 1.3.3. "Under discussion" indicates where a matter remains in active dialogue between the parties and a final position has not been reached;
- 1.3.4. "Not Agreed" indicates where the parties have established a final position that they cannot resolve the matter and will remain a point of difference.

2 Record of Engagement

2.1. Summary of consultation and engagement

2.1.1. The parties have been engaged in consultation and engagement throughout the development of the Scheme. Table 2-1 shows a summary of the meetings and correspondence that has taken place between the Applicant and the Lincolnshire Wildlife Trust in relation to the Scheme. This is limited to engagement which is materially relevant to the contents of this SoCG and does not seek to include every correspondence between the parties (e.g. that which was primarily administrative).

2.1.2. Table 2-1: Record of Engagement

Table 2-1 – Record of Engagement since 2023		
Date	Method	Purpose / Description
31 January 2023 onwards	DCO Consultation	The Scheme has been through the pre-application and acceptance process where the details of the scheme have been made publicly available for comments from interested parties.
11 December 2023	Letter	Lincolnshire Wildlife Trust submitted a letter in response to the non-statutory consultation.
20 March 2025	Formal Consultation	The Applicant informed the Lincolnshire Wildlife Trust of the pre-submission statutory consultation. No response was received during the consultation period.
July 2025	Email	Lincolnshire Wildlife Trust contacted the Applicant to advise they intend to provide a formal written response, but no response was provided.
12 February 2026	Email	The Applicant contacted the Lincolnshire Wildlife Trust to arrange a meeting following the receipt of their Relevant Representation.
16 February 2026	Email	The Applicant confirmed a meeting time and sent a meeting request to the Lincolnshire Wildlife Trust for the 02 March 2026.

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18 February 2026	Email	The Applicant confirmed the meeting time and asked the Lincolnshire Wildlife Trust if prior to the meeting, they can provide any information regarding whether the Wildlife Trust can provide mitigation land for skylark.
23 February 2026	Email	The Lincolnshire Wildlife Trust respond to the mitigation land skylark query and asked for the number of skylark plots required to be confirmed and stated that this was something that they regularly support
23 February 2026	Email	The Applicant thanked the Lincolnshire Wildlife Trust for their response and their confirmation that they regularly support the provision of skylark mitigation land. The Applicant stated that the exact extent of mitigation and numbers of skylark requiring mitigation was to be confirmed.
02 March 2026	Online Meeting	Meeting to discuss the Relevant Representation response Lincolnshire Wildlife Trust's consultation response
18 March 2026	Email	The Lincolnshire Wildlife Trust sent summary notes to the Applicant of the meeting on the 02 March 2026.
19 March 2026	Email	The Applicant sent the draft Statement of Common Ground (SoCG) to the Lincolnshire Wildlife Trust and stated that they would welcome any comments from Lincolnshire Wildlife Trust, and would be grateful if these could be provided by the close of play on 3 April 2026.
24 March 2026	Email	The Applicant sent the Lincolnshire Wildlife Trust the meeting notes from the 02 March 2026 and asked for any changes needed to this note to be provided. The Applicant confirmed further meetings are planned with the local authorities and Natural England with any relevant information forwarded to the Lincolnshire Wildlife Trust and that any additional information regarding invertebrate surveys will be provided.
26 March 2026	Email	The Lincolnshire Wildlife Trust stated that a meeting was booked with their Head of Conservation, who is our signatory on all SoCG on the 8 th April to review and that a response with comments and edits will be provided following that discussion.

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14 April 2026	Email	The Lincolnshire Wildlife Trust confirmed that the draft was reviewed by their Head of Conservation and an internal position agreed. The Lincolnshire Wildlife Trust stated that they are unable to countersign or endorse the SoCG in its current format and associated content
29 April 2026	Email	The Applicant sent the Lincolnshire Wildlife Trust an update on the project, confirming that comments received in Relevant Representations and from meetings have been addressed in updated reports to be submitted at Deadline 1. The Applicant also issued the invertebrate survey report that was submitted with the original application and confirmation on this survey scope. The Applicant suggested a further meeting with the Lincolnshire Wildlife Trust once updated reports have been reviewed.

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3 Current Position

- 3.1.1. The table below provides a summary of the current position of the Applicant and Lincolnshire Wildlife Trust in relation to specific matters that have been under discussion to date.
- 3.1.2. Where a matter is not represented in the table, it should be assumed that it is either: (i) agreed between the parties and has not been the subject of detailed discussion; or (ii) not relevant to the discussion between the parties.
- 3.1.3. As noted above, this is a 'live' document and there are some aspects that are still under discussion between the parties. The intention is to provide a final position in subsequent versions of the SoCG, addressing and identifying where changes have been made and where agreement had been reached between the parties.

Table 3-1: Current Position:

Ref	Topic	Lincolnshire Wildlife Trust Position	Applicant Position	Status
		<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>II. III. IV. V. 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</p>	<p>Under Discussion</p>

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		<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>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 submitted a 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 Environmental Statement (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 through the DCO process.</p>	
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		<p>Bird Impacts VI.</p> <p>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. 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, demonstrating that lapwing do not rely on any one area in the Order Limits.</p>	<p>Under Discussion</p>
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			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 been designed to ensure the habitat requirement of bird species present, including those functionally linked to the SPA, are provided.	
		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.	VII. The Applicant agrees that the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 2] provides provisions to replace lost nesting opportunities and compensatory land allocation with regards to skylarks.	Agreed
		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 warplings. As recognised, warplings 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	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 ES Figure 6.4 Landscape and Visual Mitigation Strategy [Document Reference 6.4.6.4 Revision 2] .	Under Discussion

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		<p>to account for this higher carrying capacity habitat.</p>	<p>The mitigation design completed by the Applicant, following consultation with Natural England, has been designed to ensure the habitat requirement 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)².</p> <p>The drainage scheme developed by the Applicant, as detailed in ES Volume 2 Chapter 10 Water Resource [APP-047] of the ES, demonstrates with regards to water resources, flood risk and drainage that with the implementation of the embedded design and additional mitigation measures to be</p>	
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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>

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			<p>implemented for the construction, operational and 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 CDC, 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 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>	
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			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.	
		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.	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.	Under Discussion
		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.	X. The Applicant welcomes the Wildlife Trust providing this information, although all BNG gains will be provided within the Order Limits.	Agreed
		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-	XI. The Applicant notes the comments raised by Lincolnshire Wildlife Trust regarding the classification of vegetation beneath solar panels. Within the Biodiversity Metric, the vegetation beneath the panels has been classified as neutral	Under Discussion

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		<p>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>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</p>	
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			determination of the Scheme, the Applicant will review the assessment and update the Biodiversity Metric where appropriate.	
		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.	XI. Agreed.	Agreed
		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.	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.	Under Discussion
		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'.	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. The Applicant consider that with the native habitat creation proposed across the Order	Under Discussion

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			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.	
		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>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, 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>	Under Discussion
		XVI. Insufficient detail has been provided within the invertebrate scoping report to determine if the level of survey effort	XVI. The Applicant considers the invertebrate survey effort is sufficient in determining the assessment for the Order Limits, especially when	Under Discussion

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		<p>was appropriate to assess the relative importance of these areas.</p>	<p>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 opportunities for invertebrate species. . The recent research by Copping et al . (2025), provides further clarity regarding this.</p> <p>The Applicants view is supported within the City of Doncaster Council Relevant Representation, they state with regards to invertebrates that <i>'An assessment of likely significant effects is provided at Section 7.5 of the ES, and this provides sufficient information.'</i></p> <p>The Applicants view is further supported within Natural England's Relevant Representation, where they state that: <i>'We note the findings of the Invertebrate Scoping Report, and acknowledge that the proposed enhancements suggested in the oLEMP will likely benefit invertebrates.'</i></p>	
		<p>XVII. In review and overlay mapping of LERC records for Area B a number of priority and S41 species appear to be</p>	<p>XVII. The Applicant acknowledges that there are LERC records for Area B, including a number of priority and S41 species .</p>	<p>Under Discussion</p>

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		<p>present on the bounds or within the arable fields identified for development.</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>	<p>Under Discussion</p>

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		<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>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 SSSI³.</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>	<p>Under Discussion</p>
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³ [Site feature condition](#)

4 Signatures

This Statement of Common Ground is agreed upon:

On behalf of Lincolnshire Wildlife Trust:

Name:

Signature:

Date:

On behalf of the Applicant:

Name:

Signature:

Date:

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