

Tween Bridge Solar Farm

8.10 Comments on Local Impact Reports (City of Doncaster Council)

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

Document Reference: 8.10

Deadline 2 May 2026

Revision 1

Comments on Local Impact Reports (City of Doncaster Council)

Table of Contents:

Table of Contents:	2
1 Introduction	3
2 Applicant’s Response to City of Doncaster Council Local Impact Report	4
3 Applicant’s Response to City of Doncaster Council Local Impact Report Appendix 1 – Additional Comments on Cultural Heritage	165
4 Applicant’s response to the City of Doncaster Council’s comments on the draft Tween Bridge Solar Farm Order	178

1 Introduction

- 1.1. This report sets out the Applicant's comments on matters raised in the Local Impact Report submitted by City of Doncaster Council to the Planning Inspectorate on 5th May 2026 at Examination Deadline 1, in respect of the Development Consent Order application (the 'Application') for Tween Bridge Solar Farm ('the Scheme').

2 Applicant's Response to City of Doncaster Council Local Impact Report

Table 1: Introduction

Ref	Topic Summary	Applicant's Response
1.1	This Local Impact Report ("LIR") has been produced by City of Doncaster Council ("the Council") in response to the Tween Bridge Solar Farm Project ("the proposed development"). The proposed development is being progressed by an application for Development Consent by RWE Renewables UK Solar and Storage Limited ("the Applicant").	This is noted by the Applicant and no response is required.
1.2	Under Section of the Planning Act 2008, Local Planning Authorities are invited to submit a LIR as part of the DCO process. Section 60(3) of the Act defines the LIR as 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'.	This is noted by the Applicant and no response is required.
1.3	The Council understands that the primary purpose of the LIR is to identify any potential	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	local impact of the proposed development and identify the local planning policies insofar as they are relevant to the proposed development, and the extent to which the proposed development accords with the policies identified. The LIR does not assess the compliance of the proposed development with national planning policy or guidance.	
1.4	The content of the LIR is a matter for the local authority concerned as long as it falls within this statutory definition but is a means by which the impacts and their significance are presented, with the Examining Authority ("the ExA") undertaking a balancing exercise, in the consideration of such impacts.	This is noted by the Applicant and no response is required.
1.5	The Council has had regard to the purpose of the LIR as set out in Section 60(3) of the Planning Act 2008 (as amended) and the Planning Inspectorate's Advice for Local Authorities in preparing this LIR.	This is noted by the Applicant and no response is required.
1.6	Topic based headings set out how the Council considers the proposed development accords with relevant planning policy and any potential local impact of the development. These	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	headings are a combination of the matters raised in the Council's Relevant Representation [RR-006] and topics considered in the Environmental Statement submitted with the application.	
--	---	--

Table 2: Scope

Ref	Topic Summary	Applicant's Response
2.1	The proposed development is a renewable energy scheme, with the Order limits amounting to approximately 2,414 hectares (ha) of land and comprising Works defined in Schedule 1 to the Draft Development Consent Order ("the Draft DCO") [A3-003] and shown on the various Works Plans [APP-009].	The Applicant clarifies that the Order Limits comprise 1,831 hectares, as stated in ES Chapter 3 Site Description, Site Selection and Iterative Design Process [Document Reference 6.1.3 Revision 2] and the Planning Statement [Document Reference 5.5 Revision 2] .
2.2	A full description of the proposed development is provided in ES Chapter 2: Scheme Description [APP-039] and a summary of the Works and the component parts of the proposed development are set out in summary form below:	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	(a) Ground-mounted solar PV generating station and associated mounting structures; (b) On-site supporting equipment including inverters, transformers and switchgear; (c) A BESS including batteries and associated enclosures, monitoring systems, air conditioning, electrical cable and fire safety infrastructure. The BESS is indicatively split into four separate 100MW compounds. Each 100MW compound would be located next to and connected to one of the seven on-site 132kV Substations; (d) Seven on-site 132kV Substation compounds, including transformers, switchgear, circuit breakers, control equipment buildings, control functions, material storage, parking, as well as wider monitoring and maintenance equipment; (e) Low voltage and 33kV interconnecting cabling to connect and transmit electricity from the solar PV modules, inverters and BESS to one of the seven on-site 132kV Substations; (f) RWE on-site 400kV Substation;	
--	---	--

Comments on Local Impact Reports (City of Doncaster Council)

	(g) Underground 132kV interconnecting cabling to connect the seven on-site 132kV Substations to the RWE on-site 400kV Substation; (h) Underground 400kV interconnecting cabling from the RWE on-site 400kV substation to the edge of the Order Limits; (i) Associated infrastructure including access tracks, parking, CCTV, gates and fencing, lighting, drainage infrastructure, storage containers, earthworks, culverts, surface water management, maintenance and welfare facilities, security cabins and any other works identified as necessary to enable the development; (j) Horizontal Directional Drilling for selected cable works where open trenching or culvert(s) are not possible or appropriate, including the canal, railway and the M180; (k) Highways works to facilitate access for construction vehicles, comprising passing places where necessary to ensure that heavy goods vehicles (HGVs) can be safely accommodated amongst existing traffic, new or improved site accesses and visibility splays;	
--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

	(l) Environmental mitigation and enhancement measures, including landscaping, habitat management and biodiversity enhancement; (m) Permissive pathways and bird viewing gallery, and (n) Temporary development during the construction phase of the Scheme including construction compounds, parking, temporary diversions of Public Rights of Way, and temporary access roadways to facilitate access to all parts of the Order Limits.	
--	---	--

Table 3: Description of the Area

Ref	Topic Summary	Applicant's Response
3.1	The proposed development lies partly within the Council's administrative area and partly with the administrative area of North Lincolnshire Council.	This is noted by the Applicant and no response is required.
3.2	The LIR relies upon the Applicant's description of the site and surrounding area as set out in ES Chapter 3: Site Description, Site Selection and	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	Iterative Design Process [APP-040]. Characteristics of note are discussed in the following assessment where appropriate.	
--	--	--

Table 4: Relevant Planning History and Relevant Planning Permissions

Ref	Topic Summary	Applicant's Response
<i>Planning History, Cumulative Impacts and Relevant Planning Permissions</i>		
4.1	The Planning Statement [APP-030] refers to the planning history of the site being set out in Section 5 of the Planning Statement, but this is in fact not the case. LIR accordingly relies on the Applicant's list of relevant planning history relating to the site and surroundings set out in the Environmental Statement Appendix 17.1 Cumulative Long List [APP-126] and Environmental Statement Appendix 17.2 Cumulative Short List [APP-127] for the purposes of the Cumulative Impact Assessment set out in the Environmental Statement Chapter 17 Cumulative Impacts [APP-0054] and the update previously set out in the City of	The Applicant acknowledges the typo, and this has been removed in the Planning Statement submitted at Deadline 2 [Document Reference 5.5. Revision 2]. The Applicant confirms, the Cumulative Long List [APP-126] and Cumulative Short List [APP-127] are the appropriate documents for consideration of recent development proposals coming forward within and adjoining the Order Limits. The Applicant responded to CDC's relevant representation [RR-006] within the Applicant's Response to Relevant Representations [REP1-043] on pages 5-6.

Comments on Local Impact Reports (City of Doncaster Council)

	Doncaster Council's Relevant Representation [RR-006], Section 3	
4.2	In its Relevant Representation [RR-006], the Council reserved its position to make more detailed commentary on cumulative effects, explaining that whilst not committed developments at that point, two other substantial solar farm DCO projects within the Borough (and into neighbouring authorities), may have progressed in the meantime. In this respect, the following updates are provided: • Fenwick Solar Farm DCO was granted by the Secretary of State on 18 February 2026; and • Whitestone Solar Farm DCO1 is expected to be submitted in June 2026.	The Applicant acknowledges that Fenwick Solar Farm DCO has now been consented. This scheme was already robustly considered within the cumulative assessment and therefore no amendments to the assessment are required. The Applicant notes Whitestone Solar Farm is at the pre-application stage, however, considers no updates are required to the ES. The closest distance approximately between the Whitestone Solar Farm and the Order Limits is over 22km and therefore this development is outside the zone of influence of cumulative effects for the environmental disciplines assessed.

Table 5: Legislative & Policy Context

Ref	Topic Summary	Applicant's Response
5.1	The legislative basis for the proposed development is set out within The Planning Act 2008, which defines the process under which	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	consent for Nationally Significant Infrastructure Projects are determined.	
<i>National Policy Statements</i>		
5.2	In accordance with Section () 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.	This is noted by the Applicant and no response is required, other than confirmation that the relevant reference is section 104.
5.3	The relevant National Policy Statements ("NPSs ") include the Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero, published December 2025), the National Policy Statement for Renewable Energy and Infrastructure (EN-3) Department for Energy Security and Net Zero, published December 2025) and the National Policy Statement for Electricity Networks Infrastructure (EN-5) Department for Energy Security and Net Zero, published December 2025).	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

5.4	This represents the primary policy basis for the determination of this application. National Planning Policy Framework (2024).	This is noted by the Applicant and no response is required.
<i>National Planning Policy Framework (2024)</i>		
5.5	In accordance with Section 104(2)(d) of the Planning Act 2008, the NPPF is capable of being "important and relevant".	This is noted by the Applicant and no response is required.
5.6	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).	This is noted by the Applicant and no response is required.
5.7	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	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	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).	
<i>Local Planning Policy Context</i>		
5.8	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 () of the Planning and Compulsory Purchase Act 2004, the development plan in force for Doncaster comprises: • Doncaster Local Plan ("DLP") (adopted 2021) • Barnsley, Doncaster and Rotherham Joint Waste Plan ("JWP ") (adopted 2012).	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 [Document Reference 5.5 Revision 2] .
5.9	The Council consider the following policies of the DLP to be relevant: • Policy 2: Level of Growth • Policy 3: Employment Allocations • Policy 13: Promoting Sustainable Transport in New Developments	The Applicant notes that where there is a conflict between any development plan document and an NPS, the NPS prevails for the purposes of Secretary of State decision making given the national significance of the infrastructure.

Comments on Local Impact Reports (City of Doncaster Council)

	• 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	
--	---	--

Comments on Local Impact Reports (City of Doncaster Council)

	• Policy 39: Development Affecting Archaeology • Policy 48: Landscaping of New Developments • Policy 54: Pollution • Policy 58: Low Carbon and Renewable Energy	
5.10	The site falls partly with the area of the Thorne and Moorends Neighbourhood Development Plan, but a plan has not yet been adopted.	This is noted by the Applicant and no response is required.
5.11	The Council considers the following guidance and documents to be relevant: • Doncaster Renewable and Low Carbon Study (July 2012) which highlights • the key opportunities for different forms of renewable energy in the Borough • Landscape Character and Capacity Study (2007) • Biodiversity Net Gain Supplementary Planning Document (September 2022)	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	Local Labour Agreements Supplementary Planning Document (adopted August 2023)	
5.12	Other relevant Council initiatives include: - Doncaster Green Infrastructure Strategy 2014 – 2028 - Doncaster Delivering Together (“DDT”)	This is noted by the Applicant and no response is required.
5.13	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: - Tackling climate change. - Developing the skills to thrive in life and work. - Making Doncaster the best place to do business and create good jobs.	The Applicant notes that the DDT does not form part of the adopted development plan. Applicant's Response at row 5.9 is also applicable here.

Comments on Local Impact Reports (City of Doncaster Council)

	• 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.	
5.14	As set out in the City of Doncaster Council's Relevant Representation [RR-006], Section 5 CDC at its Full Council meeting on 18 September 2025 made the following resolution: 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;	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	2. To encourage the use of brownfield land for large-scale solar farms; 3. To actively encourage partnerships with private and public sector organisations to maximise the use of existing infrastructure for renewable energy projects; 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; 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.	
5.15	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 November 2025.	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

5.16	At a local level, Chapter 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).	This is noted by the Applicant and no response is required.
5.17	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: 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: A) Proposals will be supported which give priority to:	The Applicant notes the reference to CDC's DLP. <u>Applicant's Response at row 5.9 is also applicable here.</u>

Comments on Local Impact Reports (City of Doncaster Council)

	1. Community energy schemes that are in full or part community ownership; 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; 3. Heat or power generation from light, water, waste and other low carbon heat sources; 4. Landfill and sewage gas energy generation schemes; 5. Wind power projects which meet the criteria of Policy 59; and 6. Micro-renewable energy technologies and decentralised heat and power systems within new development. B) In all cases, low carbon and renewable energy proposals will be supported where they: 1. Have undertaken community engagement and demonstrate how they will deliver environmental, social and economic benefits;	
--	---	--

Comments on Local Impact Reports (City of Doncaster Council)

	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; 3. Allow the continued safe and efficient operation of Doncaster Sheffield Airport; 4. Would have no unacceptable adverse effects on highway safety and infrastructure; 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 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”.	
	-	Intentionally left blank. The CDC LIR does not include a paragraph 5.18. Numbering in this document matches that in the LIR for consistency.

Comments on Local Impact Reports (City of Doncaster Council)

5.19	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:	This is noted by the Applicant and no response is required.
5.20	In support of this policy, the Local Plan explains that renewable and low carbon sources of energy are central to achieving the Council's commitments to both reducing carbon emissions and combating the effects of climate change. 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.	This is noted by the Applicant and no response is required.
5.21	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).	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

5.22	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.	The Applicant notes this comment. The Applicant confirms the responses provided at row 5.9 and row 5.17 is also applicable here.
5.23	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	The Applicant confirms the responses provided at row 5.9, row 5.17 and row 5.22 are also applicable here. Notwithstanding this, the Applicant notes this Study was prepared to ensure the objectives set out in Doncaster's Core Strategy (2011) can be delivered. This Core Strategy is now superseded by the Council's adopted Development Plan. Furthermore, the study is now 14 years old and is not considered up to date and therefore not relevant.

Comments on Local Impact Reports (City of Doncaster Council)

	has significant biomass resource potential that could fuel district heating networks.	
5.24	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.	The Applicant agrees with CDC. The Applicant confirms in the Planning Statement [Document Reference [Document Reference 5.5 Revision 2] that, in accordance with the provisions of the NPS EN-1 and EN-3, it is concluded that the limited residual effects of the Scheme do not outweigh its urgent need and do not represent an unacceptable risk that would negate the presumption in favour of consent for the critical national priority.

Table 6: Assessment of Impacts

Ref	Topic Summary	Applicant's Response
6.1	This section of the LIR identifies the relevant local planning policies and how the application accords with them. It also considers the adequacy of assessment for each identified subject area and concludes whether the impacts will be positive, negative or neutral. The extent to which the Applicant has addressed	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	identified impacts and assessed them adequately, complying with local planning policy, is also considered.	
6.2	The Council has reviewed the DCO application and considers the local impacts arising from the following matters need to be brought to the attention of the ExA: • Principle of Renewable Energy and Impacts on Climate Change ; • Cultural Heritage; • Ecological Impacts and Biodiversity Net Gain; • Landscape and Visual Impact ; • Socio-economics and Land Use; • Transport and Access; • Flood Risk and Surface Water Drainage; • Amenity Impacts – Noise and Vibration and Air Quality; and • Glint and Glare (with specific reference to Doncaster Sheffield Airport).	This is noted by the Applicant and no response is required.
6.3	In assessing the local impacts of the proposed development, the Council has drawn on the	This is noted by the Applicant and no response is required

Comments on Local Impact Reports (City of Doncaster Council)

	expertise of both relevant qualified officers of the Council itself (on matters pertaining to cultural heritage, ecology and biodiversity net gain, trees, employment, transport, access and public rights of way) and external professional consultants (on landscape and visual impact and glint and glare impacts) to ensure that a suitably qualified response, based on local knowledge and expertise, is provided on each of the issues. Each local impact is considered in turn below.	
--	---	--

Table 7: Principle of Renewable Energy and Impacts on Climate Change

Ref	Topic Summary	Applicant's Response
Key DLP Policies:		
Policy 58: Low Carbon and Renewable Energy		
7.1	At a local level, Chapter 3 of the DLP 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	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	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).	
7.2	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: 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: A) Proposals will be supported which give priority to: 1. Community energy schemes that are in full or part community ownership; 2. Biomass and energy crop schemes especially	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	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 ; 3. Heat or power generation from light, water, waste and other low carbon heat sources ; 4. Landfill and sewage gas energy generation schemes; 5. Wind power projects which meet the criteria of Policy 59; and 6. Micro-renewable energy technologies and decentralised heat and power systems within new development. B) In all cases, low carbon and renewable energy proposals will be supported where they: 1. Have undertaken community engagement and demonstrate how they will deliver environmental, social and economic benefits; 2. Have no unacceptable adverse effects on local amenity and air quality, and include appropriate stand-off distances between	
--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

	technologies and sensitive receptors, such as residential areas; 3. Allow the continued safe and efficient operation of Doncaster Sheffield Airport; 4. Would have no unacceptable adverse effects on highway safety and infrastructure; 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 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”.	
7.3	In support of this policy, the DLP explains that renewable and low carbon sources of energy are central to achieving the Council’s commitments to both reducing carbon emissions and combating the effects of climate change. This is in line with the Council’s aspirations to become a low carbon borough. However, the DLP equally	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	recognises that the potential negative effects of these sources need to be carefully assessed and managed on a case -by-case basis.	
7.4	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).	This is noted by the Applicant and no response is required.
7.5	The policy seeks 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.	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

7.6	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.	This is noted by the Applicant and no response is required.
Key local issues		
7.7	The Grid Connection Statement [APP-O35] (paragraph 11.6 and 11.7) confirms that a connection to a new 400 kilovolt (kV) substation (the NGET 400kV Substation), which is to be consented and delivered separately by National Grid Electricity Transmission (NGET), will be provided via a 400kV export connection cable from a RWE on- site 400kV substation. The RWE on- site 400kV substation forms part	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	of the Scheme and therefore will be consented and delivered by the Applicant under the DCO. However, the Grid Connection Statement also confirms that the location of the NGET 400kV substation is not yet confirmed.	
7.8	As explained in ES Chapter 14: Air Quality and Greenhouse Gases [APP-051], states that 2,928,399 million tCO ₂ e will be saved when compared to Combined Cycle Gas Turbine-generated electricity , and that overall, the Scheme will lead to avoided GHG emissions by replacing electricity currently generated by more carbon intensive methods and enable the removal of fossil fuel generation from the UK electricity grid.	This is noted by the Applicant and no response is required. However, it should be noted that the savings will be marginally smaller than quoted, at 2,922,019 tonnes CO ₂ e, as set out in ES Chapter 14 Air Quality and Greenhouse Gases [Document Reference 6.2.14 Revision 2] .
7.9	The Planning Statement [APP-030] (paragraph 4.9.1) states that the proposed development will deliver approximately 800 MW of low-carbon and low-cost domestic solar electricity generation capacity connecting to the NETS. In addition to meeting the urgent national need for secure and affordable low-carbon energy infrastructure the Scheme will deliver wider benefits to the environment and the local community.	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

7.10	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, to comply with Policy 58, it must be demonstrated that there are no significant adverse environmental impacts that cannot be appropriately managed and/or mitigated through the DCO process.	This is noted by the Applicant and no response is required. However, it should be noted that the Scheme incorporates a number of best practice measures to minimise its GHG footprint and ensure no significant effects. These measures cover minimising the use of, and procurement of, sustainable construction materials, maintenance of the PV modules to maximise their design life and minimising waste to landfill. These measures will be developed during detailed design as part of continued evolution of the Outline CEMP [Document Reference 7.1 Revision 3], Outline Operational Environmental Management Plan (OEMP) [Document Reference 7.2] and Outline Decommissioning Environmental Management Plan (DEMP) [Document Reference 7.3 Revision 3] documents.
------	---	--

Comments on Local Impact Reports (City of Doncaster Council)

Table 8: Cultural Heritage

Ref	Topic Summary	Applicant's Response
Key DLP Policies • 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		
8.1	Policy 34 sets out the overarching principles by which Doncaster's heritage will be conserved.	This is noted by the Applicant and no response is required.
8.2	Policy 35 sets out the specific requirements the Council has in place to gain an understanding of the potential impact that the proposals will have on the significance of any heritage assets or historic environment likely to be affected.	This is noted by the Applicant and no response is required.
8.3	Policy 36 addresses listed buildings specifically, with Criterion (A) stating that proposals that enhance or better reveal the significance of a listed building or structure will be supported. Proposals that harm the significance of a listed	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	building or its setting will not be supported other than in circumstances where that harm is clearly outweighed by the public benefits of the proposal having regard to the significance of the heritage asset affected.	
8.4	Policy 37 sets out the principles against which development proposals affecting, or within the setting of, Conservation Areas will be assessed. Criterion (B) states that proposals should not detract from the heritage significance of a conservation area by virtue of their location, layout, nature, height, density, form, scale, materials, or design or by the removal of trees, the loss of important open spaces or other important landscape features, or through adverse impact on key views and vistas. Proposals that result in harm to a conservation area will be refused unless the harm is outweighed by public benefits arising from the development.	This is noted by the Applicant and no response is required.
8.5	Policy 39 states that development affecting archaeological remains will be assessed against the following principles: A) Development that would result in harm to the significance of a scheduled monument or	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	other nationally important archaeological assets will not be permitted other than in exceptional circumstances. B) Development affecting other archaeological assets will need to demonstrate how any benefits will outweigh harm to the site. When development affecting such sites is justifiable, the Council will seek to ensure preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for appropriate investigation and recording including excavation in accordance with Policy 35.	
Key Local Issues		
8.6	Cultural Heritage and Archaeological matters are addressed in Environmental Statement, Chapter 8: Cultural Heritage and Archaeology (Rev 1) [APP-045], supported by a series of technical appendices including a Heritage Baseline Assessment [APP-085]; Geophysical Survey Reports (Parts 1–7) [APP-086–APP 092]; a Geoarchaeological Assessment [APP-093]; a Trial Trenching Report (North Lincolnshire only) [APP-094]; and a Test Pitting Report (South Yorkshire only) [APP-095]. An Outline	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	Archaeological Mitigation Strategy [APP-096] has also been submitted.	
<i>Historic Landscape</i>		
8.1	As set out in CDC's Relevant Representation, it considers that the importance of the landscape comprising the Order limits and beyond in heritage terms has 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.	This question has been addressed in the Applicant's response to CDC's Relevant Representation at paragraph 8.1 [REP1-043] .
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	This question has been addressed in the Applicant's response to CDC's Relevant Representation at paragraph 8.2 [REP1-043] .

Comments on Local Impact Reports (City of Doncaster Council)

	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.	
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 general 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.	This question has been addressed in the Applicant's response to CDC's Relevant Representation at paragraph 8.3 [REP1-O43].
8.4	CDC is also concerned about impact on the pre-Vermuyden landscape with references to a distinctive type of farming undertaken in the North west corner of Lincolnshire which should	The Applicant is unclear how Young's survey can be taken to indicate the state of affairs pre-Vermuyden as his work at the Board of Agriculture began with his appointment in 1793

Comments on Local Impact Reports (City of Doncaster Council)

	be taken to include that part of Hatfield Chase area within the CDC administrative. These are provided in Arthur Young's survey work on behalf of the Board of Agriculture spanning the years of the late 18th century through to the late period of the Napoleonic war. Young observed that the Isle of Axholme warranted special consideration as field sizes and holdings were small in comparison to the remainder of Lincolnshire. Farmers often traded land for better plots but generally their land holdings were scattered and not arranged in contiguous ownership. From around 1950 there has been erosion of this type of farming practice particularly relating to the Isle of Axholme as many small holders of scattered land holdings have gradually sold their interests to larger farming operations and field sizes have become larger with historic buildings have been lost in the process, or altered beyond all recognition.	around 160 years after the conclusion of Vermuyden's drainage scheme. The special character of the Isle of Axholme noted by Young relates to the old enclosures within the core of the Isle as opposed to the Recently Enclosed Landscape of most of the Order Limits (as noted by Miller's 1997 HLC of the Isle of Axholme). The loss of historic field ditches and hedgerows within the areas of Vermuyden and Parliamentary enclosure have been identified across the Order Limits as a result of 20th Century alterations leading to larger fields that were optimised for increasingly large-scale, mechanised farming. As noted in Miller (1997) the process of mechanisation removed large numbers of stock-proof hedgerows that were mandated as field boundaries adjacent to drainage ditches within the various enclosure Acts. The mention of both hedges and stock indicate the degree to which the landscape has changed and evolved during the 20th-century both in terms of boundary treatment and in terms of type of agriculture.
--	---	---

Comments on Local Impact Reports (City of Doncaster Council)

8.5	What is so special about the land affected by the proposed solar farm is that the small field boundaries have survived because of the network of ditches and drains that cross the area being a vital part of the management of the land. Therefore, in other areas of the Isle, and or, neighbouring sites in the CDC administrative area whilst land holdings have adapted to changes, this distinctive area has not fundamentally changed. Therefore, going back to Arthur Young's analysis there has been considerably loss of local distinctiveness in the Isle particularly where land uses compete with modern day requirements such as residential development in the built-up areas and probably the land concerned has had lower agricultural production value.	This appears to conflict with the comment made by CDC at 8.4 above. Paragraph 8.4 acknowledges the erosion of the historic farming practices, increased mechanisation and the increase of field sizes that have led to changes within the landscape. The Scheme will not lead to the loss of any of the existing drainage ditches, nor will it alter the legibility of the field pattern.
8.6	The land affected by the proposed solar farm scheme is unique because of the survival of the historic landscape which is attributed to the drainage ditches but also the high value agricultural land capable of providing high yielding crops. The area around Moor Edges Road Thorne is not too dissimilar to areas in the Isle of Axholme where low scale farming was carried out on possibly no more than what would	The Applicant questions the validity of the statement that the land within Order Limits is unique due to the survival of drainage ditches. The presence of drainage ditches within areas of reclaimed land are widespread as parts of drainage schemes across other parts of England, for example in Cambridgeshire, Somerset and Worcestershire.

Comments on Local Impact Reports (City of Doncaster Council)

	be considered today as cottage holdings (i.e. something smaller than a small holding) around a dwelling. In most instances the dwellings at Moor Edges Road have been replaced by modern dwellings /bungalows, but the land use and boundaries show quite clearly the context of the dwelling around a small sliver of land. Again, there is a high survival rate of these types of holdings that can be identifiable with old established ways of farming. An interesting aside is the number of unknown ownerships throughout the scheme but around Moor Edges Road unknown ownerships are illustrative of a large number of owner s often owning small acreages and sometimes dispersed or not continuous land holdings. The heritage value associated with this area of the scheme is therefore very high in terms of historical interest but also aesthetic and communal interests.	The value of the agricultural land in relation to its BMV status or economic value is not a heritage matter. The Scheme will not lead to the loss of any of the existing boundaries nor will it alter the legibility of the field/plot pattern. This means that the small parcels of land associated with the cottages will also be unaffected as will their heritage value.
8.7	The heritage values which are found in Historic England's Conservation Principles Guidance and Policy for the Sustainable Management of the Historic Environment published in 2008 are important elements for the analysis, including impact analysis, of proposals. It is important to fully understand those values which relate to a historic place or landscape, comprising of the	As detailed at Appendix 3, Assessment Methodology, of the Environmental Statement Appendix 8.1 Heritage Baseline Assessment [APP-O85] the Applicant has considered the value of heritage assets in accordance with Conservation Principles and Historic England's GPA 2. The terminology employed within the setting assessments is derived from the

Comments on Local Impact Reports (City of Doncaster Council)

	four principal heritage values (Evidential value, Historical Value, Aesthetic Value and Communal Value) before considering the impact of proposals. Importantly the ES needs to be supplemented to show who and how the historic landscape is used and enjoyed	'interests' noted in the glossaries provided in NPPF and the PPG (namely Archaeological, Architectural, Artistic and Historic) as this conforms to the latest Historic England guidance on assessing heritage significance, HEAN:12 (2019). The Applicant considers the point raised regarding 'by whom and how the landscape is enjoyed' is exclusively an amenity issue not a heritage significance matter. In line with Historic England's guidance set out in GPA-3 it has not therefore been considered.
8.8	All structures within the order limits score highly in terms of heritage values with historical, aesthetic and communal values very evident. Also, evidential value particularly relating to below ground heritage is likely to be an important consideration. The ES has excluded residential properties which are described as "affected" which is taken to include properties where conditional contracts have been entered into for purchase and or where properties may have already been purchased by the applicant. These properties need to be included within the ES for analysis in order to understand their contribution to significance and distribution in	The Applicant has not discounted any built-heritage assets on the basis of their ownership from consideration in Appendix 3, Assessment Methodology, of the Environmental Statement Appendix 8.1 Heritage Baseline Assessment [APP-O85]. Any built heritage assets, within the Study Area (Order Limits, SZTV and 1km buffer around Order Limits) were assessed in accordance with the GPA-3 setting assessment methodology. Any assets discounted from detailed assessment were considered at Stage 1 of the process.

Comments on Local Impact Reports (City of Doncaster Council)

	the wider setting of the historic landscape. This is required before any impact analysis is undertaken.	The Applicant also highlights its response to CDC's Relevant Representation at paragraph 8.4 [RR-006] which notes the CDC's agreement to the scope and methodology for the assessment of built heritage assets at the EIA scoping stage.
8.9	CDC is concerned that the application details submitted relating to the landscape and heritage matters associated with the proposed scheme do not provide a full understanding of the heritage values which exist and are directly associated with the distinctive historic landscape. The primary concern of the ES appears to show that the proposals cause less than substantial harm to the landscape and heritage assets above and below the surface. Without defining those heritage values, attempting to justify the scheme in terms of limited harm, becomes a somewhat nebulous exercise.	The Applicant disagrees with the suggestion that the primary focus of the ES was to show the application resulted in no greater than less than substantial harm. As is documented in ES Volume 2 Chapter 8: Cultural Heritage and Archaeology [APP-045] several heritage assets were identified as being at risk of significant adverse effects without mitigation being introduced. The Applicant is clear that the assessment within the ES and the Environmental Statement Appendix 8.1 Heritage Baseline Assessment [APP-085] are robust and appropriate for decision making. The levels of effect detailed in the ES are the outcome of the application of the agreed assessment methodology. The comment regarding value appears to be similar to points raised above. The Applicant therefore notes that these concerns have been addressed in relation to paragraphs 8.4-8.8.
<i>Setting of Above Ground Heritage Assets</i>		

Comments on Local Impact Reports (City of Doncaster Council)

8.10	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.	This question has been addressed in the Applicant’s response to CDC’s Relevant Representation at paragraph 8.5[REP1-050].
8.11	Within the CDC administrative area, it is worth noting that the landscape character is one of dispersed rural farms and cottages. The A18	This comment was noted in the Applicant’s response to CDC’s Relevant Representation at paragraph 8.6 [REP1-050].

Comments on Local Impact Reports (City of Doncaster Council)

	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 but roadside. Consequently, the A18 does not provide a significant physical barrier to views and therefore the sense of vast openness between the isolated farmsteads on both sides of the A18 is most pronounced as is the characteristic of wide skies within the observed landscape.	
8.12	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.	This comment was noted in the Applicant's response to CDC's Relevant Representation at paragraph 8.7 [REP1-050].
8.13	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	This question has been addressed in the Applicant's response to CDC's Relevant Representation at paragraph 8.8 [REP1-050]. The approach to the assessment of this asset's setting is consistent with the methodology agreed with CDC at scoping and is in conformity with the GPA-3 process.

Comments on Local Impact Reports (City of Doncaster Council)

	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. CDC considers that historical heritage value associated with the heritage assets should be considered with the context of their distribution within the wider historic landscape and thus to have regard to a far wider setting than indicated in the ES which proposes artificial small settings around each heritage asset. The approach adopted in the ES appears to be inconsistent with relevant sections of Conservation Principles and Guidance.	The point raised regarding Conservation Principles is addressed in the response to paragraph 8.7, above.
8.14	In fact, Sand Hill Farm remains very visible from the track/access road (Jacques Bank), much further to the east, going over Dirtiness 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 impression of isolated openness as the wind farm in distant views provides a bookend for	This question has been addressed in the Applicant's response to CDC's Relevant Representation at paragraph 8.9 [REP1-050].

Comments on Local Impact Reports (City of Doncaster Council)

	these views over the distinctive generally flat countryside with wide skies.	
8.15	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.	This question has been addressed in the Applicant's response to CDC's Relevant Representation at paragraph 8.10 [REP1-050] .
8.16	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	This question has been addressed in the Applicant's response to CDC's Relevant Representation at paragraph 8.11 [REP1-050] .

Comments on Local Impact Reports (City of Doncaster Council)

	development would, in and of itself, cause harm in historic landscape terms.	
8.17	In this respect, CDC would also question how the existing historic watercourses could be properly managed and maintained with such planting in situ.	This question has been addressed in the Applicant's response to CDC's Relevant Representation at paragraph 8.12 [REP1-050] .
8.18	CDC has a number of detailed and specific points, details of which are set out in Appendix 1. These relate to further information and clarity required about the proposed scheme as described by the applicant in the introduction to the application. Further information and clarification is required in order to fully understand how the proposed scheme details will affect the historic and distinctive character of the area affected.	Responses to the specific questions are provided below at section 3.
<i>Archaeology</i>		
8.19	Archaeological matters are addressed within the Environmental Statement, Chapter 8: Cultural Heritage and Archaeology (Rev 1) [APP-045], supported by a series of technical appendices including a Heritage Baseline Assessment [APP 085]; Geophysical Survey Reports (Parts 1– 7) [APP-086–APP-092]; a Geoarchaeological	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	Assessment [APP 093]; a Trial Trenching Report (North Lincolnshire only) [APP-094]; and a Test Pitting Report (South Yorkshire only) [APP-095]. An Outline Archaeological Mitigation Strategy [APP-096] has also been submitted.	
8.20	The following comments have been provided by the South Yorkshire Archaeology Service (SYAS) which 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 through a Service Level Agreement by those authorities to provide each with archaeological advice. It sets out the SYAS response on behalf of CDC.	This is noted by the Applicant and no response is required.
8.21	In CDCs Relevant Representation and subsequently at Issue Specific Hearing[ISH1], SYAS, on behalf of CDC raised concerns that unresolved issues regarding the suitability and timing of archaeological techniques meant there was insufficient information to fully understand the likely impact of the proposals on the significance of affected heritage assets. The Applicant maintains that the assessment is robust, citing the inclusion of desk based	The position of CDC is noted by the Applicant who disagrees. The Applicant is clear that the assessment provided within ES Volume 2 Chapter 8: Cultural Heritage and Archaeology [APP-045] is robust and appropriate for decision making and supported by an extensive suite of surveys and research.

Comments on Local Impact Reports (City of Doncaster Council)

	research, LIDAR analysis, geoarchaeological assessment, geophysical survey, trial trenching and test pitting.	
8.22	Policy 35 of the Doncaster Local Plan sets out the Council's requirements for understanding the impact of development on heritage assets and the historic environment. Paragraph 11.9 states that: <i>"a heritage statement should include details of how the assets and their significances will be affected by the proposed development, demonstrate a clear understanding of the significances, and show how the proposals will minimise any adverse impacts on the asset and its setting."</i>	This is noted by the Applicant and no response required.
8.23	SYAS Standards and Guidance for Desk Based Assessments similarly requires that: <i>"the results of the research and site assessment will be reviewed and synthesised to produce an analytical report"</i> (paragraph . 6.1).	This is noted by the Applicant and no response required.
8.24	While the data collection undertaken is in itself thorough, the results are presented largely as an inventory, with limited synthesis or	The Applicant disagrees that the assessment provided is fundamentally weak.

Comments on Local Impact Reports (City of Doncaster Council)

	interpretation. The outputs of the various assessment techniques are combined primarily to populate the gazetteer, but there is little attempt to integrate or correlate their findings in order to develop a meaningful understanding of archaeological potential across the order limits. This lack of synthesis is a fundamental weakness of the assessment.	The data collated to allow a reasoned consideration of the heritage resource within the assessment which is in accordance with the standard and guidance set out by the Chartered Institute for Archaeologists and which is sufficient to determine the nature and character of the identified archaeological resource within the Order Limits to provide the necessary data for a mitigation strategy (either by design or by record).
8.25	For example, known sites are presented by period within the Heritage Baseline Assessment [APP-085, paragraphs 5.57–5.163], but patterns of activity or site distribution are not related to the landscape character and depositional environments identified in the Geoarchaeological Assessment [APP-093]. Similarly, LIDAR analysis identifies Thorne Mere and four undated enclosures as additional heritage assets, but the overall analysis is not related to the former river channels or roddens highlighted in the Geoarchaeological Assessment as capable of preserving extended palaeo-environmental records of landscape and land use change.	For clarity within Environmental Statement Appendix 8.1 Heritage Baseline Assessment [APP-085] differing periods have been treated separately and factually, as this is standard practice. Similarly, specialist matters such as geoarchaeological potential have been kept separate in the main body of the report. The conclusions at paragraph 7.1 – 7.17 clearly indicate the archaeological potential of the Order Limits and the possible need for/scope of additional, post-consent, investigation.

Comments on Local Impact Reports (City of Doncaster Council)

8.26	As a consequence, there is little attempt to draw together patterns of activity across periods or to identify any particular foci of settlement or exploitation. The resulting statements of significance and archaeological potential rely on broad characterisations of low or moderate potential. It is also not clearly articulated why certain areas are considered to have only moderate potential despite the documented density of prehistoric and Romano British material identified through HER data, cropmarks, PAS records, recent geophysical survey, and the presence of topographic and geological features, such as former river channels and peat deposits, known to favour both survival and preservation.	Possible foci of activity were investigated as part of the targeted shovel-pitting (Environmental Statement Appendix 8.5 Test Pitting Report [APP-095]) and the targeted trial trenching (Environmental Statement Appendix 8.4 Trial Trenching Report [APP-094]) that have been completed. The assertion that there is extensive recorded prehistoric activity within the Order Limits is misleading. Although there are large numbers of heritage assets recorded within the study area the number of assets recorded within the Order Limits is relatively limited. This is clearly demonstrated on Figures 2-8 in Environmental Statement Appendix 8.1 Heritage Baseline Assessment [APP-085]. The differentiation between areas of low or moderate potential is a result of the Applicant taking into account the findings of the geoarchaeological assessment as the areas of historically flooded land or lake-bed are far less likely to have archaeological potential than those parts of the Order Limits located on Aeolian sand.
------	---	---

Comments on Local Impact Reports (City of Doncaster Council)

8.27	Assumptions regarding past disturbance caused by historic drainage, warping and peat extraction are repeatedly relied upon to argue for reduced archaeological survival. However, this impact is largely asserted rather than demonstrated, and available evidence suggests that such assumptions may not always hold true. The discovery of the Lindholme Trackway, a Neolithic wooden trackway (Scheduled Monument 1443481) located approximately 1.5km south of the order limits, is instructive. This nationally important monument was identified by a member of the public where erosion had brought it close to the modern ground surface, illustrating that significant archaeological remains may survive at shallow depths despite later activity.	The impact of peat extraction is only noted in relation to prehistoric and geoarchaeological potential in three places in the Environmental Statement Appendix 8.1 Heritage Baseline Assessment [APP-085], namely once in the initial assessment, once in the summary of potential and once in the conclusion. The area of industrial peat extraction is evidenced across Land Parcel B within Order Limits although this lies within North Lincolnshire and was identified during the targeted trial trenching (Environmental Statement Appendix 8.4 Trial Trenching Report [APP-094]). This area was also highly instructive in noting that Romano-British remains identified in the 1980s were no longer extant through a combination of peat extraction and intensive farming. With regard to the Lindholme Trackway the Applicant accepts there is a possibility for significant archaeological remains to be identified as is noted in the Baseline Assessment Environmental Statement Appendix 8.1 Heritage Baseline Assessment [APP-085]. However, the Applicant suggests that given the way in which this asset was found and the shallow depth of cover, any such features would likely
------	---	---

Comments on Local Impact Reports (City of Doncaster Council)

		have been identified within the Geophysical Survey results. Archaeological investigations and mitigations are set out in Environmental Statement Appendix 8.6 Outline Archaeological Mitigation Strategy [Document Reference 6.3.8.6 Revision 2] and would be secured post-consent by Requirement 12 of the dDCO.
8.28	Substantial peat deposits are recorded by the British Geological Survey within the order limits, and, where intrusive evaluation works have taken place, such as the trial trenching in North Lincolnshire, peat deposits have been recorded in many trenches. On this basis, the assumption that archaeological deposits have been widely compromised across the site appears over generalised and insufficiently evidenced.	Peat deposits are recorded over parts of the Order Limits. However, the Applicant would highlight that more of the Order Limits lie within areas recorded as having Glaciofluvial Lake deposits, Alluvium, Sand and Warp deposits although the potential for degraded peat to be present below these superficial deposits is acknowledged. Where peat deposits were identified during the construction of Tween Bridge Wind Farm the auger survey identified the deposits at c. 1m – 2m below ground level with a Neolithic land surface below this. During the targeted trial trenching (Environmental Statement Appendix 8.4 Trial Trenching Report [APP-O94]) peat deposits were identified in a number of locations.

Comments on Local Impact Reports (City of Doncaster Council)

		The conclusions relating to trenching Area 1, within Land Parcel B noted that the underlying natural of this area was predominantly clay with areas of peat also present. In Trenches 115 and 116 a portion of the peat had clearly been truncated and was likely subject to peat extraction. Other parts of Area 1 (around Trenches 120 and 132) contained deeper peat deposits. The reason that features associated with the cropmarks targeted by trenching were not seen is unclear. However, it is possibly related to peat extraction in this Area having removed the deposits since the photographs which recorded the cropmarks were taken. The geophysical survey appears to suggest that peat extraction has taken place within Area 1 with peat deposits still extant along the southeastern edge and through the central portion. Sections of former peat extraction railway lines were also recorded by the geophysical survey (Environmental Statement Appendix 8.2 Geophysical Survey Report [APP-086 – APP-092]). Where peat deposits were found in Trenching Area 3 – the material was generally found to be disturbed and mixed with clay or silt. The sondages excavated during the trial trenching did
--	--	---

Comments on Local Impact Reports (City of Doncaster Council)

		identify some well-preserved peat deposits but these generally lay in excess of 1.5m below ground level. It is proposed that this area is preserved in situ, as detailed in Environmental Statement Appendix 8.6 Outline Archaeological Mitigation Strategy [Document Reference 6.3.8.6 Revision 2] .
8.29	On a site of this scale, where the type of archaeological remains may be uncommon, and where burial conditions may offer enhanced preservation, the meaningful integration of multiple datasets will be essential to developing a proportionate and accurate assessment of archaeological potential. The current lack of synthesis, coupled with the downplaying of potential through broad and minimally evidenced statements, undermines confidence that a realistic worst case scenario has been identified and assessed. This, in turn, risks limiting the ability of the decision maker to give appropriate weight to the potential impacts of the proposed development.	The Applicant disagrees that the assessment provided limits the ability of the decision maker to give appropriate weight to the potential impacts of the Scheme. The data collated and considered within the assessment is in accordance with the standard and guidance set out by the Chartered Institute for Archaeologists and is sufficient to determine the nature and character of the identified archaeological resource within the Order Limits and to provide the necessary data for a mitigation strategy (either by design or by record).
8.30	As set out in CDC's Relevant Representation, the Outline Archaeological Mitigation Strategy [APP-096] functions in practice as an outline evaluation and mitigation strategy, deferring key	This question has been addressed in the Applicant's response to CDC's Relevant Representation at paragraph 8.19 [APP-050] .

Comments on Local Impact Reports (City of Doncaster Council)

	elements of assessment until post consent. In order for appropriate weight to be given to the effects of the proposals on the significance of any affected heritage assets, it will be necessary for the Applicant to demonstrate that sufficient flexibility remains within the scheme design and the mitigation options to respond to archaeological discoveries made and to avoid unnecessary harm.	
8.31	Some progress has been made. Following a meeting with the applicant in March 2026; the Applicant confirmed that SYAS's comments on the Outline Archaeological Mitigation Strategy will be addressed, and SYAS looks forward to reviewing the updated document. Where preservation in situ is identified as the preferred mitigation measure in this document, provisions should also be included for appropriate monitoring, together with clearly defined procedures for remedial action should the preservation objectives not be met.	The Environmental Statement Appendix 8.6 Outline Archaeological Mitigation Strategy [Document Reference 6.3.8.6 Revision 2] has been updated to reflect this progress and has been submitted at Deadline 2.
<i>Summary</i>		
8.32	Therefore, at this stage concluded that the proposed development would have a negative impact on the historic landscape setting of	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	above ground heritage assets, and below ground archaeology within the local area contrary to the policies set out above.	
--	--	--

Table 9: Ecological and Biodiversity Net Gain

Ref	Topic Summary	Applicant's Response
Key DLP Policies • Policy 29: Ecological Networks; • Policy 30: Valuing Biodiversity and Geodiversity; • Policy 31: Local Wildlife and Geological Sites; and • Policy 32: Woodlands, Trees and Hedgerows.		
9.1	Policy 29 states that proposals will only be supported which deliver a net gain for biodiversity and protect, create, maintain and enhance the Borough's ecological networks by: A) being of an appropriate size, scale and type in relation to their location within and impact on the ecological network ; B) maintaining, strengthening and bridging gaps in existing habitat networks ;	The Scheme has been designed to maintain and enhance the ecological value within the site and in the context of the local habitats. The ecological benefits of the Scheme have been acknowledged by the Council, as confirmed in row 17.4 of this document.

Comments on Local Impact Reports (City of Doncaster Council)

	C) planting native species and creating new, or restoring existing, national and local priority habitats and/or species ; and D) working with strategic partnerships to deliver conservation projects at a landscape scale where appropriate.	
9.2	Policy 30 explains that the Borough has a range of internationally, nationally, and locally important habitats, sites and species that will be protected through the following principles: A) All proposals shall be considered in light of the mitigation hierarchy in accordance with National Policy ; B) Proposals which may harm designated Local Wildlife Sites, Local Geological Sites, Priority Habitats, Priority Species, protected species or non-designated sites or features of biodiversity interest, will only be supported where: 1. they use the DEFRA biodiversity metric to demonstrate that a proposal will deliver a minimum 10% net gain for biodiversity ; 2. they protect, restore, enhance and provide appropriate buffers around	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	wildlife and geological features and bridge gaps to link these to the wider ecological network ; 3. they produce and deliver appropriate long term management plans for local wildlife and geological sites as well as newly created or restored habitats ; 4. they can demonstrate that the need for a proposal outweighs the value of any features to be lost ; and 5. 5. If the permanent loss of a geological site is unavoidable, then provision will be made for the site to first be recorded by a suitably qualified expert. C) Proposals which may impact Special Areas of Conservation, Special Protection Areas or RAMSAR Sites will only be supported where it can be demonstrated that there will be no likely significant effects and no adverse effects on the integrity of European sites, unless there are no alternative solutions and it is justified by an "imperative reasons of overriding public interest" (IROPI) assessment under the Habitats Directives ;	
--	---	--

Comments on Local Impact Reports (City of Doncaster Council)

	D) Proposals that may either directly or indirectly negatively impact Sites of Special Scientific Interest will not normally be supported. Proposals should seek to protect and enhance Sites of Special Scientific Interest and maintain, strengthen, and bridge gaps to link them to the wider ecological network wherever possible; E) In order to ensure development does not negatively impact on nightjar populations, proposals located within 3km of Thorne and Hatfield Moors Special Protection Area, that impact habitats that nightjars may use for feeding on, will only be supported where they deliver a net gain in nightjar foraging habitat.	
9.3	Policy 31 relates to local wildlife and geological sites will be identified and designated by the Council and are shown on the Policies Map. Other sites, including those awaiting designation, which can be demonstrated to meet the selection guidelines for Local Sites, will be afforded the same level of protection.	This is noted by the Applicant and no response is required.
9.4	Policy 32 states that proposals will be supported where it can be demonstrated that woodlands, trees and hedgerows have been	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	adequately considered during the design process, so that a significant adverse impact upon public amenity or ecological interest has been avoided. There will be a presumption against development that results in the loss or deterioration of ancient woodland and/or veteran trees. Proposals will need to include: A) the submission of survey information of woodland, trees and hedgerows, as appropriate, to a recognised professional and fit for purpose standard which is able to demonstrate evaluation of these features for realistic long-term retention, and how this has positively informed the design process ; B) demonstration of how retained features are to be protected during development ; C) an adequate landscape buffer (which excludes built development and residential gardens) adjacent to existing woodlands, wildlife sites and at settlement edges ; D) sufficient provision of appropriate replacement planting where it is intended to remove trees and hedgerows ; and	
--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

	E) avoidance of the loss or deterioration of woodland.	
Key Local Issues		
<i>Nightjar Mitigation</i>		
9.5	As an important and qualifying species for the adjoining SPA particular attention should be given to this species. In the outline LEMP [APP-181] at Table 2- 1 the 1st row 2nd column it states <i>"Of particular relevance to these sites is the designation of Thorne and Hatfield Moors SPA for its breeding population of nightjar which has been identified as a principal objective of the management plan (Objective 2) "</i>	This is noted by the Applicant and a response is provided below in 9.8.
9.6	However, paragraph 3.2.1 of the Outline LEMP [APP-181] states that Objective 2 is: <i>"To provide permanent areas of arable land managed for the benefit of ground-nesting bird species such as nesting and foraging skylark and non- breeding bird species over winter and on passage specifically pink-footed geese".</i>	This is noted by the Applicant and a response is provided below in 9.8.
9.7	At 3.2.1 of the Outline LEMP [APP-181] the stated Objective 3 is:	This is noted by the Applicant and a response is provided below in 9.8.

Comments on Local Impact Reports (City of Doncaster Council)

	<i>"To provide strengthened green corridors along field boundary features, specifically for the benefit of nightjar"</i>	
9.8	CDC assumes that this is a minor error as nightjar should not be included within the ground nesting bird category associated with arable land.	The Applicant confirms that Objective 3 is with regards to foraging nightjar and the Outline Landscape and Ecological Management Plan [Document Reference 7.6 Rev 3] has been updated to confirm this.
9.9	There seems to be no substantial follow -up on any objectives linked to nightjar and as this priority qualifying species CDC would expect much more detail. Part of Table 4- 1of the Outline LEMP [APP-181] 'is shown below: [Table 4-1 of the Outline LEMP [APP-181]	The Applicant confirms that further information with regards to nightjar has been included in Table 4-1 and Section 2.3 in the Outline Landscape and Ecological Management Plan [Document Reference 7.6 Rev 3] with regards to nightjar . Additional information is also provided within Section 6 of Outline Landscape and Ecological Management Plan [Document Reference 7.6 Rev 3] .
9.10	The Biodiversity Net Gain Report (APP-O82) has no mention of nightjar nor a clear indication if any of the proposed habitats will be set out in either location or habitat type for the benefit of nightjar. The land that might be created for the benefit of nightjar would be within the areas labelled "Indicative Areas for Mitigation, Enhancement and/or Retained Agricultural Land" There should be some further detail on how and where habitat improvements will be of benefit to nightjar.	The Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 3] provides the detailed management and mitigation framework for habitat improvements that will benefit foraging nightjar, including strengthened green corridors, retained and enhanced boundary features, ditch and river corridors enhancements including species-rich grassland buffers, native hedgerow and woodland planting and species-rich grassland buffers and species-rich grassland creation .

Comments on Local Impact Reports (City of Doncaster Council)

		The Applicant confirms that the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 3] has been written in combination with the Biodiversity Net Gain Report [APP-082] and that the Biodiversity Net Gain Report [APP-082] is focused specifically on habitats and Biodiversity Net Gain, with the species specific detail provided within the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 3].
9.11	Other reports such as the PIER Ecology and Conservation at Table 7.13 Summary of Effects Mitigation and Residual Effects on the 2nd row mitigation for the "Loss of foraging habitat (nightjar)" "large areas of open permeant pasture...." is proposed which is not appropriate for nightjar which forage over: field boundaries scrub, water bodies and felled woodland, not preferentially ,open pastures. CDC appreciates that there are numerous reports and proposals within the submitted documents and not every detail may be specifically accurate, but mitigation associated with an SPA qualifying species has to be accurate.	The Applicant confirms that since the production of the Formal PEIR Ecology Chapter in March 2025, ecology reports have been updated to include additional information regarding nightjar mitigation, including detail on how field margins and ditch buffers will provide strengthened green corridors and improved opportunities for foraging nightjar. Updated information regarding nightjar is included in Table 4-1 and Section 2.3 in the Outline Landscape and Ecological Management Plan [Document Reference 7.6 Revision 3] 2. Additional information was also provided within Section 6 of Outline Landscape and Ecological Management Plan [Document Reference 7.6 Revision 2].

Comments on Local Impact Reports (City of Doncaster Council)

		In addition, further information on nightjar is provided in sections 7.5 and 7.6 of Chapter 7 Ecology and Nature Conservation [Document reference 6.2.7 Revision 3] and section 6.2 and 7.2 in the Report to Inform the Habitat Regulations Assessment [Document Reference 5.3 Revision 4] .
9.12	The survey results of 2022 are the most recent from a series of surveys dating from 2005 to 2022 as shown in Figure 1 of Appendix 7.4 Nightjar Survey Report. Document Reference: 6.3.7.4. The lack of updated survey data has been assessed by natural England and they have indicated to the applicants ecologists that no further surveys would be required. CDC considers that the applicants need to evidence this advice from Natural England.	The Applicant confirms that nightjar survey data was discussed with Natural England prior to the submission of the DCO Application, and that Natural England provided details of radio tagging surveys that should be reviewed and assessed. Natural England's response to nightjar data can be seen in Environmental Statement Appendix 7.9 Natural England Discretionary Advice Note – December 2024 [APP-084]. The Applicant confirms that this data was reviewed and assessed and is included in the Chapter 7 Ecology and Nature Conservation [Document reference 6.2.7 Revision 3] and Report to Inform the Habitat Regulations Assessment [Document Reference 5.3 Revision 4]. In addition, the Applicant notes that Natural England do not provide any comments on nightjar survey data in their Relevant Representations [RR-023] and that North Lincolnshire state in 11.11

Comments on Local Impact Reports (City of Doncaster Council)

		of their Local Impact Report from local authorities [REP1-O63] that <i>'The survey methods used and the survey effort deployed as explained in the Biodiversity and Nature Conservation chapter of the Environmental Statement are considered to be appropriate for the site in question.'</i>
9.13	The nightjar tracking studies of 2016 and 2017 as described in the Environmental Statement Appendix 7.4: Nightjar Survey Results Document Reference: 6.3.7.4 provide at Appendix 1 a number of nightjar tracking maps. The 6 maps provide some extensive information about flight activity of between 5 and 8 tagged nightjar within and outside of the designated sites. Of these tracks there are a large number within the Order Limits. Can the consulting ecologists let us know if this nightjar tracking information has been applied to any post intervention mitigation planning. CDC appreciates that there is a significant amount of information and the links between tracking points may not represent the exact direction of travel but hopefully concentrations of activity within the Order Limits have been given due consideration in the planning of nightjar mitigation.	The Applicant can confirm that the nightjar tracking data has been used to inform the mitigation measures designed for the benefit of nightjar. The tracking data provided in Environmental Statement Appendix 7.4: Nightjar Survey Results [APP-O75] detail that foraging nightjar were recorded utilising extensive land outside the Order Limits, as well as land within the Order Limits. This aligns with Natural England's statement in their Relevant Representations [RR-O23] section NE8, where they state <i>'Nightjar can travel long distances to feed'</i>. The tracking data from within the Order Limits provides numerous results associated with field boundaries and ditch corridors. The design of the Scheme has therefore considered this. All ditches are to be retained and buffered with grassland

Comments on Local Impact Reports (City of Doncaster Council)

		margins. All non-statutory designated drains through minimum 5m buffers, which will be extended to 9m for all Internal Drainage Board (IDB) watercourses. In addition a 15m grassland buffer is to be provided to Whittaker's Plantation CLWS, a minimum 3m grassland buffer to all hedgerows, and an approximate 40m grassland 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. In addition, grassland margins are proposed around the mitigation areas, providing further potential foraging habitat for nightjar. The implementation of the proposed measures will result in an increase in the availability of suitable foraging habitat for nightjar compared to the existing baseline, which is currently dominated by arable land. The provision of grassland buffers and margins throughout the Order Limits will ensure that suitable foraging habitat is distributed across the Order Limits, including within the extent of the nightjar tracking data recorded during surveys.
--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

		Further detail has been provided within the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 3] and the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 4] , a
9.14	The issue of lighting and potential impacts upon nightjar is fleetingly dealt with at section 3.3.18 of the Outline CEMP. In addition to the physical construction and location of the lighting towers there should be some consideration of the luminaries used. Guidance 1 in respect technical specification of the lighting sources that have lower impacts on crepuscular species should be followed.	Nightjar are a migratory species and are present within the United Kingdom during their breeding season between late April and May until August¹, although this can also be later and be from May to mid-August². As detailed in section 3 of the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 3], <i>'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, therefore minimising any impacts from lighting.'</i> Therefore, construction within the Order limits when nightjar are likely to be present will be during daylight hours and no construction

¹ [Nightjar Bird Facts | Caprimulgus Europaeus](#)

² [Nightjar | BTO](#)

Comments on Local Impact Reports (City of Doncaster Council)

		lighting will take place. Section 3.3.6 of the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 3] states: <i>'Works will be undertaken during daytime wherever possible, to avoid the need for lighting and to undertake works when a number of nocturnal species are least active, to minimise disturbance to their foraging and commuting activities. In winter months, it is expected that work may begin in the morning before full light and continue into the afternoon during hours of darkness. These short spells of work are not considered to require any specific mitigation or controls as nocturnal species (primarily bats) will either be hibernating or with significantly reduced activity.'</i> The lighting towers detailed in 3.3.17 of the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 3] are detailed in the same paragraph as only required during 'core working hours within winter months', which is when no nightjar would be present.
Skylark Mitigation		

Comments on Local Impact Reports (City of Doncaster Council)

9.15	The ecologists within the four south Yorkshire Planning Authorities: Doncaster, Rotherham, Sheffield and Barnsley have been discussing over several months, producing a county wide stance on the issue of skylark mitigation linked with large solar array projects. This has come about mainly because such projects can frequently be sited across boundaries and where an important priority listed species such as skylark can be significantly impacted by solar array developments, Having a consistent approach to mitigation seemed both logical and imperative. This countywide position is quickly emerging as an advice note following the approval by the four Chief Planners.	This is noted by the Applicant and no response is required.
9.16	The advice note will very probably identify the use of a metric to identify current skylark territorial use and then require all mitigation provision to also be subject to a metric and subsequently a separate 30 management plan for mitigation/compensation land for skylarks and other ground nesting birds. This has roots in the approach described in the CIEEM publication In Practice: Blithe Spirit: Are Skylarks Being Overlooked in Impact Assessment? H Fox. September 2022.	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

9.17	The outline LEMP at Table 4- 1 has a habitat type identified as 'Landscape screening'. This needs to be carefully located so as not to compromise skylark mitigation areas. The number of skylark territories (269) and the classification of ground nesting Not able Species has to be given some additional consideration and this can be done with targeting the quality of the ground-nesting birds (GNB) mitigation areas. Currently skylark breeding density has been measured as 0.19 territories/ha. The area of open land in the Order Area would be reduced through the proposed development. It would therefore seem incumbent upon developers to increase the territory/ha density of the mitigation areas. The optimal features that would combine to make areas of grassland or cereal crops functional skylark and other (GNB) should be clearly identified in the LEMP as a means of securing Objective 2. The proposed advice note will identify the approach to skylark mitigation using the metric and is set out below. However, this may be subject to some change over the next months but it does provide clear direction.	The Applicant confirms that the location of landscape screening has been carefully considered so as to not compromise skylark mitigation areas. As detailed in Section 7.8.106 of the Chapter 7 Ecology and Nature Conservation [Document Reference 6.2.7 Revision3], the skylark mitigation area calculations include 50m buffers to any boundary features. The Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 3] includes further detail on skylark mitigation provision.in in Table 4-1 and section 6, including grassland management and margin provision.
9.18	For proposed development where impacts on skylark are identified, ecology reports should include a worked version of the metric as set out within the article above to indicate the amount	The Applicant provided a response to the skylark metric within the Response to Relevant Representations [REP1-043] Point 2.

Comments on Local Impact Reports (City of Doncaster Council)

	of land required either on and/or off-site to compensate for skylark and other ground nesting bird species likely to be displaced by the proposals. Ecologists should consider the likelihood of the presence of skylark on the proposed development site prior to undertaking breeding bird surveys. This would be based on habitats present and desk study data and allow for early discussion with the developer on the potential availability of on/off -site compensation land. Such areas should then be included as part of scheduled breeding bird surveys to assess their current carrying capacity, suitability as compensation habitat and/or enhancement opportunities.	The Applicant confirms that no adopted guidance regarding skylark survey methodologies and mitigation design was available from the Local Authority areas at the time of the survey design and that relevant adopted survey methodology was completed following consultation with the local authorities in March and April 2025 as detailed in Table 7-3 included in Chapter 7 Ecology and Nature Conservation [Document Reference 6.2.7 Revision 3]. The Applicant also confirms that the mitigation design is based on available research as detailed in the Response to Relevant Representations [REP1-043] Point 2.
9.19	When providing on/off-site compensation for skylark, reference should be made to RSPB advice where land is either arable or grassland habitat (link included above). Compensation land would be open and situated 10m from field boundaries to avoid predators, such as corvids. A management plan for the agreed skylark compensation areas would be a requirement of the planning application or conditioned as part of a planning permission. The plan would set out appropriate management of the habitats for the benefit of skylark over a 30 – year period.	The Applicant confirms that compensation land has been designed to be open and situated beyond field boundaries. As detailed in Section 7.8.106 of the Chapter 7 Ecology and Nature Conservation [Document Reference 6.2.7 – Revision 3], the skylark mitigation area calculations include 50m buffers to any boundary features. In addition, the Applicant confirms that the RSPB advice regarding habitat management and skylark has also been followed as detailed in section 7.8.108 of the Chapter 7 Ecology and

Comments on Local Impact Reports (City of Doncaster Council)

		Nature Conservation [Document Reference: 6.2.7 Revision 3]. The Applicant also confirms that habitat management for the Order Limits, including land to be provided for skylark mitigation, is proposed to be managed for 40 years, as set out in Section 4.1.2 of the Outline Landscape and Ecological Management Plan [Document Reference 7.6 Revision 3]
<i>Biodiversity Net Gain –Grassland Types Under Panels</i>		
9.20	The planning ecologists of the four South Yorkshire Local Planning Authorities (Doncaster, Sheffield, Barnsley, Rotherham) now have an emerging stance on the classification of solar farm grasslands. This aligns with a wider consensus amongst ecologists who are moving away from the 'urban ecosystem (u1b6: Other developed land) classification which was problematic to impose. There is recent research from Solar UK Energy which is mentioned in 'Advice Note – Post-development habitat creation and enhancement measures on solar farm sites for the purposes of Biodiversity Net Gain (BNG)' which references the research as: "Solar UK Energy published the findings of	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	ecological monitoring surveys carried out in 2024 at 124 existing solar farm sites, representing 11% of sites across the UK. Botanical surveys were undertaken of grassland habitats on these sites with data collected from 2146 quadrats. Quadrat information was collected from different areas of the solar farms, including beneath solar panels, within the rows between solar panels, outside of the main footprint of the solar panels and in areas managed/enhanced for biodiversity. " This points in the direction of the grassland underneath the panels as being of 'low' distinctiveness rather than the medium distinctiveness. The Outline LEMP at Table 4- 1 identifies the habitat as "Grassland mixture beneath and around solar arrays" describing its Creation and Management as "To create relatively species diverse neutral grassland including tussocky grassland on field margins to benefit ground nesting and foraging birds including skylark and nightjar" This is indicated in the BNG metric where 'other neutral grassland ' in 'poor 'condition is proposed to deliver the large majority of biodiversity units (5595.56 BU) on site.	
9.21	CDC cannot see that grassland beneath the panels ever being 'relatively species diverse' as the Solar UK Energy research found: "Average	The Applicant confirms that Appendix 7.12 Biodiversity Net Gain [APP-082 is to be updated

Comments on Local Impact Reports (City of Doncaster Council)

	plant species richness recorded beneath solar panels was < 4 species and < 6 species recorded between panels, with species richness increasing at the margins and outside of the arrays and in areas where biodiversity enhancement works have been undertaken."	at Deadline 3 and will include an update to the grassland type associated with the solar panels.
9.22	CDC does not doubt that the ecologists/land managers creating the habitats around and below the solar arrays will make every effort to ensure species diverse grassland but consider s it to be unachievable even in 'poor' condition. CDC consider s that low distinctiveness grassland (modified grassland) in 'poor' condition is more realistically achievable. There is also the matter of supporting structures (ballast) other footings and cable infrastructure that can reduce under panel habitats by up to 10% and these must be identified as 'built structures'. This must be accounted for in solar farm BNG assessments.	The Applicant confirms that Appendix 7.12 Biodiversity Net Gain [APP-082] is to be updated at Deadline 3 and will include an update to the grassland condition assessments and accounts for supporting structures (ballast) other footings and cable infrastructure.
9.23	CDC considers that the species diversity of proposed on-site post intervention grassland habitats beneath the panels are not achievable. CDC consider s that there should be at least three tiers of grassland associated with the solar panels: under the panels, between the panels and in peripheral/bird mitigation areas.	The Applicant confirms that Appendix 7.12 Biodiversity Net Gain [APP-082] is to be updated at Deadline 3 and will include an update to the grassland type associated with the solar panels.
<i>BNG and Post Intervention Habitats</i>		

Comments on Local Impact Reports (City of Doncaster Council)

9.24	BNG and Post Intervention Habitats The BNG metric has been identified as having one metric error identified through Mycelia as : <i>"There are net losses of Medium distinctiveness area habitats in 1 broad habitat group, and too few gains at higher distinctiveness categories to offset these losses.</i> <i>The broad habitat group concerned is:</i> <i>• Heathland and shrub, which loses 5.97 BU, from "Heathland and shrub – Bramble scrub" (1.59 BU pre- intervention, and 0.0 BU post -intervention, so a loss of 1.59 BU), "Heathland and shrub – Mixed scrub" (4.38 BU pre- intervention, and 0.0 BU post -intervention, so a loss of 4.38 BU)"</i>	The Applicant confirms that Appendix 7.12 Biodiversity Net Gain [APP-082] is to be updated at Deadline 3 and will include an update to the metric to ensure the trading rules are met.
9.25	CDC realises that the application of BNG on this project is non- mandatory and therefore it is unclear how the regulations should be applied, however, given that the BNG assessment delivers a significant area surplus (79.82% area habitats) this discrepancy should be addressed. The Statutory BNG User Guide 3rd July 2025 states at Figure 14: <i>"This box indicates if trading rules have been met or not. If trading rules have not been</i>	The Applicant confirms that Appendix 7.12 Biodiversity Net Gain [APP-082] is to be updated at Deadline 3 and will include an update to the metric to ensure the trading rules are met.

Comments on Local Impact Reports (City of Doncaster Council)

	<i>satisfied, then a net gain in biodiversity cannot be claimed."</i>	
9.26	CDC would have liked to have seen a post – intervention habitat Features Plan in the Appendix 7.12 Biodiversity Net Gain report (Document Reference: 6.3.7.12). Although at 3.15 of the BNG report it states: <i>"Details of habitat establishment and long –term management is provided through the Outline Landscape Ecological Management Plan (LEMP) [Document Reference 7.6] which has been prepared in line with this BNG assessment."</i>	The Applicant confirms that Appendix 7.12 Biodiversity Net Gain [APP-082] is to be updated at Deadline 3 and will include a post – intervention Habitat Features Plan.
9.27	Having the post –intervention plan in the BNG report with equivalent habitat types would have been very useful in identifying habitats without the attribution of their values to breeding and non– breeding bird as they are shown in the Outline LEMP.	The Applicant confirms that Appendix 7.12 Biodiversity Net Gain [APP-082] is to be updated at Deadline 3 and will include a post – intervention Habitat Features Plan.
9.28	It is not possible to identify where the differentiation between 'other neutral grassland (61.61ha proposed) and modified grassland (59.66ha proposed) occurs in the post intervention habitat plan. At Table 4– 1 of the Outline LEMP it is described as: "Grassland mixture beneath and around solar arrays" will be created by sowing with Emorsgate E M1 General Purpose Meadow Mixture (or similar) and the	The Applicant confirms that Appendix 7.12 Biodiversity Net Gain [APP-082] is to be updated at Deadline 3 and will include a post – intervention Habitat Features Plan.

Comments on Local Impact Reports (City of Doncaster Council)

	"Grassland mixture in proposed bird mitigation areas" will be created by sowing with Emorsgate EM 1 or EM2. There are some details on management of these grassland areas but CDC feels there is a lack of clarity on the location of these different grassland types. As mentioned above, this has been done for the pre-intervention proposal area and it should be carried out for the post intervention. A more extensive consideration of grassland types is discussed below	
<i>Biodiversity Net Gain –Grassland Types Under Panels</i>		
9.29	The planning ecologists of the four South Yorkshire Local Planning Authorities (Doncaster, Sheffield, Barnsley, Rotherham) now have an emerging stance on the classification of solar farm grasslands. This aligns with a wider consensus amongst ecologists who are moving away from the 'urban ecosystem (u1b6: Other developed land) classification which was problematic to impose. There is recent research from Solar UK Energy which is mentioned in " Advice Note – Post-development habitat creation and enhancement measures on solar farm sites for the purposes of Biodiversity Net Gain (BNG) " which references the research as: "Solar UK Energy published the findings of ecological monitoring surveys carried out in	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	2024 at 124 existing solar farm sites, representing 11% of sites across the UK. Botanical surveys were undertaken of grassland habitats on these sites with data collected from 2146 quadrats. Quadrat information was collected from different areas of the solar farms, including beneath solar panels, within the rows between solar panels, outside of the main footprint of the solar panels and in areas managed/enhanced for biodiversity. " This points in the direction of the grassland underneath the panels as being of 'low' distinctiveness rather than the medium distinctiveness. The Outline LEMP at Table 4- 1 identifies the habitat as "Grassland mixture beneath and around solar arrays" describing its creation and management as "To create relatively species diverse neutral grassland including tussocky grassland on field margins to benefit ground nesting and foraging birds including skylark and nightjar" . This is indicated in the BNG metric where 'other neutral grassland ' in 'poor 'condition is proposed to deliver the large majority of biodiversity units (5595.56 BU) on site	
9.30	CDC cannot see that grassland beneath the panels ever being 'relatively species diverse' as the Solar UK Energy research found: "Average plant species richness recorded beneath solar	The Applicant notes that this text is a repetition of text at 9.21, where a response has been provided above.

Comments on Local Impact Reports (City of Doncaster Council)

	panels was < 4 species and < 6 species recorded between panels, with species richness increasing at the margins and outside of the arrays and in areas where biodiversity enhancement works have been undertaken."	
9.31	CDC does not doubt that the ecologists/land managers creating the habitats around and below the solar arrays will make every effort to ensure species diverse grassland but consider s it to be unachievable even in 'poor' condition. CDC consider s that low distinctiveness grassland (modified grassland) in 'poor' condition is more realistically achievable. There is also the matter of supporting structures (ballast) other footings and cable infrastructure that can reduce under panel habitats by up t o 10% and these must be identified as 'built structures'. If these features are present in the construction and operational phases then these must be accounted for in solar farm BNG assessments.	The Applicant notes that this text is a repetition of text at 9.22, where a response has been provided above.
9.32	CDC does consider that the species diversity of proposed on- site post intervention grassland habitats beneath the panels are not achievable. CDC consider s that there should be at least three tiers of grassland associated with the solar panels: under the panels, between the panels and in peripheral/bird mitigation areas.	The Applicant confirms that Appendix 7.12 Biodiversity Net Gain [APP-082] is to be updated at Deadline 3 and will include an update to the grassland type associated with the solar panels.

Comments on Local Impact Reports (City of Doncaster Council)

<i>BNG-Arable Land</i>		
9.33	In the Outline LEMP at Table 4- 1 pg.12 there is a row which refers to Arable management to provide a cultivated land resource “To maintain arable habitat managed for ground- nesting birds such as nesting and foraging skylark, and non-breeding birds over winter and on passage, including pink -footed geese.” and that this arable crop should be sugar beet where possible and other crops should be grown where sugar beet is not being grow, I do consider that whilst sugar beet is suitable for overwintering species, particularly geese, the extensive use of cereal crops (wheat, barley) should also be used as well as rapeseed all of which can create more variable structures for both overwintering and breeding birds. As it will be an important habitat, the approach to arable cultivation as a mitigation resource should be detailed a clear strategy which takes into account that all aspects of the complex management requirements such as the fact that sugar beet can be a demanding crop and can be unviable for a number of reasons. The proposed 40ha of arable land can provide significant resources for breeding and no- breeding birds and the agricultural management has to be clearly defined . The proposed rotational proposals for	The Applicant confirms that the arable management proposed was designed following advice from Natural England as detailed in Environmental Statement Appendix 7.9 Natural England Discretionary Advice Note - December 2024 [APP 084]. In addition, the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 3] includes further detail on the arable management proposed, principally in section 6, within Table 4-1.

Comments on Local Impact Reports (City of Doncaster Council)

	the arable land within the Order Limit is dealt with to some degree in the annotation boxes in the Non- Breeding Bird Mitigation and Breeding Bird Mitigation Plans at Figure 1 and 2 of the outline LEMP but in trying to put too much information into the annotations, the plans are largely obscured and the information within them is insufficient. It would have been better to have annotations linked to more extensive text within the LEMP that provides comprehensive proposals for arable land management and other specific mitigation measures.	
<i>Connectivity</i>		
9.34	Within the Outline LEMP there is only one reference to 'connectivity' in the paragraph 3.2.2. Not only is ecological connectivity central to Local Plan Policy and established ecological principles but it should be a major consideration at the earliest planning stages. Whilst the breeding and non- breeding bird mitigation plans in the Outline LEMP are comprehensive in the annotations and 'stand- alone' examples of mitigation there is no overall strategic connectivity plan. Such biodiversity pathways linked locationally and through complementary habitat type are not evident in the post intervention mitigation proposals.	The Applicant confirms that the Scheme has been designed to provide connectivity through the Order Limits through the retention and buffering of ditches, woodland, hedgerows and the river corridor, and the creation of new habitat creation including hedgerows. This is created as part of the strengthened green corridors and is included as part of Objective 3 in the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 3]
<i>BNG and Long Term Monitoring</i>		

Comments on Local Impact Reports (City of Doncaster Council)

9.35	Once the biodiversity net gain metric has been finalised the 'post intervention' habitats will need to be subject to a Habitat Management and Monitoring Plan (HMMP) as is the norm in the mandatory BNG process. The Outline LEMP at 6.1.4 proposes that a Suitably Qualified Ecologist (SQE) undertakes evaluation of the progress of the post intervention habitats . This approach should be amended to include a wider range of monitors. As the two LPA's that are covered by the project are experienced and in the best position structurally and geographically, the HMMP should be approved and jointly monitored by them and the SQE with the division of the monitoring fees going to the LPA's dependent upon the work involved. There is also the matter of how to legally secure the post intervention habitats through the HPPM. This is normally done through a Section 106 agreement under normal circumstances, but this will need be clarified as the project is an NSIP. CDC feels that the LPA's should have a strong monitoring role n the implementation of the HMMP and there should also be a monitoring group set up meet annually to review monitoring reports and jointly agree amendments and modifications to habitat management.	The Outline Landscape and Ecology Management Plan [Document Reference 7.6 Revision 3] is secured by Requirement 8 of Schedule 2 to the draft DCO [Document Reference 3.1 Revision 4]. The Outline Landscape and Ecology Management Plan includes relevant implementation and monitoring requirements, particularly in Table 4-1 and sections 6 and 7. The final Landscape and Ecology Management Plan must be substantially in accordance with the outline Landscape and Ecology Management Plan [Document Reference 7.6 Revision 3] and would need to be approved by the local planning authority before construction commences, and following consultation by the undertaker on that landscape and ecology management plan with the Environment Agency (in respect of its functions), Natural England (in respect of its functions) and National Highways (in respect of its functions), as secured by Requirement 8 of the draft DCO [Document Reference 3.1 Revision 4]. This provides the CDC with the appropriate control over these monitoring measures, as they will be the local planning authority for any activities within CDC's administrative area.
------	---	---

Comments on Local Impact Reports (City of Doncaster Council)

		The Applicant confirms that a section 106 agreement would not be appropriate in this instance. A DCO made under the Planning Act 2008 is not analogous to a planning permission. A DCO is fundamentally different as it is a statutory consent which confers powers directly. The draft DCO already provides clear and comprehensive statutory obligations for the monitoring of the Scheme, and it would therefore be inappropriate and unnecessary for the same monitoring to be agreed within an additional bilateral agreement. This mechanism for securing monitoring is heavily precedent and reflects standard practice for NSIPs.
9.36	It is accepted that the preparation, survey, reporting and submission of ecological documents and associated information for a utility scale ground mounted solar farm such as the Tween Bridges NSIP can extend over a number of years. This process can lead to changes in best practice, guidance and advice particularly in the creation and monitoring of land use changes linked with solar farms. CDC will reference recent developments in monitoring methods within solar farm and most specifically 'A Standardised Approach to Biodiversity Monitoring in Solar Farms - From Development to Application. Montag et al. In	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	Practice Magazine March 2026 which seems to be part of a more extensive move by ecologists to provide more comprehensive monitoring methods of solar farm -post intervention biodiversity.	
9.37	The post -intervention habitats proposed in the BNG assessment and the outline LEMP comprise significant areas of grassland. A range of monitoring methods should be brought forward to provide evidence of the success of the creation of species diverse grass land and valuable mitigation habitats .Where such large areas of currently functional habitats are being lost across important areas containing the highest status conservation sites, the monitoring of habitats should extend beyond basic botanical surveys. Monitoring of post intervention habitats and in particular grasslands, should also include frequent surveys of pollinating invertebrates: butterflies, bees, moths and other groups as a means of ensuring that the functional value of created grasslands is clearly demonstrated. Other means of identifying the functional value should be considered consider a variety of survey types including bioacoustics and fixed point photography.	The Applicant confirms that the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 3] includes further detail on monitoring, including pollinating invertebrate surveys in section 7.14.
<i>Soils</i>		

Comments on Local Impact Reports (City of Doncaster Council)

9.38	There is no mention of the analysis of soils taken out of production of crops for conversion to mainly other neutral grassland which both meets BNG condition assessment. The type of habitat beneath and between the solar panels is discussed extensively above referred to in the BNG assessment and report and within the outline LEMP. The nutrient enrichment of soils through arable cultivation can be variable and levels nitrates and phosphates being particularly relevant to the successful establishment of herb rich grasslands.	The Applicant confirms that the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 3] includes further detail on soil testing in section 7.14. .
9.39	CDC is concerned that the creation of >1600ha of other neutral grassland could be compromised by the levels of nutrients retained within the soils. The Outline LEMP at 3.2.3 mentions the cessation of intensive agriculture and associated elimination of agrochemical inputs. However, nowhere does it mention residual soil nutrients levels and that these should be analysed, appraised and dealt with according to findings which in turn can assist in the adaptive management of grassland habitats in particular. It would be helpful if the methods for creating species rich grassland on nutrient rich soils are detailed in a final LEMP.	The Applicant confirms that the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 3] includes further detail on monitoring, including pollinating invertebrate surveys in section 7.14.
<i>Cable Routes</i>		

Comments on Local Impact Reports (City of Doncaster Council)

9.40	As stated repeatedly in the document Volume 5 Grid Connection Statement 'there is uncertainty about the route of the cable to the 400kV substation as the location of the 400kV substation has not been confirmed by National Grid Electricity Transmission. It would be useful to know what form the cable route will take in terms of depth, width and other constraints. However, at paragraph 3.1.5 it states that the cable route to the 400kV substation would be separate application and this is stated as being the usual means of progressing the grid connecting cable route which can be achieved through a number of options. As the 400kV substation will be constructed as part of the Order ('Volume 5 Grid Connection Statement paragraph 1.1.6) when this is confirmed it would be logical if the works to deliver the substation and associated works were included in the whole scheme BNG assessment.	The Applicant's position regarding the grid connection is set out in the Grid Connection Statement [REP1-014] and Annex 1 of the Written Summary of Oral Submissions at the Issue Specific Hearing 1 [REP1-046] . These state that a separate consent will be sought for the 400kV cable grid connection, which would include a BNG calculation relevant to that application.
<i>Report to Inform Habitats Regulations Assessment</i>		
9.41	With reference to the Report to Inform the Habitats Regulation Assessment there are several points to be made. A Glossary would have been helpful as this document contains quite a number of acronyms, and not all of these	The Applicant confirms that section 1.13 of the Report to Inform Habitat Regulations Assessment [Document reference 5.3 Revision 4] is the summary and that the main text in this report provides the full detail of each acronym.

Comments on Local Impact Reports (City of Doncaster Council)

	are fully explained. LSE's occurs at the start in paragraph 1.13 and its full meaning 'likely significant effects' is not given.	
9.42	CDC consider s that there is too great an emphasis on the potential loss of functional habitat between the Order Limits and the Humber Estuary SPA/SAC.	The Applicant confirms that all Likely Significant Effects of all the designated sites in the zone of influence to the Order Limits are addressed and that updated detail has been provided in the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 4] .
9.43	At para 1.1.3 one of the LSE's from the construction phase is considered to be the 6.2.56 habitat degradation during operational phase. 6.2.20 can nightjar frequented areas be identified so that any construction inside of the presence period of April-August utilises these areas and well frequented areas are avoided	The Applicant can confirm that additional information on construction mitigation with regards to nightjar is included in section 6.2 and 7.2 in the Report to Inform Habitat Regulations Assessment [Document Reference 5.3 Revision 4] .
Summary		
9.44	For the reasons set out above CDC concludes that the proposed development would have a negative impact on the Ecological and Biodiversity Net Gain within the local area contrary to the policies set out above	The Applicant has responded to the points provided above and considers that measures will be implemented as detailed in the Outline Landscape Ecological Management Plan [Document Reference 7.6 Revision 3], Chapter 7 Ecology and Nature Conservation [Document Reference 6.2.7 Revision3], Outline Ecological Construction Management Plan [Document

Comments on Local Impact Reports (City of Doncaster Council)

		Reference 7.5 Revision 3], and Report to Inform Habitat Regulations Assessment [Document reference 5.3 Revision 4] to prevent negative impacts to Ecology and demonstrates that a positive Biodiversity Net Gain will be achieved.
--	--	---

Table 10: Landscape and Visual Impact

Ref	Topic Summary	Applicant's Response
Key DLP Policies • Policy 25: Development in the Countryside Area; • Policy 26: Green Infrastructure (Strategic Policy); • Policy 27: Protecting Open Space and Non Designated Open Space; • Policy 32: Woodlands, Trees and Hedgerows; • Policy 33: Landscape; • Policy 48: Landscaping of New Developments; • Policy 54: Pollution; and • Policy 58: Low Carbon and Renewable Energy.		
10.1	Policy 25 (Part 4) relates specifically to new non- residential development proposals, setting out that these will be supported in the Countryside Policy Area (which the extent of the order limits within the Doncaster areas sits)	This is noted by the Applicant and no response is required. Landscape and visual effects and their significance are set out in the Environmental Statement Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 2] .

Comments on Local Impact Reports (City of Doncaster Council)

	provided that certain specified criteria are met. Relevant to the landscape and visual issues of the proposed development is criteria D which requires that the scale and design of the proposal would not have a significant adverse impact on the landscape.	
10.2	Policy 26 relates to the protection, maintenance, enhancement and creation of green infrastructure setting out that proposals will be supported which contribute towards green infrastructure and council strategies. The green infrastructure should principally benefit the development but also connect to the wider network. A 10 point criteria states what the scheme is required to demonstrate.	This is noted by the Applicant and no response is required.
10.3	Policy 27 relates to the protection of open spaces which provide important opportunities for formal and informal recreation as well as those which provide a social, cultural and ecological role. It goes on to list a number of development principals for within these areas. A protected open space lies adjacent to the site however, the criteria is relevant for development within open spaces rather than adjacent to.	This is noted by the Applicant and no response is required.
10.4	Policy 32 relates to woodlands, trees and hedgerows, stating that proposals will be supported where it can be demonstrated that these matters have been adequately	This is noted by the Applicant and no response is required. An Arboricultural Impact Assessment was included at Environmental Statement Appendix 6.6 Arboricultural Impact

Comments on Local Impact Reports (City of Doncaster Council)

considered during the design process, so that a significant adverse impact upon public amenity or ecological interest has been avoided. There will be a presumption against development that results in the loss or deterioration of ancient woodland and/or veteran trees. Proposals will need to include: A) the submission of survey information of woodland, trees and hedgerows, as appropriate, to a recognised professional and fit for purpose standard which is able to demonstrate evaluation of these features for realistic long-term retention, and how this has positively informed the design process; B) demonstration of how retained features are to be protected during development; C) an adequate landscape buffer (which excludes built development and residential gardens) adjacent to existing woodlands, wildlife sites and at settlement edges; D) sufficient provision of appropriate replacement planting where it is intended to remove trees and hedgerows; and	Assessment [APP-070] and landscape proposals shown at Environmental Statement Figure 6.4 Landscape and Visual Mitigation Strategy [REP1-027].
---	--

Comments on Local Impact Reports (City of Doncaster Council)

	E) avoidance of the loss or deterioration of woodland.	
10.5	Policy 33 addresses landscape more specifically, setting out that proposals will be supported that take account of the quality, local distinctiveness and the sensitivity to change of distinctive landscape character areas and individual landscape features. Development will be permitted provided that it conserves, enhances and, where possible, restores: A) the landscape character and local distinctiveness of the area including its historical, biodiversity, cultural character and its tranquillity; B) the distinctive setting of, and relationship between, settlements and buildings and the landscape including important views; C) the nature conservation value of the area including the pattern of woodland, forests, trees, field boundaries, vegetation and other features; D) the special qualities of rivers, waterways, wetlands and their surroundings; and	This is noted by the Applicant and no response is required. Effects upon landscape character, landscape features and visual amenity are set out in the Environmental Statement Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 2] .

Comments on Local Impact Reports (City of Doncaster Council)

	E) the topography of the area including sensitive skylines, hillsides and geological features.	
10.5	Policy 33 addresses landscape more specifically, setting out that proposals will be supported that take account of the quality, local distinctiveness and the sensitivity to change of distinctive landscape character areas and individual landscape features. Development will be permitted provided that it conserves, enhances and, where possible, restores: A) the landscape character and local distinctiveness of the area including its historical, biodiversity, cultural character and its tranquillity; B) the distinctive setting of, and relationship between, settlements and buildings and the landscape including important views; C) the nature conservation value of the area including the pattern of woodland, forests, trees, field boundaries, vegetation and other features; D) the special qualities of rivers, waterways, wetlands and their surroundings; and	This is noted by the Applicant and no response is required. Effects upon landscape character, landscape features and visual amenity are set out in the Environmental Statement Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 2].

Comments on Local Impact Reports (City of Doncaster Council)

	E) the topography of the area including sensitive skylines, hillsides and geological features.	
10.6	Policy 33 goes on to set out that where development proposals will most likely result in a significant impact on the Borough's landscape the proposals should assess the potential impact (including cumulative impact) and propose how any negative effects will be minimised. In doing so consideration should be given to: F) alternative site selection; G) the scale, massing, design, form, layout, orientation and/ or operation of the development ; H) the incorporation of suitable mitigation measures ; or I) where suitable mitigation measures are not achievable on site, then development should provide appropriate compensation off site. Landscape works shall be appropriate to the scale of the development in accordance with Policy 48.	This is noted by the Applicant and no response is required. Landscape and visual effects and their significance are set out in the Environmental Statement Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 2]. Cumulative effects have been assessed in ES Chapter 17 Cumulative Impacts [Document reference 6.2.17 Revision 2]

Comments on Local Impact Reports (City of Doncaster Council)

10.7	Policy 48 then relates to the landscaping of new developments more specifically. This states that development will be supported which protects landscape character, protects and enhances existing landscape features, and provides a high quality, comprehensive hard and soft landscape scheme that includes: A) maximising links to wider Green Infrastructure in line with Policy 26; B) the provision of Sustainable Drainage Systems and designs that facilitate floodplain compensation and preservation of flood flow routes where appropriate; C) generous tree, shrub and hedgerow planting consisting of appropriate species and nursery stock specified for the location, role and prominence of the landscape feature, and to provide year round interest ; D) fit for purpose, attractive hard and soft landscaping including; planting, surfacing materials, boundary treatments and street furniture, for all external environments ;	This is noted by the Applicant and no response is required.
------	--	---

Comments on Local Impact Reports (City of Doncaster Council)

	E) appropriate, robust, low maintenance surfacing materials for public areas and the adoptable highway, which should include more attractive finishes (including block paving) in key focal spaces and lightly trafficked carriageways; and F) a long- term management and maintenance strategy with clear responsibilities and regimes for the upkeep of all external areas.	
10.8	Policy 54 (E) relates to the impact of artificial lighting, stating that it has the potential to cause unacceptable light pollution in the form of sky – glow, glare or intrusion onto other property and land. It sets out that development proposals should ensure that adequate and reasonable controls to protect the rural night sky are included within the proposals.	This is noted by the Applicant and no response is required.
10.9	10.9 With specific reference to landscape impacts, Policy 58(B) states that in all cases, low carbon and renewable energy proposals will be supported where they (inter alia): 2. have no unacceptable adverse effects on local amenity and air quality and include appropriate stand-off distances between	This is noted by the Applicant and no response is required. Landscape and visual effects and their significance are set out in the Environmental Statement Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3]. Cumulative effects are set out in Environmental Statement Chapter 17 Cumulative Impacts [Document Reference 6.2.17 Revision 2].

Comments on Local Impact Reports (City of Doncaster Council)

	technologies and sensitive receptors, such as residential areas; 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)	
10.10	At paragraph 165(a) of the NPPF, it is recognised that whilst providing a positive strategy for energy, it should be ensured that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts).	This is noted by the Applicant and no response is required.
Key Local Issues		
10.11	The Council has commissioned Tetra Tech to assist in the consideration of the landscape and visual impacts of the proposed development. Key local issues of concern are detailed below. They have been divided into Landscape issues, visual and residential amenity issues and design issues accordingly:	This is noted by the Applicant and no response is required.
Landscape		
10.12	The Landscape Character Assessment by the Isle of Axholme and Hatfield Chase Landscape Partnership (2014, Fiona Fyfe Associates, with Countryside and Steven Warnock) ¹² covers the area of the site within Doncaster and North Lincolnshire. This landscape character	Response provided in 9.2 Statement of Common Ground with City of Doncaster Council [REP1-050] , Table 3-7, Ref 2.

Comments on Local Impact Reports (City of Doncaster Council)

	assessment has not been referred to in the LVIA and should have been covered. It breaks down the landscape character areas into a more detailed level than the landscape character areas within the Doncaster Landscape Character Assessment and Capacity Study (2007) and is a more recent document. The landscape character areas that should have been addressed within CDC area include; 1 Thorne and Crowle Moors; 2 Hatfield Moors; 3 Hatfield Chase Levels; and 8 Thorne and Moorends. The development proposals lie within both Character Areas 1 and 3. Character Areas 2 and 8 lie within the study area.	
10.13	The Thorne and Crowle Moors Landscape Character Area (1) is described in the character assessment as 'one of the largest lowland raised bogs in Britain'. The moors are 'internationally designated for their important raised bog habitats'. It goes on to describe that 'A new form of energy production now takes place in the LCA in the form of the Tween Bridge windfarm, which is visually prominent over much of the area'. Key characteristics include 'within the Moors, the landscape has a sense of wildness, remoteness and tranquillity, but this is reduced when nearby wind turbines are visible'.	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

10.14	The Hatfield Chase Levels Landscape Character Area (3) is described in the character assessment as 'Although the general impression of the landscape is one of openness, much of it is also well -treed, due to the presence of the surrounding wooded Moors, and the influence of the wooded turbaries, shelter belts, quarry site planting and motorway planting within the LCA. The Isle of Axholme forms the eastern horizon, and its associated water towers, windmills and church towers form distinctive landmarks'. Its key characteristics include 'An important historic landscape, being a former royal hunting forest transformed through drainage by Dutch engineer Cornelius Vermuyden in the 1620s'; 'A strongly geometric landscape, dominated by big skies and with a marked sense of space' and 'Ridge- top features on the Isle of Axholme and the wind turbines at Tween Moors provide a sense of orientation'.	Response provided in 9.2 Statement of Common Ground with City of Doncaster Council [REP1-050], Table 3-7, Ref 2.
10.15	The LVIA addresses the Peat Moorlands Landscape character type and the Throne and Hatfield Peat Moorlands (G2) character area that lie within the CDC area as identified in the Doncaster Character Assessment (2007). The sensitivity of this area is assessed as high. Consideration should have been given to a sensitivity of very high considering the nature of	The Landscape Character & Capacity Assessment of Doncaster Borough [Ref 6-10] states that the G2 – Thorne and Hatfield Peat Moorlands landscape character area (LCA) 'is rated as a high quality landscape' and 'is considered to be of high value', however, does not specifically mention the sensitivity of the LCA.

Comments on Local Impact Reports (City of Doncaster Council)

	the proposals and the more detailed description of the landscape character areas (areas 1 and 3 from the 2014 character assessment).	Within paragraph 6.4.25 of Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3] , it states 'Overall, this LCA is considered to be of high value, however it is noted that this value is linked particularly to the nature conservation sites to the north and south of the Order Limits and the Area of Special Landscape Value to the north west of Thorne and the M18 with which there is no intervisibility with the Scheme. The section of the character area noted as being disturbed by major transport corridors is most reflective of the site area.'. Therefore, balancing these factors, Chapter 6 Landscape and Visual concludes that a medium sensitivity is appropriate for G2 – Thorne and Hatfield Peat Moorlands LCA.
10.16	The LVIA refers to the portion of the landscape character area covered by the development and the limited visibility of the scheme (paragraph 6.5.52) for the sole reasoning to result in a 'not significant' effect at year 1. As stated in GLVIA3 (para graph 5.48) there are a number of issues that should be covered when assessing magnitude of effect – 'size or scale, the geographical extent of the area influenced and duration and reversibility'. This should be explained in further detail.	Within paragraph 6.5.50 of Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3], significant effects are identified at year 1 and year 15 for those parts of G2 – Thorne and Hatfield Peat Moorlands LCA in which the Order Limits is located. With reference to Para 5.48 of GLVIA3, in terms of 'size or scale' by nature of being a DCO project the assessment recognises that the Scheme is a large scale proposal comprising of a series of Parcels A- E over a wide geographical area. The

Comments on Local Impact Reports (City of Doncaster Council)

		Scheme whilst large and extensive has been carefully designed to fit within the existing landscape pattern with the loss of minimal landscape elements. The landscape mitigation proposals at ES Figure 6.4: Landscape & Visual Mitigation Strategy [REP1-027] for example, include the repair of hedgerow boundaries within this existing framework. The nine key characteristics of G2 – Thorne and Hatfield Peat Moorlands LCA are set out earlier in Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3], at paragraph 6.4.24. This is noted as a large scale open flat and low-lying landscape. The large-scale nature of the landscape allows it to accommodate development of this scale. It is acknowledged that introduction of panels and associated infrastructure will have an inevitable effect on openness but the land on which the Scheme is placed will remain flat and low-lying. Thorne and Hatfield Moors lie outside the Order Limits and their related characteristics – exposed peat on the moors, empty and remote feeling on the moors and limited access on the moors would not be affected. Areas beyond the moors are identified as being mainly arable farming but the characteristics also note that turf is grown as a crop in some fields and there occasional pasture,
--	--	---

Comments on Local Impact Reports (City of Doncaster Council)

		whilst the balance of the land cover below the panels would change, this would not be at odds with existing landscape elements and characteristics. The pattern of the large geometric fields would not alter as a result of the Scheme, nor would the ditches that bound them whilst the existing occasional hedges though these would be supplemented and repaired with new planting. Scattered farmsteads surrounded by large sheds and shelterbelt trees would remain as would the built up areas at Thorne and Moorends and the intrusive motorway, straight roads, railway on an embankment and the canal cutting across the landscape beyond the moors. On balance, most of the key characteristics of G2 – Thorne and Hatfield Peat Moorlands LCA would remain with the key alteration, with the reduction in openness in some portions which has been mitigated using hedgerows, an existing landscape component. In terms of geographical extent, this has been considered at a site level and the immediate surrounds, at a district landscape character scale and at a National Character scale.
--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

		The duration and reversibility, have been addressed through the project stages of, construction, operation and decommissioning.
10.17	One consideration includes 'the degree to which aesthetic or perceptual aspects of the landscape are altered either by removal of existing components or the landscape or the addition of new one'. By year 15, the magnitude of change is assessed as reducing to low due to the addition of mitigation proposals. It is difficult to understand how such changes in a landscape character (which is described as 'has a sense of wilderness and remoteness', 'an important historic landscape' and 'big skies'), in both the short and long term, can result in a low magnitude of change (moderate to minor effect – not significant) on the landscape character.	Please identify where the character references in the statement are taken from.
10.18	Overall, the consideration of landscape character has been underplayed. The Landscape Institute's Technical Guidance Note 02/21 "Assessing landscape value outside national designations" has not been referenced. This guidance note is to provide information and guidance when making judgements about the value of a landscape outside national landscape designations. Considering the unique characteristics of the landscape character of	The consideration of landscape character has not been underplayed. At paragraph 6.5.50 of Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3], significant effects are identified at year 1 and year 15 for those parts of the LCA in which the Order Limits is located. In terms of TGN02/21 and the identification of Landscape Value it is considered on balance that whilst the landscape contains elements of value

Comments on Local Impact Reports (City of Doncaster Council)

	the site, this should have been addressed to determine whether the landscape is considered to be a valued landscape (NPFF paragraph 187). Where areas are identified as valued landscapes, this should be taken into consideration in determining the sensitivity of the landscape in the LVIA. This is in line with CDC Policy 33 on landscape issues.	it does not constitute a Valued Landscape (NPFF para 187). With reference to Box 5.1 in GLVIA3 the following summary is provided. In terms of quality and condition; the landscape of the study area is generally representative of the local character areas, though there is a distinction between the moors areas and the open Hatfield Chase levels. The land within which the Order Limits sits is generally intensively farmed and contains denuded hedgerows. In terms of scenic qualities; whilst the level ground provides wide open skies the landscape is strongly influenced by powerlines, motorways and existing turbines. In terms of rarity; this landscape is not notably rare in this portion of the country and extends beyond the study area. In terms of representativeness; the landscape contains important examples of restoring peat bogs, the remainder of the landscape is broadly representative of the wider agricultural landscape. In terms of Conservation Interests, Thorne and Hatfield Moors are important wildlife sites and the Isle of Axholme Area of Historic Landscape
--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

		Interest is located to the south east around Epworth. In terms of Recreational Value; the canal provides an important green corridor but access for recreation is generally limited and disconnected. In terms of Associations; the landscape is the product of centuries of artificial drainage and agricultural improvement including the works of the Dutch engineer Cornelius Vermuyden in the 1620's.
10.19	In addition, one of the landscape detractors within the LVIA is identified as the presence of the major road network in terms of tranquillity and remoteness (paragraph 6.4.25). It is acknowledged that some of the site parcels are located directly adjacent to major roads, however, others are more distant and are less influenced by the visual and audible presence of the strategic transport network, for example the Thorne and Crowle Moors Landscape Character Area. This is even referenced in the National character area description (NCA39) 'Despite settlements, motorways and main roads, there is still a sense of remoteness to be experienced on the Levels, in particular on Thorne and Hatfield Moors and along the Lower Derwent Valley'. The road network should not be used as a reason for	This has been dealt with under the response to row 10.15.

Comments on Local Impact Reports (City of Doncaster Council)

	influencing the sensitivity of all the character areas in the CDC area.	
10.20	With regards to the findings of the landscape assessment, there appears to some contradictory conclusions. The assessment of operational effects states that there would be no significant effects at year 1 and year 15 on local landscape character areas, rather effects would be significant on the character of the site itself. Table 6- 6 also reports no significant effects on landscape character areas. However, paragraph 6.8.10 states that there would be significant effects upon several named landscape character areas as a result of the operation of the proposed development. Clarification is required on this basis to remove contradictory conclusions and confirm if significant effects on the landscape do occur in relation to local character areas (CDC Policy 25 (Part 4) requires that the proposals would not have a significant adverse impact on the landscape).	Paragraph 6.8.10 and Table 6-6 have been updated within Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3] to set out the level of effect and significance as stated within the chapter.
10.21	The focus of the LVIA centres on the presence of the PV panels with little or no recognition of the presence of the additional infrastructure. In the Doncaster area there are two 100MW BESS and five 132KV substations proposed (of the 7 no. 132 KV substations, 4 no. BESS and one	Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3] considers all elements of the Scheme within the Order Limits, which are listed within paragraph 6.3.5 of the Chapter.

Comments on Local Impact Reports (City of Doncaster Council)

	400kv substation in total across the whole proposal). These contain large structures with some elements up to 15m in height within them. They are likely to be perceived within the wider area so should be acknowledged appropriately within the LVIA.	
10.22	The basis of the year 15 and decommissioning phase of the landscape assessment is that the embedded mitigation would have established to screen the development resulting in not - significant effects (LVIA para graph 6.5.52), but there is no acknowledgment of the long term change in underlying landscape character due to the presence of the landscape mitigation, which is largely different to the existing landscape characteristics. At decommissioning, it is understood that the site is to be returned to its original conditions (Ref. ES Chapter 2, paragraph 2.12.4). There is no acknowledgement how the proposed landscape mitigation will have matured in the 40 year time period, how it will have altered the landscape character. Paragraph 6.5.153 of the LVIA states that no hedgerows will be removed at decommissioning. The removal of the panels and other infrastructure 40 years later is likely to be a significant change to the landscape	Within the 'Doncaster Landscape Character and Capacity Assessment of Doncaster Borough (March 2007)' one of the recent landscape impacts upon Character Type G2 - Thorne and Hatfield Peat Moorlands, states that 'Loss and fragmentation of hedges has resulted from the intensification of arable farmland'. Within the 'North Lincolnshire Landscape Character Assessment 1999', one of the key characteristics of Local Landscape Type Flat Open Remote Farmland is 'Elsewhere the landscape has been subject to early and recent enclosure, but has suffered of hedgerow removal, mainly due to the intensification of agricultural practice with the result that fields lack boundary definition.'. Therefore, changes in existing landscape character upon landscapes which are acknowledged in published landscape character assessment to benefit from changes,

Comments on Local Impact Reports (City of Doncaster Council)

	character. This should be addressed in further detail in the decommissioning assessment.	notwithstanding the adverse effects brought about by the Scheme. At decommissioning stage, the Applicant expects that only limited vegetation removal would be required to facilitate the works, and does not intend to wholesale remove the planting carried out as part of the Scheme. Once decommissioned, the Order Limits would be handed back to the landowner and future use of the land would be at their discretion. The Applicant would not be involved in the ongoing management of the Order Limits. Likely landscape and visual effects at decommissioning are set out at paragraphs 6.5.163 – 6.5.164 and Table 6–5 within Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3].
10.23	Overall, due to the above statements, the landscape character assessment is considered inadequate and requires further consideration in relation to the landscape areas addressed and the impacts and effects of the development on the landscape character. It is the CDC's opinion that the effects of the development on LCAs 1	The consideration of landscape character is not inadequate, at paragraph 6.5.50 of Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3], significant effects are identified at year 1 and year 15 for those parts of the LCA in which the Order Limits is located.

Comments on Local Impact Reports (City of Doncaster Council)

	and 3 (from the 2014 character assessment) should they have been assessed as character areas, are likely to be significant. The effects on Thorne and Hatfield Peat Moorlands (G2) character area is also likely to be significant should all the relevant criteria have been considered.	
<i>Visual and Residential Amenity</i>		
10.24	The LVIA does not address each visual receptor considered to define their value and susceptibility to result in a sensitivity rating. It relies on the description provided in the LVIA methodology (Appendix 6.1 Section 1.4) which only briefly touches on value and susceptibility of visual receptors. Value and susceptibility should be clearly defined for visual receptors as described in GLVIA3.	In all cases, the sensitivity of visual receptors considers the susceptibility to changes in the receptors views and the value of these views, which are then summarised in Appendix 6.1 Landscape and Visual Impact Assessment Criteria [APP-061]. Residential and recreational receptors are considered to have a high visual sensitivity to the change proposed, where all cases they were considered to have a high susceptibility to changes in their views and that these views were of a high value. People driving along minor roads and the former line of the A18/High level banks are considered to have a medium sensitivity reflecting the medium susceptibility and value associated with their views. People using the motorway, A-roads the railway and other select roads are considered to have a low sensitivity

Comments on Local Impact Reports (City of Doncaster Council)

		reflecting the low susceptibility and value associated with the views from these routes. If there is any specific disagreement in the sensitivity ratings set out in Appendix 6.1 Landscape and Visual Impact Assessment Criteria [APP-061] and within Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3], the Applicant would be pleased to discuss further.
10.25	The LVIA provides judgements on sensitivity and magnitude of change although some of the justification given for the judgement arrived at for sensitivity and magnitude is brief in the visual assessment (Appendix 6.5). Examples include viewpoints 32 and 33 although it is acknowledged these viewpoints lie in North Lincolnshire.	This is noted by the Applicant and no response is required.
10.26	For some of the receptors, there is brief rationale provided for how the sensitivity and magnitude have been combined to arrive at the final effects. The assessment of effects in relation to residential visual amenity is also brief, sometimes limited to one sentence. There is also a lot of repetition of the same phrases used in the assessment of effects, this occurs within the viewpoint assessment at Appendix 6.5 and the RVAA at Appendix 6.2.	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

10.27	Judgements have been made for some visual receptors with regards to the year 15 and decommissioning phase assessment, and effects upon residential visual amenity, whereby the LVIA assumes that the embedded mitigation has established to screen views of the development thus overall effects are no longer significant. There is no acknowledgement of the change from a view with a wide and open aspect to one screened by a 3m high hedgerow. A shortened, screened view is still likely to result in an adverse, and potentially significant, change. An example is RVAA receptor 21 Mauds Bridge where it is felt there is an over reliance on mitigation planting resulting in the reduction of an effect. Inconsistencies with the assessment at some locations has also been noted.	It is acknowledged that introduction of panels and associated infrastructure will have an inevitable effect upon visual receptors and that adverse effects would remain in some cases, even with embedded landscape mitigation in place. In some cases this would foreshorten open views, however, the embedded mitigation would filter direct views of the Scheme. In some instances, significant effects remain with embedded landscape mitigation in place at Year 15. However, the Applicant has in some cases identified some adverse visual effects as not significant, in line with Environmental Statement Appendix 6.1 Landscape and Visual Impact Assessment Criteria [APP-061], which confirms professional judgement is used as appropriate to determine a magnitude and sensitivity of receptors and effects. . Additional hedgerows and trees are an appropriate form of landscape mitigation in providing screening for the operational elements of the Scheme (panels, fences, etc). While this will influence some open views within the landscape, the introduction of new planting into a landscape with limited landscape features due to intensification of agricultural uses is not
-------	--	--

Comments on Local Impact Reports (City of Doncaster Council)

		considered an adverse addition within the wider rural landscape context.
10.28	RVAA receptor 21 Mauds Bridge has been assessed in the RVAA with a moderate/major significant effect at year 1 and a moderate (not significant) effect at year 15. This is explained as primarily due to the mitigation planting screening some of the view of the panels. This property lies adjacent to viewpoint 5, which has been produced as a photomontage (Appendix 6.4). The Assessment tables in Appendix 6.5 for viewpoint 5, although relating to the users of the canal rather than the residential property, assesses residual effects to be major/moderate (significant). These appear to be conflicting statements as it would be anticipated that a similar level of effect is experienced by users of the residential property at the viewpoint 5 location.	The Applicant acknowledges that Mauds Bridge and Viewpoint 5 are located in proximity to one another, being approximately 130m apart. With reference to the assessment of RVAA Property 21: Mauds Bridge within Appendix 6.2: Residential Visual Amenity Assessment [APP-062] the Year 15 assessment states: 'Views towards the Scheme to the north would be filtered by the proposed woodland planting. To the south, views towards the Scheme would be filtered by proposed hedgerow planting with scattered tree planting. However, some views towards the Scheme are predicted to be possible through proposed mitigation to the south.' For Viewpoint 5 at the Operational Phase, although views would be broken up by existing field boundary vegetation, it states within Appendix 6.5 Viewpoint Assessment [APP-069] that 'solar PV modules in Land Parcels A and C would be prominent in the view by users of the towpath and boat users on the canal, to both the north and south.'

Comments on Local Impact Reports (City of Doncaster Council)

		The difference between the two assessments and hence the difference in significance relates to the limited views from Mauds Bridge property to the south, which differs from that seen along the towpath as shown at Viewpoint 5 where views are possible both to the north and south towards the Scheme.
10.29	Viewpoint 1 (representing PRoW Thorne No.15 users) in the assessment tables (Appendix 6.5) records a residual effect of moderate (non-significant). Paragraph 6.5.108 of the LVIA records a year 15 effect as major/moderate (significant). These are conflicting statements.	The Applicant acknowledges that there appears to be a difference in assessment of residual effects from Viewpoint 1 within Appendix 6.5 Viewpoint Assessment [APP-069] , when compared to the assessment of Public Right of Way FP15 (Thorne) (Ref: DR/Thorne/15) within Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3] . It is considered that the conclusions within Chapter 6 Landscape and Visual are overstated and that the assessment of Viewpoint 1 within Appendix 6.5 Viewpoint Assessment [APP-069] should take precedent as a single static viewpoint representing a gap in the vegetation along this route.
10.30	The methodology for the production of the photomontages has not been included in the LVIA methodology as expected. For a scheme of this nature CDC would expect to see the photomontage methodology provided within the documents.	The Applicant has provided this methodology [Document Reference 6.3.6.8 Revision 1]

Comments on Local Impact Reports (City of Doncaster Council)

10.31	It is understood that any proposed lighting will be sensor triggered and not continuous (LVIA para graph 6.3.5). CDC Policy 54 (E) artificial lighting states that adequate and reasonable controls should be in place to protect rural night sky.	This is noted by the Applicant and no response is required.
10.32	Due the matters raised above, the assessment of effects for the visual receptors requires further clarification in a number of areas and is considered inaccurate in its assessment of hedgerow screening removing significant effects for visual receptors currently experiencing wide open views.	This is noted by the Applicant but this is a consequential effect of this type of Scheme, the hedgerows provide an important screening component which serve to reduce visual effects and are not at odds with the landscape fabric.
<i>Landscape Design</i>		
10.33	The primary landscape mitigation measure concerns the planting of hedgerows and woodland copses/shelterbelts to visual screen the development. The LVIA discusses that the hedgerows will be planted to restore the landscape, as set out in the relevant published landscape character assessment guidelines. However, it is not clear which landscape character guidance is being referred to. The baseline character of the receiving landscape is open, with little vegetation, and this is acknowledged in published character assessments. There is also reference made to restoring historic hedgerows, but it is unclear as	The mitigation measures have been primarily guided by published landscape character assessments as set out in Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3] and best practice landscape mitigation, restoring landscape features which have been lost over time. Landscape mitigation is primarily focussed along field boundaries as shown on Environmental Statement Figure 6.4 – Landscape and Visual Mitigation Strategy [REP1-027] . Further explanation regarding the suitability of the embedded landscape mitigation is provided below.

Comments on Local Impact Reports (City of Doncaster Council)

	to where these are located. The landscape strategy requires further explanation to understand how it has been developed, the reasons behind the various proposals and how it fits into the green infrastructure (in line with CDC Policy 26 and Policy 48).	Within the 'Doncaster Landscape Character and Capacity Assessment of Doncaster Borough (March 2007)' one of the recent landscape impacts upon Character Type G2 – Thorne and Hatfield Peat Moorlands, states that 'Loss and fragmentation of hedges has resulted from the intensification of arable farmland'. This would imply that there has been a loss of hedgerows within the local area and therefore, introduction of new hedgerows within the landscape is seen as beneficial. This is further evidenced by the numerous mitigation measures for the Scheme which includes retaining, conserving and reinforcing existing hedgerows and introducing additional hedgerow planting. Within the 'North Lincolnshire Landscape Character Assessment 1999', one of the key characteristics of Local Landscape Type Flat Open Remote Farmland is 'Elsewhere the landscape has been subject to early and recent enclosure, but has suffered of hedgerow removal, mainly due to the intensification of agricultural practice with the result that fields lack boundary definition.'. The landscape guidelines for Character Type Flat Open Remote Farmland goes on to state that 'New hedgerow planting should look to reinstate historic field boundaries, in
--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

		particular zone boundaries, in areas where hedgerow removal is still in evidence.' This would indicate that the introduction of new hedgerows within this landscape would not be at odds and would be seen as beneficial. The landscape guidelines for Local Landscape Type Flat Drained Treed Farmland states that existing hedges are to be protected, enhanced and conserved, along with other landscape features. Although the Flat Drained Treed Farmland has a generally open character, the guidelines for the Local Landscape Type states 'Hedgerow planting is not a dominant structural element of this landscape, however where present should be protected and in many cases strengthened.' Therefore, in conclusion, retaining existing hedgerows and the introduction of new hedgerows is seen as a benefit both as a landscape feature and to landscape character.
10.34	In the Issue Specific Hearing on the 15th April 2026, the applicants Flood advisor mentioned that hedgerows would be maintained at a height of 3.6m. The LVIA states they will be maintained at a height of 3m (LVIA ref paragraph 6.6.4). This requires clarification as if a height of 3.6m is maintained, this may alter the assessment in the LVIA. The retention of the hedge of at either	Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3] considers that all proposed hedgerows are maintained at a height of 3m. This is substantiated within 9.3 Statement of Common Ground with North Lincolnshire Council [APP-051], Table 3-7, Ref 7, where is states:

Comments on Local Impact Reports (City of Doncaster Council)

	height should be explained in a specific landscape strategy to support the reasoning.	'At 3m the hedgerows will screen the 2m high fences and largely screen the panels particularly in close range views. The hedgerows, with an approximate 1m wide base will be well proportioned at 3m and fit with the existing landscape pattern through the Environmental Statement Landscape Strategy and Visual Mitigation Strategy [REP1-027] .
10.35	In the Issue Specific Hearing 1 (ISH1) (on 15th April 2026) the applicants Flood advisor mentioned the various ditches that are proposed as part of the flood strategy. These are not depicted on the Landscape and Visual Mitigation Strategy (Environmental Statement Figure 6.4.6.4). If additional ditches are proposed, these should be designed in conjunction with the landscape proposals and shown on Environmental Statement Figure 6.4.	The Applicant can confirm that the Scheme does not include proposals for any additional ditches as part of flood risk mitigation measures or within the Outline Surface Water Drainage Strategy detailed within ES Technical Appendix 10.1 Flood Risk Assessment Parts 1-2 [Document Reference 6.3.10.1, Revision 3] .
10.36	Hedgerows are proposed along the line of a number of the existing ditches as shown on Environmental Statement Figure 6.4 (e.g. along Moor Owners Road between parcels A9 and A11a). Hedgerows adjacent to ditches do incur additional maintenance issues due to restricted access and it should be identified how this will be addressed and if this has been considered within the design proposal.	Suitable offsets have been designed into the Scheme to allow for the continued maintenance of the ditches and the maintenance of the new hedgerows.

Comments on Local Impact Reports (City of Doncaster Council)

10.37	The graphics used on the Landscape and Visual Mitigation Strategy (Plan 6.4.6.4) are difficult to read to allow for a clear understanding of the landscape development proposals over the whole site. Although detail is provided for the canal corridor, no supporting detail is provided for the wider site and this, accompanied with difficult to read graphics, particularly in relation to hedgerow placement, results in little clear understanding of the wider landscape strategy presented.	The Applicant's position is that the Landscape and Visual Mitigation Strategy [REP1-027] is clear and legible, noting that the plans used within Appendix 6.7 Stainforth & Keedby Canal – Thorne To Crowles Corridor Study [APP-071] are extracts from the Landscape Strategy and Visual Mitigation Strategy . The Applicant would highlight the Landscape and Visual Mitigation Strategy [REP1-27] is produced at a scale of 1:1000 showing an overview plan of the Scheme, with then detailed section sheets of parts of the Scheme at a scale of 1:5000 to aid the reader. .
10.38	Neutral grassland is proposed as ecological habitat within the site. There is no detail provided on how agricultural farmland, likely heavy in nitrates and phosphates, will support a neutral grassland habitat. It is therefore questioned whether the all the ecological benefits identified as part of the proposal can actually be achieved. This requires further detail to substantiate that the benefits proposed are achievable.	Response already provided in 9.3 Statement of Common Ground with North Lincolnshire Council [REP1-051] , Table 3-7, item 7. The response states: <i>'Prior to habitat creation, soil testing will be completed to confirm the PH and nutrient levels and determining the appropriate seed mix to ensure the maximum beneficial mix for the soils and nutrients status.'</i>
10.39	There are some hedgerows within the site boundary that appear not to have been surveyed (Arboricultural Impact Assessment , Environmental Statement Appendix 6.6). As the arboricultural survey informs the landscape and visual mitigation, it is considered important to	The query over Arboricultural Survey Data has been responded to within Statement of Common Ground with North Lincolnshire [REP1-051] within Table 3-7, item 7. The response states:

Comments on Local Impact Reports (City of Doncaster Council)

	have all existing and retained vegetation adequately surveyed and conveyed on the application plans. An example can be found at what 3 words location: brisk.viewing.reframe where a stand of trees is clearly visible on recent aerial mapping but not surveyed or shown in the AIA (ES Appendix 6.6, sheet 19, p59). CDC Policy 32 requires matters relating to woodland, trees and hedgerows should be adequately considered.	<i>The Applicant notes this comment. In a few discrete areas within Development Parcel C9 (see ES Figure 1.3: Development Parcel Plan [APP-131] for location detail) arboricultural survey data has not been obtained. This related to the area shown on Sheet 25 of the Tree Survey and Constraints Plan in Appendix 6.6 Arboricultural Impact Assessment [APP-070] only. The Applicant confirms that through a desktop review of existing vegetation present in those unsurveyed locations there is no interaction with the development of the Scheme and this vegetation will remain as existing throughout the lifetime of the Scheme. The existing vegetation lies either outside of site perimeter fencing which will be erected ahead of any site activity commencing within these parcels or isolated from Scheme infrastructure components by drainage features, acting as natural root barriers. Therefore, an update to Appendix 6.6 Arboricultural Impact Assessment [APP-070] is not considered necessary or proportionate as the overall conclusions of the assessment remain the same and no impacts are anticipated in relation to this vegetation. Albeit the additional vegetation not surveyed has not been considered in the BNG metric calculations; however, the current BNG metric remains robust</i>
--	---	---

Comments on Local Impact Reports (City of Doncaster Council)

		<i>showing a worst-case scenario of existing vegetation present in the baseline as it accounts for a lesser amount of vegetation present in the existing baseline.'</i>
10.40	The landscape mitigation strategy includes for extensive hedgerow planting, woodland and copse planting, and grassland areas for wintering birds and skylark habitat. However, at decommissioning, it is stated that the landscape would be returned to pre- construction conditions (E.S. Chapter 2, page 20). Clarification should be provided as to how the farmland would sit alongside the biodiversity improvement measures associated with the development in perpetuity e.g. an outline landscape restoration plan, to inform likely long term (post decommissioning) landscape management is required. The Outline Decommissioning Environmental Management Plan (Document 7.3) doesn't provide information beyond the land being handed back to the relevant landowners, with consultation with stakeholders and landowners held regarding the management of mitigation beyond the lifespan of the scheme.	It is not intended nor required that the biodiversity measures for the Scheme would continue in perpetuity. The land used for the Scheme will be returned to the landowner and restored to the same state as when the lease is entered into. It would be for the landowner at that time to decide on the use of the land.

Comments on Local Impact Reports (City of Doncaster Council)

10.41	Further detail to be provided on the landscape design rationale to gain an understanding of the landscape proposals, their rationale, achievability, design evolution and how they will assimilate into the landscape character.	The design of the Scheme is set out within the 5.6 Design Approach Document [APP-032]. If further detail is required, this needs to be specifically agreed with the Applicant. The Applicant has undertaken an iterative design process including several design team workshops as the application has been prepared. Field boundaries and existing hedgerows have been considered a key constraint to be integrated into the Scheme. Where offsets have been included these have been responsive to the landscape pattern which is linear and blocky and therefore the resultant banks of panels are laid out to reflect this. The presence of native hedgerows along many of the key routes and wider field boundaries makes them a key component of the existing landscape and therefore a suitable part of the mitigation strategy particularly when viewed at close range.
<i>Summary</i>		
10.42	The Council concludes that the proposed development would have a negative impact on landscape character and visual amenity within the local area contrary to the policies set out above. Further details are required to demonstrate the conclusions made in the LVIA are substantiated; the landscape design	This is noted by the Applicant with specific responses provided elsewhere.

Comments on Local Impact Reports (City of Doncaster Council)

	proposals are achievable and consider a wider green infrastructure strategy; and the value of the landscape has been sufficiently considered when carrying out the assessment.	
--	--	--

Table 11: Socio-Economic Impacts and Land Use

Ref	Topic Summary	Applicant's Response
Employment Generation		
Key DLP Policies • Policy 2: Level of Growth • Policy 3: Employment Allocations		
11.1	Of particular note, Policy 3 (C) states that for employment or other developments that propose 20 or more direct jobs, the Council will seek to enter into a local labour agreement with the developer/applicant that sets out the following: 1. An agreed percentage target for local labour ; 2. A training and recruitment plan; 3. Commitment to an agreed target for the proportion of local procurement of services and supplies.	This is noted by the Applicant.
Key Local Issues		

Comments on Local Impact Reports (City of Doncaster Council)

11.2	The DLP 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.	This is noted by the Applicant. Further detail in terms of local policy context will be added to the next iteration of the Outline Supply Chain, Employment and Skills Plan (Outline SCESP) [REP1-O38].
11.3	Recognised economic weaknesses at the time of local plan adoption include the following: • Lower than average skill levels ; • Some rural areas have poor access to services and facilities ; and • Relatively high levels of unemployment and economically inactive residents	This is noted by the Applicant, and no further action is required.
11.4	Reducing unemployment and worklessness and diversification of the rural economy are seen as key economic challenges, highlighted in the DLP.	This is noted by the Applicant.
11.5	In assessing the impact of the proposed development on socio- economics, the Council has had regard to ES Chapter 12: Socio-Economics [APP-O48]. The socio-economic	This is noted by the Applicant and no further action required.

Comments on Local Impact Reports (City of Doncaster Council)

	assessment considers the effects arising from employment generation, impacts on local services and facilities, comprising local accommodation services and Gross Value Added (GVA).	
11.6	The assessment identifies that in total, the Scheme could support 231 temporary jobs within the combined area of Doncaster, North Lincolnshire, and East Riding of Yorkshire, both direct jobs onsite and indirect/induced roles in the wider economy, during the 4.5-year construction period; that during the operational phase, there will be approximately 1 visit per month to the Site by workers, so that no full time jobs will be supported specifically by the Scheme; and that the net employment figure for the decommissioning phase would be 50 jobs.	This is noted by the Applicant and no further action required.
11.7	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. An Outline Supply Chain, Employment and Skills Plan ("OSCESP") [APP-184] has been submitted with the application and the delivery of a final SCESP secured by a DCO Requirement (Requirement 18).	This is noted by the Applicant and no further action required.

Comments on Local Impact Reports (City of Doncaster Council)

11.8	CDC requested in its Relevant Representation that the Applicant should seek to engage positively with Business Doncaster to provide insight into local markets. It was made clear that through harnessing the local connections, intelligence and support networks that Business Doncaster has, ensure that the scheme achieves maximum output and added value in this respect.	The Applicant confirms engagement is underway with Business Doncaster and detailed further within City of Doncaster Statement of Common Ground (SoCG) [REP1-050] and within the Outline Supply Chain, Employment and Skills Plan (Outline SCESP) [REPV1-038].
11.9	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.	This is noted by the Applicant and no further action required.
11.10	The Applicant has, following the CDC's previous comments set out in its Relevant Representation engaged with Business Doncaster. Business Doncaster (BD) considers the current OSCEP to have contextualised the local policy position regarding employment and skills well. It has advised the Applicant that there is a strong construction sector and solar supply chain present in the local area, and to ensure that this is reflected in the baseline and context. It is keen to see this utilised and links optimised wherever possible, with a strong proportion of local spend.	This is noted by the Applicant and no further action required.

Comments on Local Impact Reports (City of Doncaster Council)

11.11	Business Doncaster can help facilitate commitments made, for example: • Point of connection between developer and Tier 1 contractor and local suppliers ; • Coordinating 'Meet the Buyer' events ; • Facilitate recruitment and 'matchmaking' from local labour market ; • Facilitate upskilling proposals ; • Facilitate local engagement / outreach programmes	This is noted by the Applicant and no further action required.
11.12	The OSCESP should include an organisational framework including roles and responsibilities, and should reference 'Advanced Doncaster' as the City of Doncaster Council department responsible for employment, skills and education.	A proposed organisational framework, including reference to Advance Doncaster, is presented in the latest iteration of the Outline Supply Chain, Employment and Skills Plan (OSCESP) [REP1-038].
11.13	Business Doncaster would also like to see commitment to early engagement, at the pre-construction stage, in terms of ensuring appropriate resources are in place and action is taken at the right time to give best chance of achieving each commitment made.	Commitment is made within the latest iteration of the Outline Supply Chain, Employment and Skills Plan (OSCESP) [REP1-038] for early engagement, during pre-commencement stage, and that regular and ongoing engagement is undertaken throughout each subsequent development phase to ensure appropriate resource is available, as required (see 'Section 5.4 Delivery' of Outline Supply Chain, Employment and Skills Plan (OSCESP) [REP1-038]).

Comments on Local Impact Reports (City of Doncaster Council)

11.14	Monitoring and evaluation reporting meetings should be provided for, including a commitment to regular frequency during the construction and decommissioning phases.	Commitment is made within the latest iteration of the Outline Supply Chain, Employment and Skills Plan (OSCESP) [REP1-038] for a monitoring and reporting mechanism through engagement with relevant organisations (see 'Section 5.4 Delivery' of Outline Supply Chain, Employment and Skills Plan (OSCESP) [REP1-038]).
<i>Summary</i>		
11.15	Overall, in the Council's view, the local impacts associated with construction employment in the construction and decommissioning phases would be neutral (albeit there would be a positive local impact during those phases which is recognised and supported, subject to the detail contained within Requirement (skills, supply chain and employment)).	This is noted by the Applicant and no further action required.
Best and Most Versatile (BMV) Agricultural Land and Soils		
Key DLP Policies		
Policy 60: Protecting and Enhancing Doncaster's Soil and Water Resources		
11.16	This sets out that proposals affecting land and water resources will be expected to comply with the following criteria: 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:	This policy is complied with. Policy 60 A) 1) and 2) are in the alternative. As noted in response to paragraph 11.22 that adequate reinstatement will bring the land back to its previous state, such that Policy 60 A) is therefore satisfied.

Comments on Local Impact Reports (City of Doncaster Council)

	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). B) Developers will need to demonstrate through an on- site assessment the actual grading where significant development takes place on agricultural land. 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.	Policy 60 B) requires an assessment of the actual grading of the agricultural land, which has been provided, this meets the policy requirement. Policy 60 C) requires demonstration that soils will be conserved and managed in a practical way, which is provided in the ES Volume 1 Chapter 15 Agricultural Circumstances [APP-052] and the Outline Soil Management Plan [Document Reference 7.3 Revision 3].
11.17	The NPPF at paragraph 187 recognises the economic and other benefits of the best and most versatile agricultural land. Footnote 65 within paragraph 188 of the NPPF requires where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. There is therefore a clear direction in national policy for solar farms to be located on brownfield and lower grades of agricultural land, which recognises the importance of balancing the need for	The policy references are noted. Similar policy is set out in the NPS EN-3 (2026). These matters are addressed in the ES Volume 1 Chapter 15 Agricultural Circumstances [APP-052].

Comments on Local Impact Reports (City of Doncaster Council)

	sustainable energy whilst ensuring BMV is available for food production.	
Key Local Issues		
11.18	CDC offered detailed comments on the assessment of the impacts on soils and agricultural land was provided in the Council's Relevant Representation [RR- 006], and this is not repeated here.	These comments are responded to in response to the Relevant Representations [REP1-043].
11.19	CDC expressed its disappointment that its previous advice to the Applicant at the PEIR stage had not been addressed. CDC reiterates its comments that 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, and in particular the consideration of excluding some areas from development.	These comments are responded to in the response to Relevant Representations [REP1-043]. In addition, the Applicant is preparing a "BMV Micro Siting" analysis to be submitted at Deadline 3 which reviews the considerations given to the placing of items of equipment involving soil disturbance within the overall layout.
11.20	As set out in its Relevant Representation [RR-006], 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	This section of text in the Relevant Representation [RR-006] is paragraph 11.31. The Response to Relevant Representations [REP1-043] has responded to this point within the section sub headed 'Compaction'. It states "The potential for compaction from these works is recognised, <i>although the potential for downgrading of ALC grade due to compaction is limited.</i> " The Outline Soil Management Plan Document Reference 7.8 Revision 3 sets out in sections 6.4 and

Comments on Local Impact Reports (City of Doncaster Council)

	sub-stations (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.	6.5 in outline terms, how these areas will be restored in the decommissioning phase of the Scheme.
11.21	The Council does acknowledge that the overall loss of Best and Most Versatile agricultural soils within the context of the wider site is not deemed to be 'significant' as per the requirements of DLP Policy 60 due to the overall percentage loss of BMV as detailed previously in the Council's Relevant Representation [RR-006]. It is further acknowledged, however, that the ExA will need to weigh the harm arising from this minor loss against the public benefits of the proposed development.	This is noted by the Applicant and no response is required.
11.22	It is also accepted that the development would meet the requirements of Policy 60(A)(2) insofar that the loss of agricultural land would be for a temporary period, and the land can be reinstated back to its previous state following decommissioning.	This is noted by the Applicant and no response is required.
<i>Summary</i>		
11.23	The Council does however consider that during the lifetime of the development, there would be a negative effect on agricultural land, albeit this would be neutral longer term, once decommissioning had taken place, in accordance with DLP Policy 60.	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

Key DLP Policies		
• 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		
11.17	Policy 18 states as follows: A) Where new developments affect public rights of way, the public right of way should be retained and wherever possible be on the legally recorded alignment. Where a public right of way is affected the development should be designed to accommodate the route following the principles outlined in Policy 19 ; B) Where development leads to the diversion of an existing right of way, a suitable alternative must be established, following the principles outlined in Policies 19 and 20; C) Development will not normally be allowed to lead to the closure of a public right of way unless a suitable replacement can be established; D) Developers will be expected to consider any unrecorded public paths that cross development sites and treat them in the same way as definitive public rights of way ;	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	E) Proposals will be supported that enhance the Trans Pennine Trail, particularly those that create off -road sections for all users.	
11.18	Policy 19 sets out the requirements that development proposals will be expected to meet in terms of access, design and layout, as follows: A) Developers will be expected to incorporate the principles of least restrictive access in the design and layout of public rights of way as part of the development; B) Wherever possible, any existing or alternative route alignments through development sites should run through open, landscaped areas and should: 1. avoid the use of estate roads; 2. avoid alignments enclosed by fencing with little or no surveillance from adjacent buildings; 3. be free from sharp bends which could provide blind spots and hiding places; 4. be suitably surfaced to a specification agreed with highway authority; and	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	5. be free from barriers. Barriers should be considered as a last resort and will only be authorised where there is clear justification. Agreed structures will need to be the least restrictive and conform to the British Standard for Gaps Gates and Stiles. C) Where paths are not enclosed, minimum widths of 2 metres for footpath and 4 metres for bridleway and restricted byways should be provided. If it is necessary for the path to be enclosed by fencing, hedging or buildings, then minimum widths of 3 metres for footpaths, 5 metres for bridleways and 6 metres for restricted byways should be provided; D) Any new routes or altered alignments through development should link into the surrounding public rights of way network or adopted highway network to maintain and improve connectivity and ease of movement; and E) New routes should have formal status and be recorded on the appropriate legal record. This will secure the long-term protection of the route and formalise responsibility for maintenance.	
--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

11.19	Policy 20 requires that new development proposals that are expected to give rise to significant increase in the use of public rights of way where they cross roads, railway lines, canals and rivers must show that all safety and accessibility considerations have been taken into account to ensure use of the crossing can be maintained.	This is noted by the Applicant and no response is required.
11.20	Where necessary, existing structures (for example bridges or underpass) should be assessed, and improvements made to meet the requirements of any projected increase in use of the public rights of way network.	This is noted by the Applicant and no response is required.
11.21	Lengthy diversions of a public right of way, as an alternative to either a bridge or underpass, will not be supported. Diversion of a public right of way may be considered as a last resort but only where it does not detract from its use and enjoyment.	This is noted by the Applicant and no response is required.
11.22	Where necessary, new crossing points should be provided across new roads, railway lines and waterways where there is a need to provide safe convenient access and to maintain connectivity.	This is noted by the Applicant and no response is required.
Key Local Issues		
11.23	There are several PROW located within the Order limits and the immediate vicinity. The PROW which pass through or border the Order limits are presented in Table 12- 9 of the	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	Transport and Access chapter [APP -049]. Two of these PROW, Thorne 15 and Thorne 19 are located within the Doncaster area.	
11.24	There is further reference in the Landscape and Visual chapter [APP-043] to PROW located within or close to the scheme These are also shown on figure 3.1 Environmental Designations Plan [APP-140]. In addition to Thorne 15 and 19, Thorne 12, Hatfield 39, 40 and 41 are within Doncaster. All of these PROW are public footpaths.	This is noted by the Applicant and no response is required.
11.25	Section 6.6 of the CTMP [APP-182] outlines the mitigation and management procedures to be put in place where PROWs pass through the scheme. The measures include: (a) The use of banksmen to control both the movements on PROW and HGV traffic, with users of PROW always having priority; (b) Fencing alongside PROW where they cross the scheme with gated sections in the vicinity of the internal access tracks for vehicles to cross; (c) Installing signage at either end of affected PROW warning users of ongoing construction activities, with further signage positioned on the	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	approach to either side of crossing points for both construction traffic and PROW users.	
11.26	It is noted that it may be necessary to temporarily divert sections of Thorne 19 during the construction period in order to segregate the public from construction traffic. Thorne 19 has a recorded width of 30 feet (9 metres). It is suggested that a closure may not be necessary as the path could be fenced off in such a way as to create a segregated pedestrian route with dedicated crossing points for vehicles where necessary.	This comment is noted and the updated Outline CTMP [Document 7.7 Revision 2] refers to Thorne 19 remaining open during the construction phase.
11.27	If this is agreed then both the draft DCO [AS-003] and Street Works, Access and Public Rights of Way Plan [APP-010] will need amending.	Schedule 6 of the Draft DCO [Document Reference 3.1 Revision 4] in respect of Footpath Thorne 19 has been updated DCO . The Street Works, Access and Public Rights of Way Plan [REP1-003] will be updated at Deadline 3.
11.28	It is further noted in section 6.8 that pre-commencement walk over condition survey on the local highway network will be carried out to assess the baseline condition of the adopted highway network before relevant construction activities commence. Public Rights of Way are highways; any survey should also include the affected Public Rights of Way.	This comment is noted and the addition of PROW to the condition surveys is set out in the updated Outline CTMP [Document 7.7 Revision 2] .
11.29	In addition, it should be noted that the Landscape and Visual chapter [APP- 043] refers to Humberhead Peatlands National Nature	The common access land to the north of the Order Limits is Thorne Moors. It was found during fieldwork that there is very limited visibility from

Comments on Local Impact Reports (City of Doncaster Council)

	Reserve containing Open Access land. Nearly all of Thorne Moors is designated Open Access land and borders the site as shown on Figure 3.1 Environmental Designations Plan [AAP -140]. The public have a right to walk freely over open access land. The right of access is on foot (or by wheelchair) for open- air recreation including walking, running, climbing, picnicking and bird watching. The solar farm could be viewed by the public from anywhere along the boundary between the Access Land and land parcel A of the solar farm site and it is not clear if this has fully been taken into account.	within the moors beyond the very outer perimeters due to intervening woodland and scrub vegetation on the south- western and eastern edges. On this basis, the common land was scoped out of the assessment in Environmental Statement Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3] . Instead, representative viewpoints have been chosen from nearby from footpaths within open areas adjacent to the Thorne Moors which have outward visibility towards the Scheme (notably Viewpoints 2, 4 and 21).
11.30	The proposed permissive path shown on Figure 6.4: Landscape and visual mitigation Strategy [APP-148] commencing at the end of footpath No.19 Thorne would be a welcome addition to the recreational path network for the duration of the Solar Farm; however, the council would prefer that it connects directly into Thorne Moor rather than loop around as currently shown.	The Applicant can confirm that the possibility of connecting to Thorne Moors via the permissive path has been discussed previously with Natural England. An email exchange in October 2024 with Julian Small (Natural England Manager of Thorne Moors National Nature Reserve) confirms that <i>"We (Natural England) have considered the proposal for a permissive path onto the southern end of the Moors. We don't feel that we have the resources to manage an additional access point into the southern part of Thorne Moors, especially since much of the existing network of paths in that area is become waterlogged due to our peatland restoration activities. Ten years of more ago I think we would have been quite keen on this,</i>

Comments on Local Impact Reports (City of Doncaster Council)

		<i>but it's an opportunity that we will decline now – but thank you for thinking about it as a proposal".</i>
11.31	Thorne Moors can be accessed from Doncaster via Public Footpath No.14 Thorne and via the permissive footpath at the end of Footpath No.15 Thorne. It is an action in CDCs Rights of Way Improvement Plan (ROWIP) to work with landowners to improve access to Thorne and Hatfield Moors and this is seen an ideal opportunity to improve access to Thorne moor making it accessible from the surrounding public rights of way network.	See above.
<i>Summary</i>		
11.32	Provided that these issues are full addressed, CDC is satisfied that there will be no conflict with DLP Policies 18 and 19 in these respect. Whilst it is inevitable that users of PRoW will experience effects to varying degrees primarily during construction, and subsequently through operation and decommissioning of the Scheme, these impacts are to be mitigated through the measures outlined in the various documents albeit some of the measures such as the proposed hedgerow planting will take at least 15 years to become effective.	This is noted by the Applicant and no response is required.
11.33	Subject to the above matters being fully addressed, primarily through the detailed	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	provisions contained within the DCO, there is considered to be an overall neutral impact.	
--	---	--

Table 12: Transport and Access

Ref	Topic Summary	Applicant's Response
Key DLP Policies • Policy 12: Strategic Transport Network; and • Policy 13: Promoting Sustainable Transport in New Developments.		
12.1	Policy 12 states that developments which generate large volumes of freight traffic or involve the transport of bulk materials should be located close to the strategic transport network, where this can be accommodated within the existing capacity of the network. The network capacity will need to be established through the submission of a Transport Assessment (TA). Routing agreements will be required where deemed appropriate.	This has been addressed in the Applicant's response to CDC's Relevant Representation [REP1-043] at Section 10 (page 32). As the impacts of the Scheme are primarily focussed on the construction phase, an Outline Construction Traffic Management Plan (oCTMP) [Document 7.7 Revision 2] and a Transport Statement have been prepared which set out the forecast traffic volumes. It is concluded that there will be no material effects as a result of the Scheme.

Comments on Local Impact Reports (City of Doncaster Council)

12.2	Policy 13 sets out the requirements that proposals are required to meet in respect of promoting sustainable modes of transport to protect the highway network from residual vehicular impact.	The majority of the Site, being rural in nature, is not close to any public transport. However, as set out in the Outline CTMP [Document 7.7 Revision 2] , construction workers will be transported to the site via minibus and car sharing.
Key Local Issues		
12.3	The Council 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.	The ES Chapter 12 Transport and Access [APP-049] confirms that during the operational phase of the development, any transport and access effects would be negligible and not significant.
12.4	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. Additionally, it is anticipated that there will be a number Abnormal Indivisible Loads (AIL), albeit it is stated that these will be required on an infrequent basis. Such deliveries it is stated will be planned with an AIL route assessment, which will be secured as a Requirement of the DCO. CDC notes that as yet no such Requirement included in the draft DCO. Before any approvals	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 DCO [Document Reference 3.1 Revision 4] , which will be substantially in accordance with the Outline Construction Traffic Management Plan [Document 7.7 Revision 2] . This contains commitments to follow all statutory regulations and guidelines as appropriate in relation to construction and traffic movement activities. Deliveries requiring AIL will be planned with an AIL

Comments on Local Impact Reports (City of Doncaster Council)

	are given on routes for AIL, the haulier will need to survey potential routes with an officer from the Council's abnormal loads team to determine suitability, any issues with existing street furniture and if any would need to be removed etc.	route assessment in conjunction with the highway authorities and the Police.
12.5	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.	This is noted by the Applicant and no response is required.
12.6	CDC has reviewed the Environmental Statement Chapter 12 Transport and Access [APP-049], Environmental Statement Appendix 12.1 Transport Statement [APP -111], Environmental Statement Appendix 12.2 Summary of Sensitive Receptors [APP-112], Environmental Statement Appendix 12.3 Baseline Traffic Survey Report [APP-114] and the Outline Construction Traffic Management Plan [APP-182] and has engaged with the Applicant to discuss its suitability.	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

12.7	The Applicant has been made aware that it is Council Policy is 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 Requirements of the Draft DCO [AS-003].	This has been addressed in the Applicant's response to CDC's Relevant Representation at Section 10 (page 32) [REP1-043] . The SoCG provides further updates on this matter [APP-050] .
12.8	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 work must be undertaken to minimise disruption to the network. Again, the Council expects the requirements of the Permit Scheme Document16 be enshrined within the DCO itself to ensure the effective ongoing management of the highway network during the construction phase of the development.	This has been addressed in the Applicant's response to CDC's Relevant Representation at Section 10 (page 32) [APP-041] . The SoCG provides further updates on this matter [APP-050] .
12.9	In support of this approach, CDC has directed the Applicant's attention to the final DCO agreed between the parties in respect of the Fenwick Solar Farm17 which sets these provisions out. The firm expectation of the	This has been addressed in the Applicant's response to CDC's Relevant Representation at Section 10 (page 32) [APP-041] . The SoCG provides further updates on this matter [APP-050] .

Comments on Local Impact Reports (City of Doncaster Council)

	Council is that these provisions will be replicated in the Draft DCO in this case.	
12.10	CDC has engaged with the Applicant and will continue to do so and has been moving forward with proposed amendments to the initial text in the draft DCO on a number of highway related issues, to include: • Utilisation of a template that mirrors the conditions of a Section 278 of the Highways Act 1980 agreements to licence a developer to carry out improvement works on public highway for all proposed site access points; • Ensuring that the DCO includes a Permit to Work Scheme, so that the Council can undertake its statutory duty to co- ordinate and manage works on its highway network ; and • Ensuring all site access points are subject to a formal Safety Audit, prior to use	This has been addressed in the Applicant's response to CDC's Relevant Representation at Section 10 (page 32) [APP-041] . The SoCG provides further updates on this matter [APP-050] .
12.11	Careful regard has been had to the Outline Construction Traffic Management Plan (OCTMP) [APP-182], and the Proposed Scheme Access Arrangements included within the Plan. CDC is continuing engagement with the Applicant with regard to the routing of vehicles to specific site access points and highlighting restricted access routes and recommends that the internal access roads into the sites are formed of a paved surface for a suitable distance back such	An updated Outline CTMP [Document Reference 7.7 Revision 2] has been prepared and submitted at Deadline 2. This covers specific site access and routing matters, including surfacing.

Comments on Local Impact Reports (City of Doncaster Council)

	that the likelihood of loose material being deposited in the highway is minimised.	
<i>Summary</i>		
12.12	Accordingly, in relation to Transport and Access, subject to the above matters being fully addressed through the detailed provisions contained within the DCO, are considered to have a neutral impact overall.	No response required.

Table 13: Flood Risk and Surface Water Drainage

Ref	Topic Summary	Applicant's Response
Key DLP Policies • Policy 60 Protecting and Enhancing Doncaster's Soil and Water Resources • Policy 13: Promoting Sustainable Transport in New Developments		
13.1	Policy 60 states that proposals affecting land and water resources will be expected to comply with the following criteria: 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: 1. there are no other suitable alternative locations on lower quality agricultural land (or non- agricultural land)	. The Applicant confirms that the Scheme is compliant with Polic 60 (A-E). ES Chapter 3 [Document 3.1.3 Revision 2] in sections 3.3 and 3.4 discuss the iterative design process of Site Selection that has taken place. This Scheme is also temporary in nature and the land within the Order Limits will return to agricultural activities once the operational life of the solar farm has expired. This is outlined in the outline

Comments on Local Impact Reports (City of Doncaster Council)

	available; or 2. the land can be reinstated back to its previous state (where possible); B) Developers will need to demonstrate through an on-site assessment the actual grading where significant development takes place on agricultural land; 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; 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; E) Proposals will be supported which will: 1. make positive progress towards achieving 'good' status or potential under the Water Framework Directive in the Borough's surface and ground waterbodies; and 2. promote water efficiency measures which take account of current water availability (e.g. informed by Catchment	Decommissioning Management Plan [Document Reference 7.3 Revision 3]. The soil resource will be protected during construction via the Outline Soil Management Plan [Document Reference 7.8 Revision3]. Any construction within the areas of the Order Limits defined as having a medium sensitivity to the presence of peat will be subject to a Phase 2 ground investigation assessment pre-commencement of construction to mitigate through design any risk to ecological connectivity, carbon stores or flood risk. This Phase 2 assessment is a Requirement of the DCO via the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 3]. The Applicant has submitted Appendix 15.1 Agricultural Land Classification [APP-120] which is a semi detailed on site assessment for ALC grading within the Order Limits. The Applicant confirms that the Scheme is compliant with Policy 60 (F) and will not be have an adverse impact on the ecological status or recreational value of rivers and other water bodies, such as flood storage areas. There are no rivers or flood storage areas within the Order Limits. The River Torne is located adjacent to the
--	---	---

Comments on Local Impact Reports (City of Doncaster Council)

	Abstraction Management Strategies) and future demand; and F) Proposals will not be supported which would: 1. have an adverse impact on the ecological status or recreational value of rivers and other water bodies such as flood storage areas; 2. lead to the deterioration in the quality of surface and ground waters; and 3. lead to a reduction in ground water levels (or reduced flows in water courses).	southeast boundary of the Order Limits and is to be buffered with neutral grassland that is approximately 40m wide from any solar arrays which will prevent impacts from occurring, as detailed in section 7.5.178 of the ES Chapter 7: Ecology and Nature Conservation [Document Reference 6.2.7 Revision 3]. In addition, protective measures are detailed in sections 3.3.14 to 3.3.15 of the Outline Ecological Construction Management Plan [Document Reference 7.5 Revision 3] to prevent impacts from run-off ensuring impacts will be prevented during construction.
Key Local Issues		
13.2	The Council has continued to engage with the applicant on matters relating to flood risk and drainage and, in principle, considers the current proposals to be compliant with national standards and local guidance.	This is noted by the Applicant and no response is required.
13.3	Since the submission of the Relevant Representation, the Council has raised queries regarding whether a 10 metre easement alongside existing watercourses is sufficient to safeguard long- term access and maintenance. As the proposals progress, it is anticipated that	The Applicant notes the Council's comments and ongoing engagement will continue with the City of Doncaster Council regarding access and maintenance requirements alongside existing watercourses. Further information will be provided, where required, regarding the type of machinery anticipated to be used for access and

Comments on Local Impact Reports (City of Doncaster Council)

	further detail will be provided to enable full consideration of this matter.	maintenance purposes to demonstrate that sufficient easement widths are available
13.4	The Council also seeks clarification on whether the submitted proposals present opportunities to deliver betterment to the local watercourse network. This could include the removal of redundant culverted sections to facilitate the re-naturalisation of watercourses where feasible.	The Applicant notes the Council's comments regarding opportunities for betterment within the local watercourse network but considers that, subject to ongoing discussion with the Council, its proposals necessarily address the requirements of the Scheme, rather than wider betterment.
13.5	The Council considers the robust consideration and securing of adoption and long-term maintenance arrangements for all drainage infrastructure to be fundamental to ensuring the development's effective management and performance over its lifetime.	The Applicant does not propose to adopt the existing drainage infrastructure. The Scheme has been designed to avoid interference with the operation of drainage within and close to the Order Limits. The Applicant does not consider it necessary for the proposed drainage infrastructure to be adopted by the Local Authority.
13.6	CDC confirms as stated in its comments during ISH1, that in its capacity as Lead Local Flood Authority (LLFA), it is content in principle with the proposals submitted. The LLFA is currently working with the applicant's drainage consultants to develop the Statement of Common Ground, with the aim of identifying and	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	resolving matters requiring further discussion, which the LLFA considers to be achievable.	
<i>Summary</i>		
13.7	In summary, the LLFA noted four points that were put forward for further consideration. CDC has agreed in principle to consider these agreed, subject to further information on easement proposals. Accordingly, in relation to Flood Risk and Surface Water Drainage subject to the above matters being fully addressed it is considered that the development would have neutral impact overall.	This is noted by the Applicant and no response is required.

Table 14: Amenity Impacts – Noise and Vibration and Air Quality

Ref	Topic Summary	Applicant's Response
Key DLP Policies Policy 54: Pollution		
14.1	Policy 54 sets out that development proposals that are likely to cause pollution, or be exposed to pollution, will only be permitted where it can be demonstrated that pollution can be avoided, or where mitigation measures (such as those incorporated into the design and layout of development) will minimise significantly harmful	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	impacts to acceptable levels that protect health, environmental quality and amenity.	
14.2	CDC has reviewed the Environmental Statement Chapter 13 Noise and Vibration [APP-050] and Environmental Statement Chapter 14 Air Quality & Greenhouse Gases [APP-051] Environmental Statement Appendix 13.1 Baseline Noise Survey [APP-114], Environmental Statement Appendix 14.4 Construction Dust Assessment Procedure [APP-118] and Environmental Statement Appendix 14.5 Construction Mitigation [APP-119] and will provide further comments at Deadline 2.	This is noted by the Applicant and no response is required.
14.3	The appropriate methodologies, and standards have been used to measure the existing background noise, calculate the cumulative effects of the equipment when operational and model the resultant noise contours to show the impact on the nearest noise sensitive premises et c. During the operational phase there should be very little impact as the noise level is substantially (in most instances) well below the existing background level and therefore will not be noticed by residents.	This is noted by the Applicant and no response is required.
14.4	The CEMP is currently a ' how to guide' , giving the general best practices and procedures for managing the noise, dust, light, and vibration during the construction phase, but until the detailed assessments are provide d for each	The calculations presented in ES Chapter 13 Noise and Vibration [Document Reference 6.2.13 Revision 2] demonstrate that, noise and vibration impacts during the construction phase would not exceed the LOAEL at any of the

Comments on Local Impact Reports (City of Doncaster Council)

	phase of the development, it is not possible to accurately assess the impact of, for example the moling operations in specific locations.	receptors considered. The Applicant does not accept that it is not possible to accurately assess the impact of specific activities in specific locations, as the Applicant has adopted a reasonable worst case approach to assessment across all environmental topics and this is reflected in the conclusions set out in the Environmental Statement. Detailed management plans will need to be developed in accordance with the Requirements of the draft DCO [Document Reference 3.1 Revision 4]. This includes a detailed Construction Environmental Management Plan. These management plans will be developed to align with detailed design and phasing considerations, at the post-consent stage, and will need to be submitted to the relevant planning authority for approval, following consultation with relevant stakeholders. This approach is consistent with DCO drafting precedent and practice.
14.5	The points previously raised with the Applicant regarding the communication between CDC Environmental Health and Planning teams and the developer has been covered but again not in detail, It is understood that there will be a	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	community liaison officer, but because no principal contractor has yet been appointed, there is no named point of contact. There is nevertheless a hierarchy of responsibility for aspects of the control of Environmental Pollution laid out.	
14.6	The decommissioning phase will most likely be the construction phase in reverse, but with far less impact as it is unlikely that underground cables would be removed, therefore mitigation would be the same as in the CEMP.	This is noted by the Applicant and no response is required.
14.7	CDC is still considering the air quality impacts of the development and whether there would be more prescriptive requirements in relation to PM10s than the nuisance regime and what measures are likely to be required to mitigate any likelihood of nuisance arising.	As set out in Table 14-1 of ES Chapter 14 Air Quality and Greenhouse Gases [Document Reference 6.2.14 Revision 2] , the approach to the air quality assessment, including assessing the impacts of construction dust (PM ₁₀), was agreed with the Senior Pollution Control Officer. Notwithstanding, Table 14-14 of ES Chapter 14 Air Quality and Greenhouse Gases [Document Reference 6.2.14 Revision 2] , demonstrates that the risk of impacts during the construction phase, without mitigation, was considered to be 'High'. As such, mitigation measures commensurate with this level of risk were determined and presented in ES Appendix 14.5 Construction Mitigation [APP-119] . These measures are also included in the Outline CEMP [Document Reference 7.1 Revision 3] and are secured by DCO requirement.

Comments on Local Impact Reports (City of Doncaster Council)

		It should also be noted that Section 14.6 of ES Chapter 14 Air Quality and Greenhouse Gases [Document Reference 6.2.14 Revision 2] acknowledges that the judgement of risk is likely to be conservative given the likely phasing of work across the Order Limits. Guidance published by the Institute of Air Quality Management is clear that, with appropriate mitigation in place, the effects of construction dust (PM₁₀) will be 'not significant'.
14.8	A check on existing private water supplies in the area will be required in relation to the siting of construction compounds, fuel storage and moling operations.	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 DCO [Document Reference 3.1 Revision 4]. The Applicant is keen to undertake further consultation with City of Doncaster Council to reach an agreement.
14.9	At this stage it is accepted that Requirement 17 (operational noise) of the DCO is intended to address operational noise and on this basis, subject to adequate mitigation, the requirements of Policy 54 would be met.	This is noted by the Applicant and no response is required.
14.10	In the Council's view the local impacts associated with noise and vibration and air quality, is that there is not yet adequate information to determine that the development would not have negative impact overall.	As stated in response to paragraph 14.7, above, guidance from the Institute of Air Quality Management states that there will be no significant effect from construction dust, so long as appropriate mitigation is identified and applied. Measures commensurate with the level

Comments on Local Impact Reports (City of Doncaster Council)

		of risk are set out in ES Appendix 14.5 Construction Mitigation [Document Reference APP-119] and in the Outline CEMP [Document Reference 7.1 Revision 3] and are secured by DCO requirement.
--	--	--

Table 15: Glint and Glare

Ref	Topic Summary	Applicant's Response
Key DLP Policies		
Policy 58: Low Carbon and Renewable Energy		
15.1	Policy 58(B) 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.	This is noted by the Applicant and no response is required.
15.2	Since adoption of the DLP, the Doncaster Sheffield Airport has closed. Since then, reopening the airport has been a key strategic priority for the Council and continues to be, with a plan for passenger flights to resume in 2026 18. As such, throughout the process to date the Council has requested that the baseline for all relevant assessments within the ES is with the	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	airport as fully operational, and this has been taken forward.	
15.3	Glint and Glare is addressed in Environmental Statement Chapter 16: Other Environmental Topics [APP-O53] and 6.3.16.1 Environmental Statement Appendix 16.1 Glint and Glare Assessment (Fixed and Tracker Design) [APP-122] and Environmental Statement Appendix 16.2 Glint and Glare Assessment (Fixed Design) [APP-123].	This is noted by the Applicant and no response is required.
15.4	The assessments identify that no Significant impacts are not predicted on aviation activity at Doncaster Sheffield Airport. It concludes that solar reflections towards the Air Traffic Control (ATC) Tower are unlikely to be geometrically possible based on the location of the receptor relative to the Scheme (considering distance, height, and orientation) and that 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 it concludes 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	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	best practice for licensed airfields. And, any solar reflections geometrically possible towards aircraft on the final two -mile approach towards runway 02 are predicted to have glare intensities no greater than 'low potential for temporary after -image' and therefore it can be reliably determined that this level of glare is acceptable for these receptors. Technical modelling is not recommended.	
15.5	The assessment concludes that overall, no significant effects are predicted on aviation receptors for either layout option.	This is noted by the Applicant and no response is required.
<i>Summary</i>		
15.6	Overall, in the Council's view the local impacts associated with glint and glare would be neutral and in compliance with Policy 58.	This is noted by the Applicant and no response is required.

Table 16: Draft Development Consent Order

Ref	Topic Summary	Applicant's Response
16.1	CDC has reviewed and is continuing to review the Draft DCO [AS-003]. Topic based comments are set out below. In addition, Appendix 2 to this document includes a table of additional comments. At the time of writing,	This is noted by the Applicant. The Applicant's responses to the topic based comments are set out below.

Comments on Local Impact Reports (City of Doncaster Council)

	discussions between the parties on the detailed wording of the draft DCO are continuing.	
<i>Cultural Heritage – Archaeology</i>		
16.2	There should be an overarching archaeological mitigation strategy for the site that sets the general scope of the work and the parameters for the phase specific WSIs. The outline mitigation strategy [APP-O96] submitted as part of the ES substantially forms this and it could be finalised post –consent once more details, for example about the grid connection, are available. However, the DCO wording only secures the submission, approval and implementation of a written scheme of investigation for each phase of the development. Drawing on the wording of the approved Fenwick DCO, I would suggest that the wording in Schedule 2 Part 1 12(1– 3) be altered to include reference to a final mitigation strategy as well: 1) No phase of the authorised development may commence, and no part of the permitted preliminary works for that phase may commence, until the final Archaeological Mitigation Strategy and written scheme of investigation for that phase has been submitted to and approved by the relevant planning	The Applicant has submitted an Outline Archaeological Mitigation Strategy [Document Reference 6.3.8.6 Revision 2]. Requirement 12 of the draft DCO [Document Reference 3.1 (Rev 4)] secures a staged programme of archaeological investigation and reporting, appropriate to the importance and significance of the archaeological remains within the Order Limits. Under Requirement 12, the Applicant must submit a Written Scheme of Investigation (“WSI”) for approval by the relevant planning authority prior to the commencement of any phase of the authorised development. In accordance with Requirement 12(3), the scope of works under each WSI must be substantially in accordance with the outline Archaeological Mitigation Strategy. Requirement 12 therefore ensures that appropriate archaeological mitigation, tailored to

Comments on Local Impact Reports (City of Doncaster Council)

	authority or both relevant planning authorities (as applicable) ; 2) The final Archaeological Mitigation Strategy and any written scheme of investigation for each phase submitted under paragraph (1) must be substantially in accordance with the outline archaeological mitigation strategy. 3) The scope of works detailed in the final Archaeological Mitigation Strategy and any written scheme of investigation for each phase must be implemented as approved.	each phase of development, is secured and implemented at each stage of the authorised development. This approach allows mitigation measures to be refined as further information becomes available, while remaining substantially in accordance with the outline strategy. In the Applicant's view, Requirement 12 provides a robust and flexible framework for archaeological mitigation. It is not clear what additional benefit would be delivered by requiring submission of a final Archaeological Mitigation Strategy, over and above the existing requirement for approved WSIs that must substantially accord with the outline strategy. The Applicant therefore does not therefore consider that any amendment to Requirement 12 is necessary.
16.3	No amendments to paragraph 4 are required.	This is noted by the Applicant and no response is required.
<i>Ecological and Biodiversity Net Gain</i>		
16.4	Ecology considerations are fairly concisely dealt with in Requirement 8 Landscape and Ecology Management Plan. This references the outline Landscape Ecological Management Plan and the outline Ecological Construction Management	The Applicant does not consider that ecology considerations are dealt with "concisely" in Requirement 8 of the draft DCO [Document Reference 3.1 Revision 4] .

Comments on Local Impact Reports (City of Doncaster Council)

	Plan which will have significant elements in respect of protected species legislation and method statements relating to protected species and statutory sites. The outline Landscape and Ecological Management Plan will provide the details of the BNG post development arrangements and the development phases. Although the total BNG metric calculation indicates a 79% increase in area biodiversity values it will be important that to show how the different phases will deliver exactly the area, linear and watercourse surpluses indicated in the BNG metric. Additionally as mentioned in the Ecological and Biodiversity Net Gain section above, whilst the trading rules have been broken and the metric is showing a surplus in net gain. The DEFRA BNG user guide (July 2025) clearly states at page.69 "Figure 14 This box indicates if trading rules have been met or not. If trading rules have not been satisfied, then a net gain in biodiversity cannot be claimed. The trading rules are not influenced by the spatial risk multiplier and are applied before any spatial risk multiplier deductions."	Requirement 8 provides that no stage of the authorised development may commence until a written landscape and ecology management plan (LEMP) for that stage has been submitted to and approved by the relevant planning authority. This ensures that landscape and ecological matters are secured and approved prior to the commencement of each phase of the development. Requirement 8(2) further specifies that each LEMP must be substantially in accordance with the Outline Landscape Ecological Management Plan [Document Reference 7.6 (Revision 3)], the Outline Construction Management Plan [Document Reference 7.1 Revision 3], and the Landscape and Visual Mitigation Strategy [REP1-027]. Detailed requirements as to the content of each LEMP are set out in Requirement 8(3). Taken together, these provisions secure the delivery of landscape and ecology mitigation and enhancement measures at each stage of the authorised development. In the Applicant's view, it is therefore unclear what additional wording would be required within Requirement 8 to ensure that landscape and
--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

		ecology considerations are appropriately and effectively secured. In relation to the need for each LEMP for each phase to deliver the area, linear and watercourse surpluses indicated in the biodiversity net gain (BNG) metric, the Applicant notes that Requirement 8(3)(a) expressly requires that the LEMP for each relevant phase must include details of "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". This ensures that BNG delivery is addressed for each phase. Regarding the BNG trading rules, the Applicant confirms that Appendix 7.12 Biodiversity Net Gain [APP-O82] is to be updated at Deadline 3 and will include an update to the metric to ensure the trading rules are met.
16.5	There will have to be some resolution to the breach of trading rules.	This is noted by the Applicant, please refer to the Applicants responses at 9.24 and 16.4 above.

Comments on Local Impact Reports (City of Doncaster Council)

Table 17: Conclusions

Ref	Topic Summary	Applicant's Response
17.1	This LIR has considered the potential impacts of the Tween Bridge Solar Farm NSIP at the local level in respect of the City of Doncaster administrative area, within which the whole development will be located. It has considered positive, negative and neutral impacts, within the context of its knowledge and understanding of the area.	The Applicant corrects CDC that the scheme is located in both City of Doncaster administrative area and North Lincolnshire Council administrative area. The administrative boundaries with the Order Limits are shown in the Figure 1.1 of the Environmental Statement [APP-162].
17.2	While it is noted that the delivery of renewable energy of this nature is in accordance with key strategic policies of the Doncaster Local Plan, offering in principle support for such development, this is subject to a number of detailed considerations regarding the impacts of the proposed development.	This is noted by the Applicant and no response is required.
17.3	The ExA will need to be satisfied that any residual impacts arising from the proposed development can be outweighed by the public benefits brought about by the proposed development.	This is noted by the Applicant as no response required
17.4	Of the matters that fall within the Council's jurisdiction positive local impacts have been identified in terms of:	This is noted by the Applicant. The Applicant has responded to reference 17.6 below contesting the Council's positive that socio-economic benefits are neutral. The Applicant's position is that this

Comments on Local Impact Reports (City of Doncaster Council)

	• Contribution to the production of renewable energy in the Borough; • Ecological benefits and biodiversity net gain arising from the development (subject to ongoing engagement between the Council and Applicant on the detailed content of the Outline Landscape Ecological Management Plan (OLEMP) [APP-181].	should be recognised as a positive local impact arising from the scheme.
17.5	Of the matters that fall within the Council's jurisdiction, CDC has identified some potential negative local impacts, which can be summarised as follows: • The scale and significance of the impact on the landscape and visual amenity of the area; • It cannot as yet be concluded that the proposed development would not have a negative impact on the historic landscape, setting of above ground heritage assets, and below ground archaeology; • Loss of a small proportion of best and most versatile agricultural land for the lifetime of the development, albeit this would be neutral longer term, once decommissioning has taken place.	The Applicant notes these comments and acknowledges that some negative impacts on landscape arising from the scheme, as detailed in the ES Chapter 6 Landscape and Visual [Document Reference 6.2.6 Revision 3]. The Applicant explained at Issue Specific Hearing 1 (ISH1) the methodology for the potential impacts on heritage, including the setting of above ground heritage assets and below ground archaeology. This has been reiterated under item 4c in the Applicant's Written Summary of Oral Submissions made at Issue Specific Hearing 1 [REP1-044]. The Applicant has also updated the Planning Statement Appendix A: Policy Compliance Document [Document Reference 5.5.1 Revision 2] at Deadline 2 include an explanation of the Scheme's compliance with the policy test in paragraph 5.9.32 of NPS EN-1.

Comments on Local Impact Reports (City of Doncaster Council)

		The Applicant also referred to Table 8-2 of ES Chapter 8 [APP-045] at ISH1, which records the engagement during scoping on the approach to assessing setting. The Applicant confirmed that the agreed approach was subsequently implemented in the ES. The Applicant notes the Council's position on agricultural land.
17.6	Of the matters that fall within the Council's jurisdiction the following neutral local impacts have been identified, subject to appropriate mitigation where necessary, and are listed below: • The impacts associated with construction workforce spending and construction supply chain effects. • The impacts associated with construction employment, albeit these would be positive at a local level in the short term. • The impacts arising from noise and vibration effects.	The Applicant notes the Council's position regarding impacts arising from noise and vibration effects, the transport and access arrangements, and the glint & glare. Regarding socio-economic impacts, the Applicant would also like to draw the Council's attention to ES Chapter 18 Summary [Document Reference 6.2.18 Revision 2], paragraph 18.3.6, which identifies, in terms of socio-economic residual construction effects, significant beneficial effects are expected through increase in local employment from the construction phase of the Scheme, and in turn increase in economic output to the local economy. This also applies for the decommissioning phase.

Comments on Local Impact Reports (City of Doncaster Council)

	• The impacts associated with glint and glare effects (also subject to ongoing monitoring where necessary). • The impacts on transport and access arrangements on the local highway network • The impacts on the local network of public rights of way.	Furthermore, during the operational phases, a significant beneficial effect is anticipated on the increased business rates revenue as an important economic contributor to the area [Document Reference 6.2.18 Revision 2]. Regarding the public rights of way, the scheme will result in some benefit by introducing a permissive path within the scheme, allowing pedestrian access on land not previously allowed, in addition to maintaining all existing public rights of way.
--	---	--

3 Applicant's Response to City of Doncaster Council Local Impact Report

Appendix 1 – Additional Comments on Cultural Heritage

Table 1: Amended Scheme

Ref	Topic Summary	Applicant's Response
1.1	The proposed project involves the construction, operation (including maintenance) and decommissioning of Tween Bridge Soar Farm, a solar photovoltaic (PV) array electricity	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	generating facility with a generating capacity of 800megawatts (MW), Battery Energy Storage System (BESS) with a storage capacity of 400MW and associated infrastructure. The scheme is a Nationally Significant Infrastructure Project (NSIP) as it includes infrastructure capable of generating more than 50 MW.	
1.2	The proposed scheme as shown in the application is somewhat different from an earlier proposal which was smaller in content and by implication would probably have had a much-reduced impact on the local environment which is a historic area with a special local distinctive character evident in the landscape. Some understanding as to why the scheme has changed to affect a larger area of this special landscape is warranted. Also, since the proposed scheme appears to have advanced to the application stage reasonably quickly, after the abandonment of earlier proposals, it appears entirely reasonable to ask the applicant to give some indication of certainty that the description above accurately represents the full extent of the proposed scheme. CDC is mindful that the point of connection into the National Grid has yet to be determined and until this detail is known there could be some changes	The Site selection process and design evolution is detailed in Environmental Statement Chapter 3: Site Description, Site Selection and Iterative Design Process [Document Reference 6.1.3 Revision 2] .

Comments on Local Impact Reports (City of Doncaster Council)

	that may be required to the detail which forms the application.	
--	---	--

Table 2: Photomontages

Ref	Topic Summary	Applicant's Response
2.1	The proposed scheme relates to approximately 1,832 hectare an (4,527acres) of land situated to the East of Thorne located within the administrative area of the City of and to the west of Crowle in the administrative area of North Lincolnshire Council.	This is noted by the Applicant and no response is required.
2.2	The main elements of the proposed scheme include, ground- mounted solar PV generating station and associated mounting structures.	This is noted by the Applicant and no response is required.
2.3	It would be beneficial to have before and after photomontages showing views across selected landscapes particularly over land which is in productive agriculture. This would help members of the public to understand the impact of the proposals on the area of local distinctiveness.	Photomontage visualisations are provided at Environmental Statement Appendix 6.4 Photomontage Visualisations [Document Reference 6.3.6.4 (Part 2) Revision 2 and APP-068] .

Comments on Local Impact Reports (City of Doncaster Council)

Table 3: On-site supporting equipment including inverters, transformers and switchgear

Ref	Topic Summary	Applicant's Response
3.1	Further detail is required to indicate whether the supporting equipment is attached or added to the ground mounted panels. Ideally plans to show a row of panels and where the supporting equipment specified will be located in relation	Further details are provided in the drawings in Indicative Layout and Cross Section Plans (Rev 1) [APP-015] .

Table 4: Extent of the proposed scheme

Ref	Topic Summary	Applicant's Response
4.1	The applications states that a BESS including batteries and associated enclosures, monitoring systems, air conditioning, electric cable and fire safety infrastructure. The Bess is indicatively split into four separate 100MW compounds Each 100MW compound would be located next to and connected to one of the seven on-site 132KV substations. This question follows on from point 1 above that there is question over the degree of certainty the applicants can provide regarding the extent of the proposed scheme as described above. The Chief Executive of the	The battery storage capacity on the site is defined by the grid connection agreement and commercial viability and is considered appropriate for a PV facility of the generating output proposed. It is for the grid operator to determine how to balance generation and demand on the national grid.

Comments on Local Impact Reports (City of Doncaster Council)

	National Energy System Operator (NESO) has been widely reported as issuing warnings that the amount of solar energy entering the National Grid could cause overloading to the Grid particularly when solar production is at its height and demand is low. In layman terms there is potential for solar generated energy to go to waste if there is insufficient battery capacity to store excess electricity which cannot be accommodated within the National Grid. One possible way to possibly resolve the problem presumably would be to increase the battery storage capacity within the proposed scheme. Therefore it appears logical in order to provide an optimum level of operation and electric generation, the applicant would either have to reduce the capacity of the solar farm (i.e. have fewer solar panels generating electricity) or increase the battery storage capacity by possibly having a 100MW compound at each of the 7 on – site substations and or increase the compound capacity above 100MW.	
--	--	--

Table 5: Plans and Drawings

Comments on Local Impact Reports (City of Doncaster Council)

Ref	Topic Summary	Applicant's Response
5.1	It would be helpful to have elevation, plan and sectional drawings showing a typical 100MW BESS compound layout as proposed together with typical dimensions of features and buildings.	Final drawings do not presently exist however, further details are provided in the drawings in Indicative Layout and Cross Section Plans (Rev 1) [APP-015] and in line with the Design Approach Document [APP-032] and Appendix A: Parameters Document [APP-033] the Scheme has deliberately avoided being explicit on certain elements of the design given the rapid pace of technological advances so as to ensure the Scheme as built will include the latest and best technologies. The Design Approach Document [APP-032] and Appendix A: Parameters Document [APP-033] detail information pertinent to the consideration of impacts that may arise from the Scheme.
5.2	Drawings are also required showing the location of the Battery Storage compounds sited next to the 132KV Substations as composite plan with elevations. It is not known whether the seven on-site 132KV substations are fixed irrespective of where the point of connection to the National Grid and some clarification on this point would be appreciated.	Please see the response for 5.1 above.

Comments on Local Impact Reports (City of Doncaster Council)

Table 6: On-site supporting equipment including inverters, transformers and switchgear

Ref	Topic Summary	Applicant's Response
6.1	The application refers to Low voltage and 33KV interconnecting cabling to connect and transmit electricity from the solar PV modules and BESS to one of the seven on- site 132KV Substations.	This is noted by the Applicant and no response is required.
6.2	These are presumably overhead cables, but it is difficult to see how these will be arranged across the site, and how they are supported (including method of ground fixing and height of the cables going across the site. Further details and drawings would be helpful.	The Design Approach Document [APP-032] and Appendix A: Parameters Document [APP-033] detail information pertinent to the consideration of impacts that may arise from the Scheme. The documents above detail the parameters relating to the below-ground installation of these cables.

Table 7: RWE on-site 400KV Substation

Ref	Topic Summary	Applicant's Response
7.1	Indicative elevations and plan drawings would assist in helping to understand the project. Presumably to minimise cost, the location of the	Please see response regarding drawings in relation to 5.1, above as well as 5.8 Grid Connection Statement [APP-035] and Annex 1

Comments on Local Impact Reports (City of Doncaster Council)

	400KV substation is tied to a position which is close to the connection point to the National Grid. If this is the case, there is some uncertainty about the location of the 400KV Substation.	within 8.5 Written Summary of Oral Submissions at the Issue Specific Hearing 1 [REP1-046]
--	--	--

Table 8: Underground 132KV interconnecting cabling to connect the seven on-site 132KV substations to RWE on-site 400KV Substation

Ref	Topic Summary	Applicant's Response
8.1	If the location of the 400KV Substation is to any extent related to the connection point to the National Grid this could result in some variation to the routing of the underground cables from the 132LV Substations to the RWE on - site 400KV substation. Possibly the location of the 132KV substations is open to some amendment because the National Grid connection and therefore some confirmation of the situation is required from the applicant.	The Applicant has noted throughout the application process that cable routes will only be confirmed at detailed design. With the above in mind the assessment provided in Environmental Statement Chapter 8 Cultural Heritage and Archaeology [Document Reference 6.2.8 Revision 2] has considered a worst-case scenario where cables have been excavated across all land parcels identified for possible cabling which is clearly a far greater extent of impact than will actually occur.

Table 9: Underground 400KV interconnecting cabling from the RWE on-site 400KV substation to edge of Order Limits

Comments on Local Impact Reports (City of Doncaster Council)

Ref	Topic Summary	Applicant's Response
9.1	It is not certain whether this element of the proposed scheme implies that the point of connection to the National Grid lies outside the Order limits of the proposed scheme. The term 'cabling' is ambiguous and could relate to and facilitate other potential developments on nearby sites providing a connection to the 400KV Substation and then onto a connection with the National Grid wherever that may be. Some clarity is required to ensure that any cabling to the edge of the scheme limits is purely intended to connect to the Nation Grid if it is indeed located outside the scheme limits and cabling is intended to refer to a singular interconnection. Clearly if the intention is to connect to peripheral schemes or extended areas there would be a need to look at a greater extent of impact on a larger area having regard to cumulative impacts.	It is unclear whether this comment relates to the 400kv on-site substation that will be delivered by the Applicant or whether it relates to the separate NGET 400kv substation that will be delivered by National Grid. The 400kV cable within the Order Limits would only be used for the transmission of electricity to the Point of Connection

Table 10: Associated Infrastructure

Ref	Topic Summary	Applicant's Response
-----	---------------	----------------------

Comments on Local Impact Reports (City of Doncaster Council)

9.1	The associated infrastructure includes access tracks, parking, CCTV, gates and fencing, lighting, drainage infrastructure, storage containers, earthworks, culverts, surface water management, maintenance and welfare facilities, security cabins and other works identified as necessary to enable the development.	This is noted by the Applicant and no response is required.
9.2	For the purposes of assessing the landscape and heritage impacts of the development further detail about these infrastructure elements is essential particularly in relation to cabins and containers and where they are proposed to be sited as some control will need to be exercised otherwise the applicant will have carte blanche the ability to site these anywhere within the order site and the cumulative impact of provision when taken with other compounds for Sub stations and BESS provision will impact on the landscape and heritage assets. The provision of lighting will impact on the landscape quality and historic environment. Is it intended that only certain parts of the proposed development will have artificial lighting or potentially the whole proposed development will have the capability of being illuminated and if so what levels of intensity are envisaged. Artificial light intrusion is an important	The Design Approach Document [APP-032] and Appendix A: Parameters Document [APP-033] detail information pertinent to the consideration of impacts that may arise from the Scheme. The documents above detail the parameters relating to the associated infrastructure mentioned in the comment. The Applicant disagrees with the assertion that it might otherwise have carte blanche as the Scheme would be delivered in accordance with the Requirements set out in the draft DCO [Document Reference 3.2 Revision 4]. In particular, Requirement 6 of the draft DCO sets out that no phase of the authorised development may commence until detailed design has been submitted and approved in writing by the relevant planning authority. Any detailed design submitted to the relevant planning authority must

Comments on Local Impact Reports (City of Doncaster Council)

	consideration for parts of the historic landscape which are characterised by openness and wide skies. Whilst dark skies at night is not wholly relevant there is nevertheless some characteristics associated with the enjoyment of the landscape associated with limited artificial light intrusion in conjunction with wide skies which could be harmed in a post scheme world.	accord with Appendix A: Parameters Document [APP-033] .
9.3	Regarding drainage it is not clear whether alterations and additions associated with the proposed scheme will be compatible with the drainage provisions which have developed over the past 250 years serving this distinctive landscape which has given rise to a highly efficient land use. More detail is required.	The drainage of the Order Limits has been assessed in detail in Environmental Statement Chapter 10 Water Resource [APP-047] and Environmental Statement Appendix 10.1 Flood Risk Assessment [Document Reference 6.3.10.1 Revision 3] .

Table 11: Associated Infrastructure

Ref	Topic Summary	Applicant's Response
9.4	The application refers to; the use of Horizontal Directional Drilling for selected cable works where trenching or culvert is not possible or appropriate including canal railway and the M180; highways works to facilitate access for	This is noted by the Applicant and no response is required.

Comments on Local Impact Reports (City of Doncaster Council)

	construction vehicles, comprising passing places where necessary to ensure that Heavy Goods Vehicles can be safely accommodated amongst existing traffic, new or improved site accesses and visibility splays ; and environmental mitigation and enhancement measures, including landscaping, habitat management and biodiversity enhancement .	
9.5	It is unclear what is meant by 'environment mitigation and enhancement measures to include landscaping' within the context of the special character associated with the distinctive area affected by the proposed scheme .Improvements or mitigation works to limit the impact of visual intrusion of the detail of the proposed development to include plant machinery compounds etc could be construed as contributing to harm to the character of the affected land as compared with the 'pre' or 'no scheme world'. It is important to note that the character of the affected area is one of flat landscape, openness and wide skies. Mitigation works as proposed to shield elements of the development described above to include introducing alien features to the historic landscape are likely to add to harm rather than to mitigate. Linked to the comments made in points 1 and 4 above an appropriate method of	The key points in this comment have been previously addressed in the Applicant's response to CDC's Relevant Representation [REP1-O41] at paragraphs 8.5, 8.10 and 8.11. The mitigation proposed is detailed on 6.4.6.4 Environmental Statement Figure 6.4 Landscape and Visual Mitigation Strategy [APP-148]. The mitigation proposed is deemed to be appropriate in heritage terms as it restores the hedged character of the landscape that prevailed for much of the post-medieval period. This is evidenced through the terms of the various Inclosure Awards issued in the late 18th and early 19th centuries in relation to the land within the Order Limits which mandated fields were to be enclosed by both ditches and hedges and which were not removed as features within the

Comments on Local Impact Reports (City of Doncaster Council)

	mitigating the level of harm would be to reduce the scale of the proposed scheme to include the number of solar panels and associated plant and machinery. This obviously assumes that public benefits demonstrably outweigh the costs associated with the disbenefits of a proposed scheme for solar farm development. Having regard to these considerations the applicants should be asked to consider the most suitable mitigation measure to reduce the level of harm to the historic environment would be to reduce the scale of the proposed scheme rather than to add to the level of harm by providing inappropriate mitigation works within the context of the special distinctive landscape character of the affected area.	landscape until the mid-20th century and the increased mechanisation of farming.
--	--	--

4 Applicant's response to the City of Doncaster Council's comments on the draft Tween Bridge Solar Farm Order

Ref	Provision	City of Doncaster Council Comment	Applicant's Response
1	The fourth recital to the draft Order states – "The Secretary of State has considered the report and recommendation of the Examining Authority, has taken into account the environmental information in accordance with regulation 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(b) and has had regard to the documents and matters referred to in <u>section 105(2)(c)</u> of the 2008 Act". [Emphasis added].	CDC considers the reference to "section 105(2)(c) of the 2008 Act" should be replaced with "section 104(2)(c) of the 2008 Act". The application is being determined in accordance with section 104 of the Planning Act 2008 (not section 105) because solar photovoltaic energy generation falls within the current relevant Energy National Policy Statements (i.e. NPS EN-1, NPS EN-3 and NPS EN-5).	The Applicant has corrected this reference in the draft Development Consent Order submitted at Deadline 2 [Document Reference 3.2 Revision 4].
2	In article 2(1) (interpretation) the definition of "commence" excludes "permitted preliminary works".	CDC would be grateful for more information on the proposed extent of these works, which is not	The Applicant carefully considered the definition of "permitted preliminary works" when drafting the provision and it includes activities that are de

Comments on Local Impact Reports (City of Doncaster Council)

		clear from Explanatory Memorandum ("EM") [APP-017]. For example, these works include "site clearance (including vegetation removal and demolition of existing buildings and structures)". Unconstrained vegetation removal would be unpalatable to CDC. Likewise, CDC would welcome confirmation of which "existing buildings and structures" within their administrative area are earmarked for demolition. Furthermore, it is not clear from the draft DCO how the applicant proposes these works should be controlled and CDC would also welcome confirmation on this point.	<i>minimis</i> or small scale which would give rise to minor environmental impacts. The drafting has been included to ensure that there is a proportionate degree of flexibility available to the Applicant, since without that flexibility the carrying out of each of the activities comprised within the definition of "permitted preliminary works" would be sufficient to require the submission of detailed plans for approval under Schedule 2 to draft Development Consent Order [Document Reference 3.2 Revision 4]. 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 would ensure that all permitted preliminary works are carried out in accordance with the principles set out in the outline management plans, such as the
--	--	--	---

Comments on Local Impact Reports (City of Doncaster Council)

			Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 3] and notes that a failure to do so would create a risk of objection and/or delay at the formal discharge stage. Both the concept of “pre-commencement works” and the scope of activities within the definition are very widely precededented in solar (and non-solar) DCO drafting.
3	Article 8 (consent to transfer benefit of Order) provides for the transfer of any of or all benefits of the provisions of the Order.	Since CDC is responsible for discharging requirements and determining other consents in its administrative area it is important CDC is aware of any transfer of benefit of the Order. Owing to this, CDC considers article 8 should include a new paragraph which requires the undertaker to notify the relevant planning authority of any transfer under article 8. CDC proposes article 8 is amended as follows –	The Applicant has added a notification provision for the relevant planning authority at article 8(8) of the draft Development Consent Order submitted at Deadline 2 [Document Reference 3.2 Revision 4]. The Applicant has adopted the same drafting as that included in the Fenwick Solar Farm Order 2026, cited by CDC.

Comments on Local Impact Reports (City of Doncaster Council)

		<u>"The undertaker must provide the relevant planning authority with a copy of –</u> (a)<u>any decision by the Secretary of State to approve a transfer or grant under paragraph (3)</u> <u>or</u> (b)<u>any notification of a transfer or grant issued under paragraph (4)</u> <u>as soon as reasonably practicable after such decision is made or notification issued".</u> Similar provisions are included in the following recent DCOs – • Gatwick Airport (Northern Runway Project) Development Consent Order 2025 (SI 2025/1054)	
--	--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

		article 8(5) (consent to transfer benefit of Order), • National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958) article 7(5) (consent to transfer benefit of Order), • Sunnica Energy Farm Order 2024 (SI 2024/802) article 32(9) (consent to transfer the benefit of the Order). Importantly for CDC, a similar provision is also included in article 36(8) of the Fenwick Solar Farm Order 2026 (SI 2026/151) and CDC considers consistency in the administrative arrangements of the DCOs which will affect its area would be helpful.	
4	Article 11(1) (street works) states – “The undertaker may, for the purposes of the authorised development, enter on so much of	The drafting of Part 3 (streets) is a cause of concern for CDC owing to the broad range of powers the applicant proposes to give itself,	The Applicant has arranged to meet with CDC on 21 May 2026 to discuss the drafting of the draft Development Consent Order [Document Reference 3.2 Revision 4] and the

Comments on Local Impact Reports (City of Doncaster Council)

	any of the streets specified in Schedule 4 (streets subject to street works) and may— (a) break up or open the street, or any sewer, drain or tunnel under it; (b) drill, tunnel or bore under the street; (c) place and keep apparatus under the street; (d) maintain apparatus under the street, change its position or remove it; (e) repair, replace or otherwise alter the surface or structure of the street or any culvert under the street; and (f) execute any works required for or incidental to any works referred to in sub-paragraphs (a) to (e)". .	without the need for CDC's consent, under this Part. CDC considers Part 3 can be made acceptable by (i) drafting amendments to it, (ii) providing for the application of CDC's permit scheme to the application, and (iii) providing that the highway works proposed under Part 3 will be carried out in accordance with the Council's standard section 278 agreement. Turning to article 11(1), this provision allows the undertaker to interfere with and execute works in or under the streets specified in Schedule 4 for the purposes of the authorised development. Absent a suitable highways side agreement and application of the permit scheme to protect CDC's highways interests, CDC considers article 11(1) should be subject to the street authority's	CDC permit scheme as well as the role of highway agreements will be discussed at that meeting. The Applicant acknowledges that CDC does not currently have a consenting role for the exercise of article 11 of the draft Development Consent Order [Document Reference 3.2 Revision 4]. However, Article 11(1) is expressly limited by reference to Schedule 4, which identifies the specific streets affected and the nature of the proposed works. The scope of this power is therefore currently subject to scrutiny through the examination process, and its exercise is confined to the streets and activities already assessed as part of the application. The Applicant considers a further consenting process to be inappropriate in this context, as it would undermine the "one stop shop" function of Orders under the Planning Act 2008 regime. The amendments proposed by CDC are not standard, in this regard, and would represent a material departure from the widely
--	--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

		consent and amended as follows – “The undertaker may, for the purposes of the authorised development <u>and subject to the consent of the street authority</u>, enter on so much of any of the streets specified in Schedule 4 (streets subject to street works) and may— ...” The same point applies in respect of the following articles:13(1) (power to alter layout, etc. of streets), 15(1) (temporary closure of streets and public rights of way) and 16(1)(a) (access to works). CDC raised similar points last year during the examination of the Fenwick Solar Farm DCO project. During the examination, CDC and the Fenwick applicant agreed a suitable framework highways side agreement, based on CDC’s standard section 278 agreement,	adopted position in DCO drafting. CDC’s amendments also overlook the very significant role it will play in the discharge of requirements under Schedule 2, including Requirement 6 (Detailed design approval). Substantially the same points arise in respect of Article 13(1). However, the Applicant highlights that CDC does have a consenting role in relation to the exercise of general (as opposed to specific) powers to alter the layout of streets under Article 13(2) (Power to alter layout, etc., of streets) of the draft Development Consent Order [Document Reference 3.2 Revision 4]. Accordingly, the Applicant cannot act unilaterally under Article 13(2), and the exercise of the power remains subject to appropriate oversight. The Applicant notes that the powers in Part 3 of the draft Development Consent Order [Document Reference 3.2 Revision 4] are widely preceded as set out in the Explanatory Memorandum
--	--	---	--

Comments on Local Impact Reports (City of Doncaster Council)

		which is mentioned in article 16(3) (agreements with street authorities) of the Fenwick Order as follows – “Prior to the commencement of any works under Part 3 of this Order, the undertaker must enter into an agreement which is substantially in accordance with the framework highways works agreement between the City of Doncaster Council and the undertaker dated 20 August 2025, or any subsequent replacement agreement as to highways works”. CDC considers there is enough time for CDC and the applicant to agree a similar agreement for this project. A similar provision could then be included to article 18 (agreements with street authorities). Similarly, article 9 (application of permit scheme) applies CDC’s	[Document Reference 3.2 Revision 3].
--	--	--	---

Comments on Local Impact Reports (City of Doncaster Council)

		traffic management permit scheme to the street works carried out under that Order. CDC considers the same should apply to the street works under this Order also.	
5	Article 12(4) (application of the 1991 Act) disapply provisions of the New Roads and Street Works Act 1991 in relation to any works executed under the powers conferred by the Order.	Absent a suitable highways side agreement or protective provisions to protect CDC's highways interests, CDC is opposed to the disapplication of certain of these provisions, including sections 73B (power to specify timing etc. of re surfacing), 73C (materials, workmanship and standard of re-surfacing), and 78A (contributions to costs of re-surfacing by undertaker). Please see the text in row 4 regarding the highways side agreement entered into by CDC in	The Applicant clarifies that the provisions listed in article 12(4) do apply, as per article 12(3), in relation to the carrying out of works under article 11 (street works) and the temporary closure, temporary alteration or temporary diversion of a street by the undertaker under article 15 (temporary closure or restriction of streets and public rights of way), whether or not the carrying out of the works or the closure, alteration or diversion constitutes street works within the meaning of that Act. The Applicant has arranged to meet with CDC on 21 May 2026 to discuss the drafting of the draft Development Consent Order [Document Reference 3.2 Revision 4] and the application of the 1991 Act will be discussed.

Comments on Local Impact Reports (City of Doncaster Council)

		respect of the Fenwick Solar Farm Order 2026 (SI 2026/151).	
6	Article 13(2) (power to alter layout, etc., of streets) includes a general power, subject to the consent of the street authority, to alter the layout <u>of any street</u> permanently or temporarily. The general power is not limited to streets within the Order limits. An application for consent is made to the street authority under paragraph (4). Paragraph (5) states – “If a street authority which receives an application for consent under paragraph (4) fails to notify the undertaker of its decision <u>before the end of the period of 28 days beginning with the date on which the application was made, it is deemed to have granted consent</u>”. [Emphasis added].	Twenty-eight days for the determination of applications is too short. The corresponding timeframe in the Fenwick Solar Farm Order 2026 (SI 2026/151) is eight weeks (or such longer period as may be agreed between the undertaker and CDC) (see article 46(4) (procedure in relation to certain approvals etc.). The Secretary of State considered 8 weeks was appropriate in respect of that Order and CDC sees no reason to depart from that timeframe in this Order. As mentioned elsewhere in this table, CDC considers consistency in the administrative arrangements of the DCOs which will affect its area would be helpful. Turning to the 28-day deadline generally, CDC notes the deadline proposed by the applicant is	The Applicant has addressed the concerns raised by CDC in relation to the discharge of requirement in its Written Responses to ExQ1 [Document Reference 8.8 Revision 1] in the response to Q.5.0.8 and Q.5.2.9. In short, the periods referenced by CDC are comparable to the 8-week determination period for the relevant planning authority within the draft DCO [Document Reference 3.1 Revision 4] (paragraph 1(1) of Part 2 of Schedule 2) to consider applications to discharge requirements. In relation to article 13, the Applicant has included a deemed consent provision in article 13(5). This has the effect of consent being deemed to be given should the street authority fail to notify the Applicant of a decision within 28 days

Comments on Local Impact Reports (City of Doncaster Council)

	The 28-day time limit (accompanied by a deeming provision) is also included in the following articles which affect CDC in their role as street or highway authority – 4.1.1. 15(8) (temporary closure or restriction of streets and public rights of way), 4.1.2. 16(2) (access to works), and 4.1.3. 19(8) (traffic regulation measures).	considerably shorter than those included in the precedents referred to by the applicant in the EM [APP-017]. For example – <u>Cottam Solar Project Order 2024 (SI 2024/943)</u> Article 45(4) (Procedure in relation to certain approvals etc.) – <u>ten weeks</u> (or such longer period as may be agreed between the undertaker and the relevant consenting authority in writing) <u>Gate Burton Energy Park Order 2024 (SI 2024/807)</u> Article 43(4) (Procedure in relation to certain approvals etc.) – <u>ten weeks</u> (or such longer period as may be agreed between the undertaker and the relevant consenting authority in writing)	of the receipt of the application. This is considered necessary to avoid undue delay to the delivery of the Scheme. The Applicant notes that the recently published, Nuclear Regulatory Review 2025 produced by a Taskforce led by John Fingleton, recommended that model provisions for DCO drafting should be reinstated to help solve common problems occurring in the consenting of NSIPs. One of the model provisions included in the Review is the inclusion of 28 day decision making period with deemed consent applying at the end of this. On 26 November 2025, the Prime Minister fully endorsed the recommendations of the Review, accepting “the principle of all the recommendations it has set out”. The Applicant therefore considers the inclusion of this provision entirely appropriate and necessary to align with the emerging industry approach.
--	--	--	---

Comments on Local Impact Reports (City of Doncaster Council)

		<u>Mallard Pass Solar Farm Order 2024 (SI 2024/796)</u> Article 43(4) (procedure in relation to certain approvals etc.) – <u>eight weeks</u> (or such longer period as may be agreed between the undertaker and the relevant consenting authority in writing). <u>Longfield Solar Farm Order 2023 (SI 2023/734)</u> Article 42(4) (procedure in relation to certain approvals etc.) – <u>eight weeks</u> (or such longer period as may be agreed between the undertaker and the relevant consenting authority in writing). CDC's requested deadline is therefore consistent with deadlines the Secretary of State has recently considered appropriate inside and outside its administrative area.	
--	--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

7	As mentioned in row 4, article 13(5) (power to alter layout, etc., of streets) states – “If a street authority which receives an application for consent under paragraph (4) fails to notify the undertaker of its decision before the end of the period of 28 days beginning with the date on which the application was made, it is deemed to have granted consent”.	The deeming provision should be followed by the following provision, which has been included consistently in DCOs since around 2020, and which requires the undertaker to inform the authority of the deeming provision when it makes the application – <u>“(X) Any application to which this article applies must include a statement that the provisions of paragraph (2) apply to that application.”</u> The officers dealing with an application under article 13 might not be aware of the deeming provision and so it is reasonable for any application to inform the recipient of that significant power. In addition, a failure to inform the recipient of the power should have a consequence and new paragraph (X) should be followed by –	The Applicant has added wording to Article 13(5) of the draft Development Consent Order [Document Reference 3.2 Revision 4] submitted at Deadline 2 to include the following suggested wording – “(X) Any application to which this article applies must include a statement that the provisions of paragraph (5) apply to that application.” The Applicant has not incorporated the second paragraph suggested as it is clear that this would be the effect of failing to include the statement now required. – The Applicant has arranged to meet with CDC on 21 May 2026 to discuss the drafting of the draft Development Consent Order [Document Reference 3.2 Revision 4] and would be happy to discuss this matter further.
---	---	--	---

Comments on Local Impact Reports (City of Doncaster Council)

		<u>“(Y) If an application for consent under paragraph (4) does not include the statement required under paragraph (X), then the provisions of paragraph (5) will not apply to that application”.</u> New paragraphs (X) and (Y) (or versions of them) should also be included in the following articles, each of which includes a deeming provision: 15(8) (temporary closure or restriction of streets and public rights of way), 16(2) (access to works), and 19(8) (traffic regulation measures), each of which includes a deeming provision.	
8	Article 13(5) (Power to alter layout, etc., of streets) states – “(5) If a street authority which <u>receives</u> an application for consent under paragraph (4) fails to notify the undertaker of its decision before the end of the period of <u>28 days beginning with</u>	By article 13(5), the 28-day period begins “with the date on which the application was made”. It is noted that while the 28-day period in articles 13(5), 15(8) (temporary closure or restriction of streets and public rights of way) and 16(2) (access to works)	The Applicant has made this amendment in the draft Development Consent Order submitted at Deadline 2 [Document Reference 3.2 Revision 4].

Comments on Local Impact Reports (City of Doncaster Council)

	<u>the date on which the application was made</u>, it is deemed to have granted consent". [Emphasis added].	begin on the date on which the application is <u>made</u>, the corresponding period in article 19(8) (traffic regulation measures) begins when the application is <u>received</u> – "(8) If the traffic authority fails to notify the undertaker of its decision within <u>28 days of receiving</u> an application for consent under sub-paragraph (4)(b) the traffic authority is deemed to have granted consent". [Emphasis added]. It is desirable for every period mentioned in the articles mentioned above to begin at the same time and CDC consider it reasonable for the period to begin when the application is received by the decision maker. CDC therefore considers article 13(5) should be amended as follows – "(5) If a street authority which receives an application for	
--	--	---	--

Comments on Local Impact Reports (City of Doncaster Council)

		consent under paragraph (4) fails to notify the undertaker of its decision before the end of the period of 28 days beginning with the date on which the application was made received, it is deemed to have granted consent". Corresponding amendments should be made to articles 15(8) and 16(2).	
9	Article 15(5) (temporary closure or restriction of streets and public rights of way) states – "(5) The undertaker must not temporarily close, prohibit the use of, restrict the use of, authorise the use of, alter or divert— (a) any street or public right of way specified in paragraph (1) without first consulting the street authority during a period of not less than 28 days; and	Article 15(8) demands that an application for consent under article 15(b) must be determined within 28 days, otherwise consent is deemed to be granted. In addition to this, article 15(5) demands consent must not be unreasonably withheld or delayed. With the deeming provisions included there is no need to also say that the approvals must not	The Applicant agrees that the provision of a deemed consent mechanism reduces the prospect of consent being "unreasonably delayed". However, the Applicant does not believe a deemed consent mechanism sufficiently addresses the restriction of consents not being "unreasonably withheld". This restriction ensures that consents are not unjustifiably refused. The Applicant notes that CDC's public law duties would also prevent this but considers it helpful for this restriction to be set out explicitly. The Applicant notes that this wording is well-

Comments on Local Impact Reports (City of Doncaster Council)

	(b) any other street or public right of way without the consent of the street authority, <u>such consent not to be unreasonably withheld or delayed</u>. Article 15(8) states – “(8) If a street authority which receives a valid application for consent under sub-paragraph (5)(b) fails to notify the undertaker of its decision <u>before the end of the period of 28 days beginning with the date on which the application was made, it is deemed to have granted consent</u>”. [Emphasis added].	be “unreasonably withheld or delayed”. In the Sea Link draft DCO [REP6-005], the applicant (National Grid Electricity Transmission) has included “unreasonably withheld or delayed” in the equivalent provision and SCC has sought the deletion of these words. At Deadline 6 of the Sea Link DCO examination, the ExA submitted its <i>Schedule of ExA’s recommended amendments to the applicant’s dDCO</i>. The ExA has recommended the deletion of these for following reasons – “The ExA considers that the inclusion of “which shall not be or must not be unreasonably withheld or delayed” (or a variation of such words) would add ambiguity rather than clarity. CDC agrees and considers article 15(5) should be amended as follows –	precedented. See, for example, Article 12(5)(b) of the A122 (Lower Thames Crossing) Development Consent Order 2025 and Article 13(5)(b) of the Boston Alternative Energy Facility Order 2023.
--	---	---	--

Comments on Local Impact Reports (City of Doncaster Council)

		“(5) The undertaker must not temporarily close, prohibit the use of, restrict the use of, authorise the use of, alter or divert— (a) any street or public right of way specified in paragraph (1) without first consulting the street authority during a period of not less than 28 days; and (b) any other street or public right of way without the consent of the street authority, ~~such consent not to be unreasonably withheld or delayed~~”. The same point applies to article 49(1) (requirements, appeals, etc.) which CDC considers should be amended as follows – “Where an application is made to, or a request is made of, the relevant planning authority or any other relevant person for any consent, agreement or approval	
--	--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

		required or contemplated by any of the provisions of this Order, such consent, agreement or approval must, to be validly given, be given in writing ~~and must not be unreasonably withheld or delayed~~ ".	
10	Article 18 (agreements with street authorities) is a model provision which authorises street authorities and the undertaker to enter into agreements relating to the strengthening, improvement, repair or reconstruction of any streets; the closure, prohibition, restriction, alteration or diversion of any street; the undertaking in any street of any works authorised under articles 11 (street works), 13 (power to alter layout, etc. of streets) and 14 (construction and maintenance of altered streets) of the Order; and the adoption of works.	CDC are concerned by the scope of the powers proposed under Part 3; however, it is possible most concerns can be addressed by making the proposed works under Part 3 subject to an agreement drafted in line with CDC's standard highways agreement. Please see the text in row 4 regarding the highways side agreement entered into by CDC in respect of the Fenwick Solar Farm Order 2026 (SI 2026/151).	The Applicant notes that this article was deleted in the iteration of the draft Development Consent Order submitted at Deadline 1 [REP1-004]. The Applicant considers the inclusion of this article to be unnecessary. The Applicant and street authorities are already able to enter into agreements under the Highways Act 1980. The inclusion of this article is therefore unnecessary and could in fact imply that the ability to enter into agreements should be constructed more narrowly than it would be if

Comments on Local Impact Reports (City of Doncaster Council)

			reliance was placed on the Highways Act 1980 instead. This would not be a logical outcome. The Applicant has arranged to meet with CDC on 21 May 2026 to discuss the drafting of the draft Development Consent Order [Document Reference 3.2 Revision 4] and the role of highway agreements will be discussed.
11	Article 19 (traffic regulation measures" allows the undertaker to temporarily place traffic signs and signals on any road within the Order limits (and certain other roads) for the purposes of the construction, maintenance and decommissioning of the authorised development.	Article 19(1) and (7) refers to an "instrument" to be made by the applicant in respect of its powers under this article. CDC considers it would be helpful if a copy of any instrument were sent to CDC (because it is likely CDC will be the first port of call for any question about these arrangements). In the light of this, CDC would suggest including a	The Applicant has updated the draft DCO [Document Reference 3.1 Revision 4] to include the wording suggested by CDC.

Comments on Local Impact Reports (City of Doncaster Council)

		paragraph along these lines in this article – <u>“(X) A copy of the instrument referred to in paragraph (7)(a) must be sent to the relevant highway authority as soon as reasonably practicable after being made”.</u>	
12	Article 20(3) (discharge of water) states – “The undertaker 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 <u>subject to terms and conditions as that person may reasonably impose</u>”. [Emphasis added].	While article 20(3) states “terms and conditions” may be attached to a consent given under that article, other provisions which require a person’s consent are silent as to whether “terms and conditions” may be imposed. For example – • article 13(4) (power to alter layout, etc., of streets); • article 15(8) (temporary closure or restriction of streets and public rights of way);	The Applicant has amended each of the provisions cited to confirm that the relevant authority may apply reasonable conditions when giving approval under the Order.

Comments on Local Impact Reports (City of Doncaster Council)

		• article 16(2) (access to works); • article 19(4)(b) (traffic regulation measures); and • article 41(6) (felling or lopping of trees and removal of hedgerows). Since there is no restriction on the imposition of conditions, CDC considers they can be added; however, for consistency within the Order and the avoidance of doubt, CDC considers each provision which provides for the grant of consent or approval should state explicitly that conditions may be attached to that consent or approval.	
13	Article 42 (trees subject to tree preservation orders) allows the undertaker to fell or lop or cut back the roots of any tree which is subject to a tree preservation order "within or overhanging land within the Order limits" to prevent	Paragraphs 22.2 and 22.3 of PINS <i>Advice Note Fifteen: drafting Development Consent Orders</i> state – "22.2 Applicants may also wish to include powers allowing them to	The Applicant confirms that there are no known TPO trees subject to proposed works under Article 42, hence the absence of a TPO schedule and plan. The powers in Article 42 have been included to address the Applicant's concern that a tree could

Comments on Local Impact Reports (City of Doncaster Council)

	it obstructing or interfering with the construction, maintenance, operation or decommissioning of the authorised development or any apparatus used in connection with the authorised development	fell, lop or cut back roots of trees subject to a Tree Preservation Order (TPO). This power can extend to trees which are otherwise protected by virtue of being situated in a conservation area. <u>To support the ExA inclusion of this power should be accompanied by a Schedule and plan to specifically identify the affected trees.</u> <u>22.3 Trees subject to TPO and/or are otherwise protected (and likely to be affected) should be specifically identified. It is not appropriate for this power to be included on a precautionary basis. Proper identification of affected trees will enable the ExA to give full consideration to the particular characteristics that gave rise to their designation and the desirability of continuing such protection”.</u> [Emphasis added].	become subject to a TPO following the date the Order is made, which could impede the Applicant’s ability to deliver the Scheme expeditiously. The Applicant considers that the inclusion of the power on a precautionary basis is justified in this context. This is not inconsistent with PINS’ Advice Note 15, properly construed. The Applicant has not identified any existing TPO designations and is only seeking to provide protection in respect of future TPO designations (not current TPO designations which may be overlooked). Such future TPO designations are by definition unknown and cannot be identified at the current time. The Applicant notes that this approach is precededented in solar DCOs. See, for example: • The Longfield Solar Farm Order 2023 (article 37); • The Byers Gill Solar Order 2025 (article 39);
--	---	---	---

Comments on Local Impact Reports (City of Doncaster Council)

		In the light of this advice, CDC considers this article should be accompanied by a TPO Schedule and Plan.	The Heckington Fen Solar Park Order 2025 (article 36)
14	Schedule 2: Requirement 3 (phasing of the authorised development and date of final commissioning)	CDC considers the written scheme approved under Requirement 3 should include a timetable for the construction phase and a plan identifying the phasing area and that a new paragraph along these lines should therefore be included – “The written scheme submitted pursuant to subparagraph (1) must include a timetable for the construction of the phase or phases of the authorised development and a plan identifying the phasing area”. Similar drafting has been included in the equivalent requirement of several solar DCOs including –	The Applicant does not consider it necessary to specify this as the requirement currently provides that “a written scheme setting out the phase or phases of construction of the authorised development” needs to be submitted to and approved by the relevant planning authority. CDC will be able to request information that should be included in this written scheme at the appropriate time. The Applicant considers it unnecessary to set out this detail at this stage. The Applicant acknowledges that the drafting requested by CDC has been included in the solar DCOs cited. However, it also notes that this wording is not included in several solar DCOs including: The Byers Gill Solar Order 2025 (Requirement 2);

Comments on Local Impact Reports (City of Doncaster Council)

		• West Burton Solar Project Order 2025 (SI 2025/116) (requirement 2); • Cottam Solar Project Order 2024 (SI 2024/943) (requirement 2); and • Mallard Pass Solar Farm Order 2024 (SI 2024/796) (requirement 3).	• The Stonestreet Green Solar Order 2025 (Requirement 3); • The Longfield Solar Farm Order 2023 (Requirement 3)
15	Schedule 2: Requirement 9 (fencing and other means of enclosure)	The equivalent requirement (requirement 9) of the Fenwick Solar Farm Order 2026 (SI 2026/151) applies (by paragraph (3)) that requirement to any permitted preliminary works. CDC considers similar provision should be included in Requirement 9 of the draft DCO. CDC considers, after paragraph (2), the following should be included –	The Applicant has amended the draft DCO [Document Reference 3.1 Revision 4] to include CDC's suggested drafting.

Comments on Local Impact Reports (City of Doncaster Council)

		<u>"(2A) For the purposes of sub-paragraph (1), "commence" includes any permitted preliminary works".</u>	
16	Schedule 2: Requirement 11 (surface and foul water drainage)	Noting that most control documents mentioned in the Requirements are preceded by an outline version, CDC would like to know whether the applicant intends to submit an outline water drainage strategy into the examination and, if not, CDC would be grateful for an explanation. Moreover, and consistent with requirement 10 (surface and foul water drainage) of the Fenwick Solar Farm Order 2026 (SI 2026/151), CDC considers the requirement should apply to any site preparation works. CDC considers, after paragraph (2), the following should be included –	The Applicant has prepared and submitted an outline surface water drainage strategy. This is contained at Appendix L of Environmental Statement Appendix 10.1: Flood Risk Assessment [Document Reference 6.3.10.1 Revision 3]. The Applicant does not consider that the addition of paragraph (3) as suggested by CDC is appropriate and notes that it is not widely preceded and has not been justified by CDC (save for the reference to the Fenwick Solar Farm Order 2026).

Comments on Local Impact Reports (City of Doncaster Council)

		<u>“(3) For the purposes of sub-paragraph (1), “commence” includes any site preparation works”.</u>	
17	Schedule 2: Requirement 12 (archaeology)	Please see paragraph 8.32 (draft Development Consent Order) of the Local Impact Report for South Yorkshire Archaeology Service’s comments on how this requirement can be improved.	The Applicant has set out its response to the proposed changes to requirement 12 of Schedule 2 to the draft Development Consent Order [Document Reference 3.2 Revision 4] against paragraph 16.2 of this document.
18	Schedule 2: additional requirement (AIL, abnormal indivisible loads)	Please see paragraph 12.4 (key local issues) of the Local Impact Report for CDC’s comments on the applicant’s proposed requirement to control Abnormal Indivisible Loads, which is awaited.	The Applicant has agreed to the suggestions made and has set out its response against paragraph 12.4 of this document.
19	Schedule 2, part 2, paragraph 4 (fees)	The first point to make is that while CDC will be required to deal with applications for consent	The Applicant has arranged to meet with CDC on 21 May 2026 to discuss the drafting of the draft Development Consent Order [Document

Comments on Local Impact Reports (City of Doncaster Council)

		under articles and under requirements, by paragraph 4(1), a fee is only payable in respect of requirements. CDC considers that a fee should also be paid for dealing with applications under articles. The second point to make is that the proposed fee is too low. Paragraph 4(1) applies the fee prescribed in regulation 16(1)(b) of the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012. This amounts to £145. If we assume an hourly rate of £100 for an officer to deal with this work, it will mean the officer would have to deal with any discharge application within approximately 1 hour and 24 minutes before dealing with the application was costing CDC money. It is unlikely that any application will be capable of	Reference 3.2 Revision 4] and will discuss these matters with CDC. The Applicant does however note that the prescribed fee under regulation 16(1)(b) of the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 is now £298. This is more than double the figure quoted by CDC (which applied before 1 April 2025). The Applicant hopes that this clarification will address CDC's concerns but will discuss the matter further with CDC.
--	--	---	--

Comments on Local Impact Reports (City of Doncaster Council)

		determination within that time. While no local authority can make a profit for this work, it is reasonable for it to seek the full recovery of the actual costs incurred. This is not only about fairness but also about the way in which the Order is drafted. For example, by paragraph 1(1) of Part 2 Schedule 2, CDC will have 8 weeks to make its decision on any application and if no decision is made within that period, consent will be deemed to have been granted. A similar regime applies in respect of consents sought under articles. Dealing with any application for consent under this Order will therefore be a matter of high priority for the relevant planning authority and it is possible that external help will be sought to ensure matters are dealt with on time.	
--	--	--	--

Comments on Local Impact Reports (City of Doncaster Council)

		Rather than the regime currently proposed in the Order, CDC considers it would be preferable if the applicant and CDC entered into a planning performance agreement ("PPA") for the full recovery of CDC's costs in discharging any application under the Order. There is enough time to agree a PPA during the Examination and CDC would welcome discussions to begin in earnest on the same. Once the PPA is agreed, existing paragraph 4 can be replaced with a provision which states fees for applications will be paid in accordance with the PPA. This was achieved in respect of the Fenwick Solar Farm Order 2026 (SI 2026/151). Paragraph 5 (fees) of Schedule 15 (procedure for discharge of requirements) to that Order states – "Where an application is made to the relevant planning authority for	
--	--	---	--

Comments on Local Impact Reports (City of Doncaster Council)

		written consent, agreement or approval in respect of a requirement, or any other consent or approval under the articles of the Order, the applicant shall pay the costs in accordance with the agreement entered into by the undertaker and City of Doncaster Council on 20 August 2025, or any subsequent replacement agreement as to costs”. This is a key point for CDC. CDC trusts an equivalent provision can be included in the instant Order.	
--	--	--	--

