City of Doncaster Council

Planning Act 2008 (As Amended)

Infrastructure Planning (Examination Procedure) Rules 2010

City of Doncaster Council's response to The Examining Authority's written questions and requests for information (ExQ1): Issued on 24 April 2026

Project: Tween Bridge Solar Farm (EN010148)

Applicant: RWE Renewables UK Solar and Storage Limited

Unique Reference: F2CFC15A3

19th May 2026

Application by RWE Renewables UK Solar and Storage Limited for Tween Bridge Solar Farm Project
The Examining Authority's written questions and requests for information (ExQ1): Issued on 24 April 2026

City of Doncaster Council (CDC) Responses to Questions for CDC See attached ExQ1 questions for the full list of questions.

1. General and Cross-Topic Questions			
Q1.0.3	Applicant, North Lincolnshire Council (NLC) and City of Doncaster Council (CDC)	**Updated National Policy Statements (NPS)** Could the applicant, NLC and CDC please provide representations on the effect of the changes to NPS, with EN-1,3 and 5 having come into force on 6 January 2026? Please consider the transitional arrangements and whether the revised NPS are 'important and relevant' to the Secretary of State's (SoS) decision.	It is the Council's understanding as stated in Section 1.6 of NPS1 (paragraphs 6.1.2 and 6.1.3) (December 2025), that: *"transition provisions should apply for the 2025 NPSs, so that for any application accepted for examination before the final publication of the approved 2025 amendments, the 2024 suite of NPSs should have effect in accordance with the terms of those NPSs.* *The 2025 amendments will therefore have effect only in relation to those applications for development consent accepted for examination after the final publication of those amendments".* Acceptance of the Tween Bridge Solar Farm application was on 23rd December 2025, whereas the final publication of the approved 2025 amendments to NPSs EN-1, EN3 and EN5 was on 6 January 2026. Accordingly, the transition provisions do apply in this case and the application should be determined on the basis of the 2024 suite of NPSs. The Council is cognisant of the Planning Act 2008 Section 104(2)(d) which states that In deciding the application the Secretary of State must have regard to - any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision. Accordingly the

			ExA and ultimately the Secretary of State may also wish to have regard to the direction of travel of the changes to NPS, with EN-1,3 and 5 having come into force on 6 January 2026.
Q1.0.4	Applicant, NLC and CDC	**CNP** In discussing Critical National Priority infrastructure, Planning Statement [APP-030] paragraph 8.2.3 indicates that the applicant has 'relied' upon CNP in relation to the 'landscape and visual' and 'ecology and nature conservation' effects of the proposed development. Could the applicant please review the approach taken to CNP in recently made solar DCO recommendation reports and decision letters and confirm whether it is relying on CNP policy? Could NLC and CDC also set out their respective positions on the application of the planning balance and in particular, the effect of NPS EN-3 policies on CNP?	CDC considers the following NPSs are relevant to the instant application: • Overarching National Policy Statement for Energy (January 2024) (NPS EN-1); • National Policy Statement for Renewable Energy Infrastructure (January 2024) (NPS EN-3); and • National Policy Statement for Electricity Networks (January 2024) (NPS EN-5). Section 4.2 of NPS EN-1 states that to support the urgent need for new low carbon infrastructure, all onshore and offshore electricity generation covered within the NPS that do not involve fossil fuel combustion are considered to be Critical National Priority (CNP) infrastructure. This includes NSIPs for solar photovoltaic. NPS EN-3 sets out additional policies for renewable energy infrastructure that should be read in addition to the overarching policies set out in EN-1. For example: • Paragraph 1.1.2 states that electricity generation from renewable sources is an essential element of the transition to net zero and meeting targets for the sixth carbon budget; • Paragraph 1.6.1 states that EN-3 covers solar photovoltaic generating stations that are over 50MW; • Paragraph 2.10.9 states that the government has committed to sustained growth in solar capacity to contribute towards meeting net zero emissions by 2050

			and as such, “solar is a key part of the government’s strategy for low-cost decarbonisation of the energy sector”; and • Paragraph 2.10.10 states that solar has an important role in “delivering the government’s goals for greater energy independence”. NPS EN-5 sets out policy relevant to electricity transmission and distribution systems, from transmission systems to end user. Paragraph 1.6.4 states that it can cover development “if it constitutes associated development for which consent is sought along with an NSIP”. Schedule 1 to the draft DCO lists Work Nos. 2 to 8 as “associated development within the meaning of section 115(2) of the [Planning Act 2008]” and this includes Work No. 5, the BESS. This associated development element of the authorised development could come within the scope of EN-5. By section 104(2) of the Planning Act 2008, the Secretary of State must have regard to these relevant NPSs when determining the instant application. (Similarly, the Secretary of State must have regard to any duly submitted LIR, any matters prescribed in relation to the development, and any other matters the SoS thinks are both important and relevant to the decision). Turning to CAP, paragraph 8.2.10 of the ExA’s Report and Recommendation for the Fenwick Solar Farm project states –

			"We are satisfied that the mitigation hierarchy has been fully explored and the mitigation proposed has been secured by the requirements and other controls included in the rDCO. However, as our recommendation is already in favour of the proposed development, we do not consider it is necessary to apply the further tests set out in NPS EN-1 in relation to Critical National Priority". We assume the ExA for the instant application would follow a similar approach in respect of the application of CAP.
Q1.0.6	CDC, NLC and the applicant	**Community Benefit Fund** Planning Statement [APP-030] paragraph 8.1.16 states in part that a "Community Benefit Fund of approximately £12.8 million" would constitute a benefit of the proposed development. Could the Councils and the applicant please provide their opinion on whether this should be weighed in the planning balance as a benefit?	In R (on the application of Wright) v Resilient Energy Severndale Ltd and Forest of Dean District Council [2019] UKSC 53, the Supreme Court ("the Court") considered whether the promise to provide a community fund donation qualifies as a "material consideration" for the purposes of section 70(2) of the Town and Country Planning Act 1990 ("TCPA") and section 38(6) of the Planning and Compulsory Purchase Act 2004 ("PCPA"). The Court explained – • a three-part test for "material considerations" is included in Newbury District Council v Secretary of State for the Environment [1981] AC 578 ("Newbury") where it was held that the conditions imposed: (1) be for a planning purpose and not for any ulterior purpose; (2) fairly and reasonably relate to the development; and (3) must not be so unreasonable that no reasonable planning authority could have imposed them; • it is logical to equate the ambit of "material considerations" with the scope of the power to impose planning conditions, because if the planning authority has the power to impose a condition it follows that it

			could treat the imposition of that condition as a material factor in favour of granting permission; and • the community benefits promised by Resilient did not satisfy the Newbury criteria and therefore did not qualify as a material consideration under either the TCPA or the PCPA. The benefits were not proposed to pursue a proper planning purpose, but rather for the ulterior purpose of providing general benefits to the community. They did not fairly and reasonably relate to the development for which permission was sought; the community benefits did not affect the use of the land but were instead proffered as a general inducement to the Council to grant planning permission, in breach of the principle that planning permission cannot be bought or sold. Whether or not a community fund should be weighed within the planning balance will depend on whether it can properly be considered a "material consideration". CDC notes paragraph 4.9.30 of the Planning Statement [APP-030] which concludes that the fund proposed here "sits outside of the DCO Application and, at this moment in time as such, carries no weight as part of the overall planning balance to be considered by the Examining Authority and SoS". CDC has not seen anything that leads it to disagree with this conclusion.
4. Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations			
Q4.0.9	All affected persons	Accuracy of the Book of Reference, Land Plans and Points of Clarification APs are asked to please provide comments on the following:	With reference to Q4.0.9 below, CDC has a query concerning the Book of Reference, specifically referring to plots 2/5, 2/6 and 2/9, on pages 75,76 and 78, which are about permanent acquisition of new rights over 228 square metres, 1297

		a) If they are aware of any inaccuracies in the BoR [APP-021], the Statement of Reasons [APP-019] or the Land Plans [APP-008]. If so, please indicate where these are and provide the correct details. b) Views on whether there may be any reasonable alternatives to CA or Temporary Possession (TP) sought by the applicant. c) Views on whether there are any areas of land or rights that the applicant is seeking the power to acquire that you consider are not needed. d) Details of any other concerns relating to the legitimacy, proportionality or necessity of the CA or TP powers sought by the applicant that would affect the land that you own or have an interest in.	square metres and 10925 square metres respectively of track and grass verge including public footpath Thorne 19. Public Footpath No.19 has a recorded width of 9.14 metres and it is 2.67 km in length (as recorded on the definitive map and statement, the legal record of public rights of way) so covers a total area of approximately 24000 square metres; can CDC have clarification on just where within the width Applicants rights will be or is there a need to reevaluate this based on the recorded width?
5.2 Schedules			
Q5.2.9	Applicant, CDC, NLC EA and NE.	Draft DCO Schedule 2 Requirement 22 [AS-003] Please could the applicant provide justification for the 21-day consultation period referred to with reference to recently made solar DCOs? Please could the Councils, EA and Natural England provide comments on the acceptability or otherwise of this consultation period, with reasons given?	The Fenwick Solar Farm Order 2026 (SI 2026/151) ("the Fenwick Order") authorises the construction and operation of a solar farm in CDC's administrative area. Owing to that project's location and the type of project it is, CDC has limited its consideration of precedents to the Fenwick Order. By paragraph 2(2) of the Fenwick Order, an application for consent under a requirement must be determined within eight weeks. By paragraph 3(3) (further information and consultation) of Schedule 15 (procedure for discharge of requirements) to the Fenwick Order, if a requirement requires consultation with a requirement consultee, CDC must issue the consultation to the requirement consultee within 10 working days of receipt of the application. If the requirement consultee requests further information, CDC

			must notify the undertaker within 10 working days of that request. There is no time limit in the Fenwick Order for the consultee to respond to CDC and so the consultation regime within requirements is something for CDC must manage within the eight-week period, which is capable of being extended by virtue of paragraph 2(2)(c). This regime is different from that included in Requirement 22 of the instant Order where the undertaker must provide the requirement consultee with at least 21 business days (i.e. slightly more than 4 weeks for a response). In the first instance, and subject to the point made in the following paragraph, it appears that this period does not seem unreasonable; however, CDC would suggest that the ExA directs this question to each consultee named in the requirements (i.e. for requirement 7 (fire safety management): the South Yorkshire Fire and Rescue or the Humberside Fire and Rescue Service; for requirement 11 (surface and foul water drainage): the relevant internal drainage board, the Environment Agency, Yorkshire Water, and Severn Trent Water; and for requirement 13 (controlled site): the Secretary of State for Defence. The point mentioned in the preceding paragraph concerns the inflexibility of the 21-business day period. As drafted, there is no scope for extending that deadline and CDC considers it would be sensible if flexibility were provided. It will be appreciated that, despite a consultee's best efforts, additional time might be required to respond to a consultation question. It would be better for the proper

			determination of a requirement if a full response was received outside the stated deadline, rather than no response at all. CDC would therefore suggest requirement 22 is recast as follows – "22. In relation to any provision of this Schedule requiring details to be submitted to the relevant planning authority for approval following consultation by the undertaker with another party, the undertaker must provide such other party with not less than 21 business days (or such longer period as may be agreed between the undertaker and the relevant planning authority) for any response to the consultation and thereafter the details submitted to the relevant planning authority for approval must be accompanied by a summary report setting out the consultation undertaken by the undertaker to inform the details submitted including copies of any representations made by a consultee about the details proposed to be submitted to the relevant planning authority by the undertaker and the undertaker's response to those representations". **Updated draft Development Consent Order** CDC's LIR [**REP1-062**] includes, at Appendix 2, its comments on the draft DCO [**AS-003**]. CDC note an updated draft DCO was submitted at Deadline 1 [**REP1-005**]. On 21 May 2026, CDC are meeting the applicant to discuss CDC's comments on the draft DCO. CDC understand the applicant will be providing a response to CDC's comments at

			Deadline 2 and intend to make any changes to the draft DCO at Deadline 3. Subject to one point, CDC do not propose to comment on the Deadline 1 draft DCO [REP1-005] now but will consolidate all comments in the reply to the Deadline 3 version. The point CDC wishes to emphasise now concerns the proposed deletion of article 18 (agreements with street authorities). CDC explains in Appendix 2 to the LIR that it is concerned by the wide-ranging scope of the powers under Part 3 (street works) of the draft DCO and that it considers these concerns can be addressed by the parties entering into an appropriate agreement, based on CDC's standard section 278 agreement. During the examination of the Fenwick Solar Farm project, CDC and the Fenwick applicant agreed a framework highways agreement that subsequent agreements for street works will have to substantially accord with. In addition, article 16(3) of the Fenwick Solar Farm Order 2026 (SI 2026/151) states – "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 a similar agreement can be agreed with the applicant during the course of the examination and that

			article 18 can be replaced with a provision similar to article 16(3) of the Fenwick Order.
6. Cultural Heritage			
Q6.0.7	Applicant and CDC	**Archaeological Surveys** In CDC's RR [RR-006] the council asserts that the applicant has not undertaken sufficient archaeological evaluation. It is noted that CDC suggests that further pre-decision evaluation could include areas covered by more intrusive components of the development. Could CDC and the applicant please set out their positions on the required extent and scope of pre-decision and post-decision archaeological evaluation? In doing so, examples of work undertaken on other DCO solar developments should be identified, if relevant.	SYAS Position (on behalf of CDC) SYAS' position is that the current level of archaeological evaluation undertaken by the applicant is insufficient to meet national policy requirements, particularly in relation to understanding archaeological potential across the Order Limits. We consider that additional pre-decision evaluation is required in areas where there is both higher archaeological potential and a higher scheme impact. A programme of post-decision evaluation could be appropriate in areas where impacts are demonstrably lower and design flexibility exists. This approach reflects a structured and proportionate strategy, ensuring that uncertainty is reduced prior to determination while allowing flexibility where justified. Relevant policy requires assessment not only of known heritage assets, but also of the potential for currently unknown archaeological remains across the site (NPS EN-1 5.9.13). As such, the heritage assessment needs to integrate known archaeological sites with the geoarchaeological, geophysical and topographic evidence to identify patterns of past activity at a landscape scale. This requirement has not been met and, as a consequence, there is not a sufficiently robust evidence base to allow informed decision-making on impact and mitigation. Magnetometry has been relied on as the main evaluation technique but the influence of the alluvial deposits on the effectiveness of the geophysical survey technique has not been resolved. The applicants contend that the survey was

			targeted at understanding near surface archaeological remains- "Magnetometry was not intended for consideration of deep deposits" (APP-045 ES Ch 8. Table 8-3: Summary of Consultation)- and the geoarchaeological desk-based assessment is the only site wide consideration of the potential for deeply buried remains. In addition, the effectiveness of the geophysical survey in identifying near surface archaeological remains is uncertain. Cropmark data indicated Romano-British activity in the Sandtoft area. Area 3 of the trial trench evaluation targeted this area identifying a Romano-British settlement dated to the 2nd/ 3rd century recording features consistent with the cropmark evidence. Despite only being covered by, on average, 30cm-50cm of topsoil and subsoil, none of the features associated with this settlement were recorded as anomalies by the geophysical survey. Given this, it remains unclear whether apparent absences of archaeology reflect genuine patterns or are the result of masking by alluvial deposits. This results in a level of uncertainty that, in SYAS' view, is too great to be addressed solely through post-decision mitigation. SYAS considers that a zoned, landscape-led approach to archaeological evaluation is required. A more robust baseline understanding integrating the various strands of evidence would provide a nuanced and spatially differentiated understanding of the archaeological sensitivity across the order limits. This could be correlated with the different levels of anticipated ground disturbance from components of the scheme to identify zones with differing levels of impact upon the significance of any heritage assets. This zoning approach allows evaluation effort to be targeted and proportionate, while ensuring that key risks are addressed prior to determination.

			In zones where both development impact and archaeological sensitivity are high, SYAS consider that further pre-decision evaluation would be required. The full scope of such work would be contingent on the size of the zone and character of the evidence in each zone. It would likely include • borehole survey and deposit modelling to define sub-surface stratigraphy and identify features such as palaeochannels, peat deposits, and buried soils; • targeted fieldwalking to refine areas of activity and artefact distribution; • trial trenching focused on areas of more defined known activity such as cropmark complexes. This work would help to reduce uncertainty to more acceptable levels through a fuller assessment of significance and impact and the results would inform a more credible and proportionate mitigation strategy. Post-decision evaluation, secured through requirements, may be appropriate in zones where the magnitude of impact is lower, design flexibility can be clearly demonstrated and baseline evidence shows that significant archaeological remains are unlikely or can be adequately managed through mitigation. However, SYAS emphasises that post-decision evaluation or mitigation should not be relied upon to resolve fundamental uncertainties in higher-risk areas. Large scale solar farms are a relatively new type of development and archaeological approaches to assessing impacts at such scale are still being refined. The SYAS

			approach is, however, comparable to that undertaken in other areas and accords with developing good practice. The recently consented Fenwick solar scheme in South Yorkshire covers an area of approximately 536ha. Pre-decision archaeological work consisted of a desk-based assessment, geophysical survey (magnetometry) and a programme of trial trenching (649 trenches). The geophysical survey successfully identified multiple archaeological anomalies as the site was not covered by deep alluvial deposits. The trenching enabled the significance of the buried remains to be understood and detailed plans for their mitigation were included as part of the ES submission. A few fields and the grid connection corridor were not able to be assessed pre-decision but the level of work undertaken generated a confidence in the understanding of the site as whole allowing those investigations to be completed post-decision. Also in South Yorkshire, the Whitestone Solar Farm project is at the pre-application stage. Discussions are ongoing about the wider archaeological strategy to assess this site of approximately 1500ha but pre-decision work has so far included a desk-based assessment, geophysical survey (magnetometry) and trial trenching targeted on proposed high impact areas of the scheme. Areas of known high archaeological potential have been excluded from any development within the proposed order limits. Tillbridge Solar project is a DCO scheme of approximately 1400ha within the counties of Lincolnshire and Nottinghamshire. It was granted consent in October 2025. Like Tween Bridge, extensive alluvial deposits were recorded

			across the site. Pre-decision archaeological work consisted of a desk-based assessment, geoarchaeological borehole survey and deposit modelling, geophysical survey and a programme of trial trenching consisting of 2628 trenches. East Park Energy is a solar scheme within Bedfordshire and Cambridgeshire currently at the examination stage. The scheme covers approximately 773ha and has some similarities with Tween Bridge in that alluvial deposits are present in the northern part of the site along river channels. A staged approach was taken to pre-decision assessment with a geophysical survey followed by a programme of trial trenching consisting of 937 trenches. These examples demonstrate a staged approach to archaeological evaluation with a much greater degree of intrusive investigation in order to provide detailed information about archaeological potential so that informed decisions can be made. In summary, SYAS considers that the current level of archaeological evaluation is not sufficient to support determination. A zoned, landscape-led approach is required to identify areas of higher impact and archaeological potential where additional pre-decision work is necessary. The current level of uncertainty is too great to address with post-decision evaluation and mitigation. This approach will ensure that the Examining Authority can reach a decision based on a robust and evidence-led understanding of archaeological risk, consistent with national policy and established DCO practice.
7. Flood Risk, Hydrology, and Water Resources			

Q7.0.22	EA, CDC and NLC	**Outline Surface Water Drainage Strategy** Could the EA and Council's please confirm the acceptability or otherwise (in principle) of the outline surface water drainage strategy at FRA section 7 and appendices I and J [APP-108-109]?	CDC, in its capacity as Lead Local Flood Authority (LLFA), 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 resolving matters requiring further discussion, which the LLFA considers to be achievable.
Q7.0.31	Applicant, EA, NLC and CDC	**Operational reason for locating in flood zone 3b** NPS EN-1 paragraph 5.8.41 states in full: "Energy projects should not normally be consented within Flood Zone 3b , or Zone C2 in Wales, or on land expected to fall within these zones within its predicted lifetime. This may also apply where land is subject to other sources of flooding (for example surface water). However, where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows." Please could the applicant explain whether there are any operational reasons why this development needs to be located within flood zone 3b? Please could the EA and Councils provide their views on this?	The LLFA do not apply the sequential/exception test, and by extension, have no comment to make on this aspect.
Q7.0.33	CDC, NLC and Severn Trent Water	**Sewer or other man made flood risk sources:** The FRA [APP-108] states at paragraph 5.56 that "The North and North East Lincolnshire SFRA (2022) states that "sewerage drainage problems have been mapped on their interactive maps".	The SFRA referenced relates to the North Lincolnshire Council SFRA. CDC have recently published an updated Level 1 SFRA (2026), which does not reference "sewerage drainage problems have been mapped on their interactive maps". Therefore, CDC LLFA have no comment to make on this aspect.

		These interactive maps have not been found freely available to view online by the applicant." Can the LLFA and / or Severn Trent Water provide the relevant maps to the applicant for consideration within an amended FRA?	
Q7.0.34	All interested parties	**Use of climate change allowances:** Paragraphs 5.9 and 5.24 of the FRA [APP-108] state that the 1 in 1000 year flood event has been used to assess the design of flood risk mitigation measures and represents a precautionary approach with a greater extent than the required 1 in 100 year plus climate change event for fluvial flooding and the required 1 in 200 year plus climate change event for tidal flooding. As such, no additional allowance for climate change has been included in the assessment beyond this. To all relevant IPs - please can you confirm if there are any comments you wish to make on the chosen climate change allowances?	CDC LLFA can confirm that the Climate Change allowance put forward by the applicant, and which forms part of the wider drainage proposals, are acceptable and in line with current national standards.
8. Landscape and Visual			
Q8.0.7	CDC and NLC	**Residential Visual Amenity Assessment (RVAA)** Could the Councils please provide their views on the absence of a RVAA for 'involved properties' as listed at table 1-1 of the applicant's ES Appendix 6.2 [APP-062]?	Residential Visual Amenity Assessment is undertaken in line with Landscape Institute Technical Guidance TGN 02/2019. TGN 02/2019 is silent on the consideration of properties that have a financial involvement or financial interest in a proposed development. The scope and approach to undertaking RVAA is left to professional judgement. Paragraph 3.1 - “In terms of general approach RVAA should provide a transparent, objective assessment, grounded in GLVIA3 principles and processes, evaluating and assessing the likely change to the visual amenity of a dwelling resulting from a development.”

			Paragraph 4.4 – "There are no standard criteria for defining the RVAA study area nor for the scope of the RVAA, which should be determined on a case-by-case basis taking both the type and scale of proposed development, as well as the landscape and visual context, into account." Having reviewed other submitted solar farm LVIAs, it is a mixed picture as to the approach taken by landscape professionals; some explicitly exclude properties with a financial interest in the development, others do assess the involved properties, but make it clear of the involvement, and there are others that are silent on the matter and assess all properties within a defined study area. There does appear to be an approach in a number of examples where 'weight' is placed on residential properties with a financial involvement. They are not scoped out of the assessment, but their involvement is considered. An approach suggested by CDC and NLC is to determine and confirm whether the financially involved properties are resided in by those that will receive financial gain and that the properties aren't tenanted. If tenants are present, it is suggested that these should have been assessed accordingly.
9. Land Use, Soil and Ground Conditions			
Q9.0.17	NE, CDC and the Applicant	**Peatland** CDC RR [RR-006] paras 11.5 to 11.8 suggest that the Council considers the applicant has not sufficiently considered the effect of the proposed development on Peat. It appears that this is only addressed in ES Chapter 14 [APP-051] at paragraphs 14.4.15 to 14.4.17. Could NE	The basis of CDC's questions in respect of Peatlands stems specifically from a longstanding concern that CDC have in respect of loss of peatland and this as expressed in actual areas lost through developments. CDC does not have the expertise to comment on carbon emissions as it does not monitor these as a Local Authority. Its concern arises from a habitat loss perspective. CDC works closely with Natural

		and CDC explain what, if any, effects might arise associated with peat and whether these are sufficiently addressed in these paragraphs. The applicant asserts that shallow construction depths (similar to cultivation) are such that "minimal disturbance of peat soils will occur and carbon emissions will not be materially different to the current agricultural use of the land." Could the applicant please explain how this conclusion applies to BESS units, substations, other infrastructure and cable laying? Please could the applicant also consider the likely effects during each phase of the development?	England in a liaison group working on peatland restoration and would not wish to see this work compromised by the impacts of peat loss through the Tween Bridge DCO. CDC has looked at the Applicants response in respect of the locations of the BESS sites which would potentially be the most significant areas of peat loss. Relating the BESS sites to current land use/baseline habitats it appears to CDC that these would in the majority of cases be sited on land currently under cultivation so any peat loss will have occurred in the past and could not be attributed to the siting of BESS and other infrastructure. That is not to say that there would not be some peat loss through BESS and infrastructure works but CDC does not consider this will be of such significance that it would maintain an objection.
13. Transport and Access			
Q13.0.6	Applicant, NLC and CDC	**Approach to assessment** ES paragraph 12.5.22 [APP-049] states in full: "With reference to paragraph 12.3.4, only Link 19 (Marsh Road) requires further assessment on the basis that it has a high sensitivity ((as set out at Appendix 12.2 - Summary of Sensitive Receptors [Document Reference 6.3.12.2]) and a 27.8 percent impact in HGV traffic." Could the applicant please expand on the rationale for the apparent exclusion of all other links from a more detailed assessment of effects. Whilst the ExA broadly acknowledges the approach taken, presumably certain effects are not only directly correlated to the interrelationship between baseline traffic and additional traffic. For example, where is the ES	CDC is unaware of the location of Marsh Lane; but assume that is in North Lincolnshire.

		assessment of the effect of new or altered construction access points on highway safety? Are the Council's satisfied with the methodological approach taken by the applicant in this regard? The ExA notes that ES paragraph 12.3.4 refers to Rule 2 of the IEMA traffic guidelines at paragraph 12.3.4. This rule suggests the inclusion of 'any other specifically sensitive areas where traffic flows (or HGV component) are predicted to increase by more than 10%.' Could the applicant explain whether, how and where consideration has been given to this rule?	