

Date: 19 May 2026  
Our ref: 547702  
Your ref: EN010148



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**BY EMAIL ONLY**

Dear Inspector,

**NSIP Reference Name / Code: Tween Bridge Solar Farm Project EN010148**

**Natural England's initial response to the Examining Authority's (ExA's) written questions and requests for information (ExQ1).**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

For any further advice on this consultation please contact the case officer [REDACTED] at [REDACTED]@NaturalEngland.org.UK and copy to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully,

[REDACTED]  
Yorkshire and Northern Lincolnshire Area Team  
Natural England

## 1. Natural England’s response to the Examining Authority’s (ExA’s) first written questions and requests for information (ExQ1)

Table A: Natural England’s response to ExQ1 (Issued on 24 April 2026)			
ExA question ref	Question addressed to	Question	Answer
Q2.0.28	Applicant and Natural England	<p><b>Nightjar</b> NEs relevant representation (RR) [RR-023] indicates that areas within the order limits may constitute functionally linked land for the Thorne and Hatfield Moor SPA, given the evidence of foraging behaviour of nightjar. What is the applicant’s response to this point and what are the implications for the assessment contained in the ES and set out in the Report to inform Habitat Regulations Assessment (in particular at paragraph 7.2.8) [AS-004]?</p>	<p>Natural England notes that this question is primarily addressed to the Applicant. However, we confirm this issue remains outstanding and under discussion. We have note key mitigation measures for impacts on foraging nightjar associated with Thorne and Hatfield Moor SPA should focus on provision of sufficient margins adjacent to the southern boundary of Thorne Moor and the northern boundary of Hatfield Moor, as well as in areas identified through tagging studies as supporting nightjar foraging activity.</p> <p>Natural England have previously highlighted that the proposed 2m margins are relatively narrow and may not be sufficient to adequately avoid or reduce effects, and we have advised that wider margins should be considered in key areas to provide greater confidence in the efficacy of mitigation.</p> <p>We are aware that the Applicant has now submitted a revised Outline Landscape and Ecological Management Plan and Habitats Regulations Assessment at Deadline 1 (published 07 May 2026). Due to significant capacity constraints, Natural England will not be able to review these documents prior to Deadline 2 (ExQ1) but will undertake review and provide further update at Deadline 3 (Tuesday 30 June 2026). Natural England will also continue to engage constructively with the Applicant to seek resolution of this matter outside of the formal Examination process.</p>

**Table A: Natural England’s response to ExQ1 (Issued on 24 April 2026)**

ExA question ref	Question addressed to	Question	Answer
Q2.0.35	Applicant and Natural England	<p><b>Habitats Regulations Assessment - Inclusion of the Thorne and Hatfield Moors SPA and Thorne Moor SAC within the Order limits</b></p> <p>1. Throughout the HRA report [AS-004], it is stated that an area of 0.53 hectares of the Thorne and Hatfield Moors SPA and Thorne Moor SAC is within the Order limits. Whilst it is stated in the HRA that there is no development planned within the SPA/ SAC, it is not stated why the applicant has considered it necessary to include these sites within the Order limits. There are, however, references in the HRA and accompanying documents to the use of buffer zones. Please can the applicant provide the rationale for the inclusion of the Thorne and Hatfield Moors SPA and Thorne Moor SAC within the order limits?</p> <p>2. If it is the case that this (1) is for the purpose of ensuring a buffer zone between the qualifying features of the SPA/ SAC and the proposed development, this does not appear to be applied anywhere else as the order limits are instead offset from the SPA/ SAC boundary elsewhere. Please can the applicant provide the rationale for the inclusion of this area only and no other areas</p>	<p>In our Relevant Representations response, Natural England stated that <i>“We welcome that no works are scheduled within the SAC/SPA/SSSI; however, we advise that this restriction to works within the designated site boundary should be suitably secured via the DCO or associated plans. We would welcome clarification as to how this is secured.”</i></p> <p>This matter remains under discussion between Natural England and the Applicant. However, we are aware, through initial review and comments provided to the Applicant on 08 May 26 on the draft Statement of Common Ground (SoCG), that the Applicant is updating the proposed approach to securing the restriction of works within designated sites.</p> <p>We acknowledge that a first draft of the SoCG has been published on 07 May 26, however, due to capacity restrictions Natural England were only able to send comments to the Applicant by 08 May 26. The Applicant was informed that we would not be able to send comments until this date on 29 April 2026. We have therefore requested the Applicant to provide an updated version of the SoCG, incorporating our comments, to be submitted by Deadline 2.</p> <p>Natural England will review the Applicant’s updated Outline Environmental Construction Management Plan (oECMP) and associated documents and will provide further detailed comments for Deadline 3. At this stage, Natural England has no specific additional comments regarding the proposed buffers until such time as a full review of the updated information has been undertaken.</p>

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		<p>of the European sites adjacent to the order limits?</p> <p>3. If it is the case that the areas are proposed to provide a buffer zone, then it is not specified whether this is a mitigation measure relied upon within the HRA report to exclude Adverse Effects on Integrity. Please could the applicant provide clarification?</p> <p>4. Additionally, the 0.53ha area does not appear to be clearly referenced on any of the accompanying figures, as the order limits appear to follow the boundary of the SPA/ SAC rather than overlapping. The applicant is requested to update all relevant examination documents to clarify the boundary of the proposed development in relation to the adjacent European sites. Natural England are also requested to provide any comments on the above matters.</p>	
Q2.0.36	Natural England	<p><b>Habitats Regulations Assessment - Qualifying features - Species within the assemblage - Humber Estuary SPA</b></p> <p>The applicants HRA [AS-004] includes an assessment of individual qualifying features and then individual species considered to be part of the Humber Estuary assemblage qualifying feature, with some species</p>	<p>Natural England does not have any outstanding concerns with the assessment the Applicant has undertaken to identify whether the site constitutes functionally linked land (FLL). The key issues in relation to FLL for the Humber Estuary SPA/Ramsar (as identified under references NE1–NE7 within our Relevant Representations) relate primarily to the design and functionality of the proposed mitigation areas for relevant qualifying species, including greylag goose, lapwing, mallard, pink-footed goose and golden plover. Natural England has requested that matters NE1–NE7 remain 'under</p>

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		<p>assessed both individually and as part of the assemblage.</p> <p>Can NE provide its position on whether all required species have been considered and have been assessed for the correct season and as individual or assemblage features, with reference to the latest available list of the assemblage component species if published?</p>	<p>discussion' within the Statement of Common Ground, as reflected in our comments to the Applicant dated 08 May 2026 (see above answer also).</p> <p>We note however, if required by Your Authority, that the most up-to-date list of assemblage component species is set out in Annex B: Humber Estuary Special Protection Area: non-breeding waterbird assemblage (Version 3, July 2025).</p> <p>Natural England will continue to engage constructively with the Applicant outside of the Examination process to seek resolution of these matters.</p>
Q2.0.37	Applicant and Natural England	<p><b>Habitats Regulations Assessment - Qualifying features - Species within the assemblage - Humber Estuary SPA</b></p> <p>The published datasheet for the Humber Estuary SPA includes wintering ringed plover, grey plover and sanderling. However, the HRA (predominately in Table 6-3) presents conclusion on these species in relation to being a component of the assemblage. Can the applicant and NE confirm if the conclusions are also considered to be relevant for these species as wintering qualifying features?</p>	<p>Natural England advises that assemblage features of the Humber Estuary need to be assessed in the way as other species listed in the SPA citation. the most up-to-date list of assemblage component species is set out in Annex B: Humber Estuary Special Protection Area: non-breeding waterbird assemblage.</p>
Q2.0.38	Applicant and Natural England	<p><b>Habitats Regulations Assessment - Qualifying features - Humber Estuary SPA</b></p> <p>Tables 6-1 and 6-2 of the HRA report [AS-004] present survey data for SPA qualifying</p>	<p>The most up-to-date list of assemblage component species is set out in Annex B: Humber Estuary Special Protection Area: non-breeding waterbird assemblage Species that form part of the assemblage qualification should be assessed the same as other species listed in the SPA citation. Pink footed</p>

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		<p>features and a number of additional species. Whilst an explanation is given for the inclusion of pink footed goose and greylag goose, no explanation appears to be given for the inclusion of green sandpiper, little egret, shoveler and common crane in these tables.</p> <p>To the applicant - Please provide the rationale for the inclusion of these species in the HRA when they are not listed or assessed as qualifying features?</p> <p>To Natural England - Please confirm if the other additional species presented in tables 6-1 and 6-2 are required to be included in the assessment of LSE and subsequently AEol if LSE are identified, and if so, why (with reference to the latest available list of the assemblage component species if published)?</p> <p>To Natural England - please confirm whether you agree with the applicant's inclusion of pink footed goose and greylag goose as qualifying features in the HRA report?</p>	<p>goose and greylag goose are species which are not listed on the SPA citation but occur at site levels of more than 1% of the national population according to the most recent Humber Estuary Wetland Bird Survey (WeBS) 5-year average count.</p>
Q2.0.48	Natural England	<b>Habitats Regulations Assessment - Screening conclusions</b>	<p>The assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur to the listed sites, either alone or in combination. On the basis of the information provided, including distance and no record of any significant</p>

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		<p>The Natural England relevant representation [RR-023] does not refer to the applicants' conclusions on:</p> <ul style="list-style-type: none"> <li>• Lower Derwent Valley SPA, Ramsar site and SAC</li> <li>• Skipwith Common SAC</li> <li>• River Derwent SAC</li> </ul> <p>Can NE confirm its position on these sites within the applicants HRA report [AS-004]?</p>	<p>numbers of the Lower Derwent SPA and Ramsar species utilising the Order Limits, Natural England concurs with this view.</p>
Q2.0.50	Natural England	<p><b>Habitats Regulations Assessment - Confirmation of international designated sites</b></p> <p>The Natural England relevant representation [RR-023] NE11 refers to the Thorne Moor SAC, however the commentary also refers to this entry being relevant to the Humber Estuary SPA. Can NE confirm which site(s) this entry relates to?</p>	<p>Natural England advises that this is currently relevant to both Thorne Moor SAC and the Humber Estuary SPA. This point remains under discussion as the Applicant is considering removing this parcel (M1(A)) from the mitigation strategy for the Humber Estuary SPA and further considering the next steps in managing this in relation to Thorne Moor SAC.</p>
Q2.0.51	Natural England	<p><b>Habitats Regulations Assessment - Confirmation of international designated sites</b></p> <p>The Natural England relevant representation [RR-023] NE12 and NE13 refers to the "Thorne and Hatfield Moors SAC". Can NE confirm whether these entries relate to one or both of the Thorne Moors SAC and Hatfield Moor SAC?</p>	<p>Natural England can confirm whether these entries relate to both of the Thorne Moors SAC and Hatfield Moor SAC</p> <p>The Applicant has provided further clarification in the draft SoCG on next steps. We advise that subject to these updates being provided we can agree these issues are resolved.</p>

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Q2.0.52	Natural England	<p><b>Habitats Regulations Assessment - Confirmation of international designated site</b></p> <p>The Natural England relevant representation [RR-023] NE15 to NE18 are all described as relating to potential water quality impacts during construction or operation. However, the ExA notes that NE15 and 16 refer to 6 sites, NE17 to 5 sites, and NE18 to 4 sites. Can NE confirm the rationale for the reduced number of sites in NE17 and then NE18 compared to NE15 and NE16?</p>	Natural England advises that the Humber Estuary SPA and Thorne and Hatfield Moors SPA should have been included NE17 and NE18
Q5.2.9	Applicant, CDC, NLC EA and NE.	<p><b>Draft DCO Schedule 2 Requirement 22 [AS-003]</b></p> <p>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?</p>	Natural England have not been consulted on this at time of writing. Due to capacity constraints, we request longer than this where possible.
Q9.0.1	Natural England and the Applicant	<p><b>Detailed ALC Survey</b></p> <p>Natural England's RR [RR-023] states in part:</p> <p>"Natural England re-iterate that a detailed ALC and soil survey of the agricultural land should be undertaken across the full Study Area. Our advice remains that this data</p>	<p>Natural England's rationale that a more detailed survey is required due to some of the land within the Order Limits have not had detailed ALC surveys completed.</p> <p>It is our advice that detailed surveys should be taken across the study area to inform decision making, however, we advise that it should be for the</p>

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		<p>should be provided prior to consent in order to inform decision making.”</p> <p>However, it is not clear whether this means that NE are not satisfied with the level of survey undertaken and presented at ES Appendix 15.1 – Agricultural Land Classification [APP-120]. Could NE please clarify and explain whether it is asserting that a more detailed survey is required and, if so, provide a rationale for this? Could the applicant also please provide its response? Within this context could the applicant explain what it means by ‘detailed or semi-detailed’ at ES paragraph 15.4.10 [APP-052]?</p>	<p>Examining Authority to determine whether the proposed approach is acceptable.</p>
Q9.0.17	NE, CDC and the Applicant	<p><b>Peatland</b> 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 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</p>	<p>Natural England notes that ES Chapter 14 (APP-051), in particular paragraphs 14.4.15–14.4.17, provides only a high-level and largely qualitative assessment of peat within the greenhouse gas (GHG) assessment. While the ES acknowledges that peat is present within the Order Limits and recognises its role as a carbon store, it concludes that these soils are degraded and under cultivation, and that construction disturbance would be comparable to routine agricultural activities, resulting in only limited additional emissions.</p> <p>Natural England considers that this conclusion is not sufficiently supported by robust, evidence-based analysis. In particular, the GHG assessment:</p> <ul style="list-style-type: none"> <li>• Does not clearly define the extent, depth or condition of peat soils within the Order Limits;</li> <li>• Does not quantify the volume of peat likely to be affected; and</li> </ul>

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		<p>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?</p>	<ul style="list-style-type: none"> <li>• Does not provide a quantitative assessment of potential carbon emissions arising from peat disturbance.</li> </ul> <p>This level of detail contrasts with the more structured and evidence-led approach applied elsewhere in the ES, including Chapter 15.</p> <p>Natural England further advises that the assumption of “cultivation-equivalent” disturbance is only partially substantiated and does not adequately reflect the range of construction activities proposed. While this assumption may be reasonable for solar panel installation, which involves limited ground disturbance, other elements of the Scheme, including BESS compounds, substations, access tracks and cable trenches will require deeper excavation, soil stripping and handling, with the potential to affect peat horizons.</p> <p>These activities may result in:</p> <ul style="list-style-type: none"> <li>• Localised excavation and temporary storage of soils;</li> <li>• Exposure of peat to aerobic conditions; and</li> <li>• Increased risk of peat oxidation and associated carbon release.</li> </ul> <p>In addition, Natural England considers that potential effects on peat should be assessed across all phases of development:</p> <ul style="list-style-type: none"> <li>• Construction: likely to result in the greatest impacts due to excavation, compaction and exposure;</li> <li>• Operation: potential indirect effects through changes in drainage and soil hydrology;</li> <li>• Decommissioning: further temporary disturbance, albeit with restoration.</li> </ul>

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			<p>ES Chapter 14 does not clearly differentiate these phase-specific effects, nor does it provide sufficient evidence to support the conclusion that emissions would not materially differ from the current baseline. The absence of quantified peat volumes and a distinction between temporary and permanent impacts further limits the robustness of the assessment.</p> <p>Accordingly, Natural England agrees with City of Doncaster Council that the current assessment is insufficiently robust, and that further work is required to align the GHG assessment with the level of detail applied in Chapter 15.</p> <p>This should include:</p> <ol style="list-style-type: none"> <li>1. Identification and quantification of peat soils within the Order Limits;</li> <li>2. Assessment of the depth and volume of peat likely to be affected by each construction activity;</li> <li>3. Quantification of associated carbon emissions; and</li> <li>4. A clear explanation of how impacts have been avoided, minimised and mitigated, including through the Soil Management Plan or Peat Management Plan.</li> </ol> <p>In respect of baseline conditions, Natural England notes that the ALC survey (ES Appendix 15.1 [APP-120]) confirms that peat is not present at the surface, but occurs at depth at a limited number of locations. Peat is typically encountered below the topsoil horizon (generally from approximately 50–60cm), although in some discrete locations (e.g. sample points 73–77 and 120) it is recorded from approximately 30cm below ground level. These horizons are variable and localised, and are generally overlain by mineral topsoil.</p> <p>While this indicates that peat is not extensive across the Order Limits, its presence at relatively shallow depth in places reinforces the need for a more</p>

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			<p>clearly defined and quantified assessment of potential disturbance and associated emissions.</p> <p>The <i>National Policy Statement for Renewable Energy Infrastructure (EN-3)</i> states that:</p> <p><i>2.10.26 Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This should be in line with the ambition set out in the Environmental Improvement Plan to bring at least 40% of England’s agricultural soils into sustainable management by 2028 and increase this up to 60% by 2030. This should include consideration of mitigation against impacts to peat soils where these are present.</i></p> <p><i>2.10.119 The Defra Construction code of practice for the sustainable use of soils on construction sites<sup>103</sup> provides guidance on ensuring that damage to soil during construction is mitigated and minimised. Mitigation measures focus on minimising damage to soil that remains in place, and minimising damage to soil being excavated and stockpiled. The measures aim to preserve soil health and soil structure to minimise soil carbon loss and maintain water infiltration and soil biodiversity. Mitigation measures for agricultural soils include use of green cover, multispecies cover crops - especially during the winter - minimising compaction and adding soil organic matter. Mitigation of impacts to peat soils should include water table management and minimising soil disturbance.</i></p>

