

Mr Luke Simpson
The Planning Inspectorate
Tween Bridge Solar Farm Case Team
c/o QUADIENT
69 Buckingham Avenue
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Interested Party ref: F1C2DDF91
Your ref: EN010148

Date: 30 June 2026

Order Granting Development Consent for Tween Bridge Solar Farm at Land either side of the M180, High Level Banks (the A18) and the Stainforth and Keadby Canal (EN010148)

Deadline 3: Representations on further information submitted at Deadline 2

Dear Sir

Pursuant to Deadline 3, the Environment Agency notes that the Examining Authority invites comments on any other submissions received at Deadline 2. Accordingly, we provide comments on those submissions relevant to the Environment Agency's remit together a summary of the current matters still under discussion with the Applicant.

1.0 3.1 Draft Development Consent Order (Rev 4) [[CR1-006/CR1-007](#)]

1.1 Part 4, Article 19, Discharge of water

We have no updates regarding our concerns raised on the addition of sub-paragraph (10) in our Deadline 2 Written Representations ([REP2-102](#)). We therefore maintain our position on this matter and request that the addition is removed.

1.2 Article 9 and Schedule 14, Part 5, For the protection of the Environment Agency

In our Deadline 2 Written Representations ([REP2-102](#)), we raised that the revised draft Development Consent Order (dDCO) included some additional wording beyond the Protective Provisions (PPs) agreed between ourselves and the Applicant. We have received further correspondence from the Applicant that the insertion will be removed in a revised version of the dDCO.

We welcome this and will be in a position to confirm that the PPs are agreed upon receipt of their submission.

1.3 Schedule 2, Part 1- request for additional Requirement- Land Contamination

We note the Applicants response to our request for the removal of paragraph (e) from Article 2 and that they maintain their position regarding our request for an additional Requirement in respect of land contamination ([REP2-088](#)).

We maintain our position regarding our request for an additional Requirement; however, we consider that a slightly different approach could be appropriate to strike a balance between flexibility and environmental protection. We have included further details on our updated position on this matter in our Deadline 3 Written Summary of Oral Representations submission.

1.4 Schedule 2, Part 1- request for additional Requirement- Piling Risk Assessment

Commitment 118 of the 7.10 Commitments Register (Rev 1) ([APP-185](#)) for a piling risk assessment is noted as being relevant to Pre-construction / Construction / Operation / Decommissioning phases. It is unclear whether the Applicant anticipates that a piling risk assessment may be required during construction, operation and decommissioning. We would welcome further clarification on when and under what circumstances the Applicant considers a piling risk assessment may be required, over the lifetime of development.

2.0 Book of Reference [[CR1-010/CR1-011](#)]

2.1 We are still in the process of carrying out assessments to understand the potential effects of the acquisitions sought by the Application. Please refer to our answer to ExQ1 Q4.0.9 for details on the issues we are currently considering on this matter.

3.0 Chapter 7: Ecology and Nature Conservation (Rev 3) [[REP2-035/REP2-036](#)]

3.1 We have reviewed the revised Chapter 7 of the Environmental Statement and can confirm that we are satisfied with the amendments made.

4.0 Chapter 10: Water Resources (Rev 2) [[REP2-021/REP2-022](#)]

4.1 We have reviewed the revised Water Resources Chapter. Paragraphs 10.5.11 and 10.5.22 provide further details of culverting proposed as part of

the scheme. The assessment outlines that it is proposed to culvert the North Soak Drain, which is considered to have a Moderate Adverse (significant) effect, due to the width of the river.

4.2 Culverting watercourses has the potential to cause adverse ecological, flood risk and geomorphological effects. NPS EN-3 outlines that culverting of watercourses should be avoided, The Policy outlines where it is unavoidable, then it should be demonstrated that no reasonable alternatives exist.

4.3 The ES does not provide demonstration that there are no reasonable alternatives to culverting the North Soak Drain and we request that this is considered further. We advise that reasonable alternatives should be considered for all culverts proposed to meet the requirements of NPS EN-3.

4.3 To avoid the potential impacts of culverts on watercourses, we would support the employment of clear span methods to prevent loss of habitat continuity in the river corridor where possible. We request that the option of clear span methods where culverts are proposed is considered further.

4.4 We note that the proposed culverting of the North Soak Drain does not appear to be shown on the Indicative Culvert Crossings Plan [[APP-138](#)]. If the Applicant cannot find a reasonable alternative to culverting the North Soak Drain then this plan should be updated to include its intended location.

4.5 Paragraph 10.3.38 of Chapter 10 refers to guidance on Culverts outlined in National Policy Statement (NPS) EN-3. The Environmental Statement references the outdated version of NPS EN-3, and we advise that the paragraph references are updated.

4.6 Any culverting of main rivers would also require approval from the Environment Agency under the Protective Provisions. We will normally only grant consent for such works if there is no reasonably practicable alternative, and we think the detrimental effects would be so minor that a more costly alternative would not be justified or there are reasons of overriding public or economic interest.

5.0 Flood Risk Assessment (Rev 3) [[REP2-047](#)/[REP2-049](#)/[REP2-051](#)]

5.1 We have reviewed the revised Flood Risk Assessment (FRA) in respect of the Battery Energy Storage System (BESS) proposals (revisions in relation to BESS were made at Deadline 1). Paragraph 7.26 of the FRA

outlines that *'The details of the below ground storage proposed are subject to detailed design. During detailed design, it will be ensured that the design is suitable to manage potentially contaminated fire water.'*

5.2 Considering that we are included as a specific consultee to Requirement 7 (Battery safety management plan) and Requirement 11 (Surface and foul water drainage), we are satisfied that we will have the opportunity to engage with the Applicant on the detailed design of the BESS development post-consent. We therefore wish to withdraw our previous objection on this matter.

6.0 **Outline Landscape Ecological Management Plan (Rev 4) [REP2-070/REP2-071]**

We have reviewed the amendments to the outline Landscape Ecological Management Plan. Overall, we are satisfied with the amendments made. We note that Table 4-1: Habitat Management by Type - Retained ditches and ponds on Page 20 states: *'Ongoing management will then comprise continued scrub control, sensitive dredging works and rotational management to ensure that entire lengths of ditch are affected at the same time.'* We understand that this paragraph is intended to state 'are not affected' and we advise that this is amended.

Summary

Our views are given without prejudice to any future detailed representations that we may make throughout the examination process. We reserve the right to add to or amend these representations, including requests for DCO Requirements, should further information be forthcoming during the examination on issues within our remit.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

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Sustainable Places Planning Advisor

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