

# Tween Bridge Solar Farm

## 8.19 Written Summary of Oral Submissions at the Open Floor Hearing 2

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

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# 1 Introduction

## 1.1. Introduction

- 1.2. This document summarises the oral submissions made on behalf of RWE Renewables UK Solar and Storage Limited (the **Applicant**) at Open Floor Hearing 2 (**OFH2**) on 24 June 2026 in relation to the Applicant's application for development consent for the Tween Bridge Solar Farm (the **Scheme**).
- 1.3. This document does not purport to summarise the oral submissions made by other parties at the OFH2 and references to submissions made by other parties are only included to give context to the Applicant's submissions in response.
- 1.4. The Applicant acknowledges that various matters were raised at the OFH2 by the Interested Parties in attendance and that the Applicant had an opportunity to respond at the end of the OFH2. This document summarises the Applicant's oral submissions at the OFH2.
- 1.5. Reflective of the Applicant's confirmation that a detailed response would be provided at Deadline 3, this document also includes post-hearing responses to some matters raised at the OFH2. Where the comment is a post-hearing comment submitted by the Applicant, this is indicated.
- 1.6. This document uses the headings for each item in the agenda published for OFH2 by the Examining Authority (**ExA**) on 4 June 2026 [**EV7-001**].

# 2 Agenda item 1 – Welcome, introductions and arrangements for the Hearing

- 2.1. The Applicant was represented at OFH2 by Tom McNamara (**TM**), TLT LLP, Legal Director.
- 2.2. The following Interested Parties were introduced:
  - Mr Paul Skelton representing North Lincolnshire Council (NLC); and Mr Andrew Sierakowski, representing City of Doncaster Council (CDC), together the Councils;

- Mr Michael Brooke, a local resident and a person with an interest in land affected by the Scheme; and
- Mr John Carr, a local resident and a person with an interest in land affected by the Scheme.

### **3 Agenda item 2 – Purpose of the Open Floor Hearing**

- 3.1. The Applicant did not make submissions on this agenda item.

### **4 Agenda item 3 – Oral submissions from Interested Parties**

- 4.1. Submissions were made by the Interested Parties to which the Applicant's responses are recorded below at agenda item 4.

### **5 Agenda item 4 – Responses by the Applicant**

- 5.1. TM provided responses to the submissions made by Interested Parties, noting that further detail would be provided where necessary in writing at Deadline 3.

**5.2. Mr Brooke:**

- 5.3. In response to Mr Brooke's submissions, the Applicant provided the following responses.

***Maintenance of the strip of land between panels and ditches***

- 5.4. In relation to the maintenance of land between solar panels and adjacent drainage features, TM confirmed that this matter was to be addressed under Action 14 arising from ISH3. The Applicant would provide a full written response in the **Written Summary of Oral Submissions for ISH3 [Document Reference 8.17 Revision 1]** at Deadline 3.

***Impact on local fuel pipeline***

- 5.5. In respect of potential impacts on the local fuel pipeline, TM explained that the pipeline was operated by Exolum Pipeline System, who have been actively engaged in the examination. The Applicant was progressing protective provisions within

Schedule 2 to the **Draft DCO [Document Reference 3.1 Revision 6]** to ensure that any interaction with the pipeline would be appropriately controlled and managed.

***Degradation of value of the land***

- 5.6. In response to concerns regarding the alleged degradation of agricultural land value, TM confirmed that the Applicant had not sought to underplay the agricultural value of the land. TM referred to **ES Chapter 9 Ground Conditions [Document Reference 6.2.9 Revision 2]** and **ES Chapter 15 Agricultural Circumstances [Document Reference 6.2.15 Revision 2]**, which assessed agricultural land classification and identified the extent of best and most versatile land within the Order Limits. TM noted that, amongst other things, the planning balance requires consideration of whether any impacts on such land are outweighed by the benefits of the Scheme.

***Crime***

- 5.7. In respect of concerns regarding crime associated with the Scheme, TM referred to the Applicant's previous position at ISH1 found in the Applicant's **Written Summary of Oral Submissions at OFH1 [REP1-045]**, which provided an explanation of the Applicant's position and the measures proposed (see para 5.9 of that document).

***Sheep welfare***

- 5.8. In relation to animal welfare, including the grazing of sheep, TM confirmed that a further written response would be provided to Mr Brooke as part of the Applicant's summary of oral submissions, addressing how this matter would be managed and monitored.
- 5.9. **Action 1: The Applicant agreed to respond in writing to Mr Brooke in respect of his concerns on grazing sheep amongst the solar panels.**
- 5.10. **Post hearing note: The co-location of solar panels and sheep grazing is a well-established practice and widely adopted approach across the UK. Sheep are particularly well suited to grazing beneath and between solar panels due to their size and grazing behaviour. The solar panels and associated infrastructure are considered not to be damaged by or to harm the livestock. Their presence helps maintain vegetation at an appropriate height, reducing the need for mechanical**

**cutting and thereby supporting a low-impact, sustainable land management regime. This approach can also deliver ecological benefits by promoting a more diverse sward structure compared to intensive agricultural practices.**

Regarding livestock safety and containment, the proposed security fencing around the solar development serves a dual purpose. In addition to providing site security, it ensures that grazing livestock are safely enclosed within a controlled environment. This prevents animals straying onto adjacent land or highway and protects them from potential external risks. The fencing design is typically agreed to ensure it is robust, appropriate for agricultural use, and compatible with ongoing farm management practices.

The Scheme does not confirm that sheep grazing will, or must, operate alongside the solar farm. The conclusions of the planning balance exercise do not rely on sheep grazing to operate to make the development acceptable. However, this is a potential opportunity to continue agricultural practices at the same time as generating renewable energy.

If sheep grazing does take place within the Scheme, the developer will have a separate grazing agreement with any associated sheep farmers. Any sheep grazing will have to comply with the controls set out in the management plans, including the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 4] and Outline Operational Environmental Management Plan [REP2-064], which are secured as part of the Draft DCO [Document Reference 3.1 Revision 6].

***Regrowth of habitats:***

- 5.11. In respect of habitat management, TM confirmed that ecological measures would be secured through the **Outline Landscape Ecological Management Plan (LEMP) [CR1-021]**, including measures to be implemented following construction. TM also noted that a Decommissioning Environmental Management Plan (DEMP) would be required at the end of the operational period, including provisions for habitat restoration, subject to approval by the local planning authority.

***Import of materials:***

5.12. In response to queries regarding the origin of materials for the Scheme, TM explained that procurement processes were not finalised at the current stage, but confirmed that further information could be provided in writing where possible.

5.13. **Action 2: The Applicant agreed to respond in writing regarding the sourcing of infrastructure and materials for the Scheme.**

**Post-hearing note: The Climate section of Table 5-1 of the Outline Construction Environmental Management Plan [Document Reference 7.1 Revision 4] (page 51) commits the Applicant to using local suppliers, recycled products, and products and services with a low carbon footprint where possible. In practical terms, access tracks, fencing, civil works such as concrete aggregate, and landscaping should be capable of being sourced locally. On existing projects in construction or operation, the Applicant has been able to source mounting structures for fixed solar PV modules from the UK. It is not yet known whether this will be possible for the Scheme as this decision would be made post consent.**

**Section 5.2 of the Outline Supply Chain, Employment and Skills Plan [REP1-037] sets out the opportunities the Applicant would seek to maximise for local employment and training.**

***Comments by another impacted landowner regarding quality of land put into the Scheme***

5.14. In relation to comments attributed to other landowners regarding land quality, TM confirmed that it would not be appropriate to comment on third-party views, but reiterated that a detailed site selection process had been undertaken and that the chosen site was concluded to be suitable and appropriate for the Scheme.

***Farmsteads experiencing views from the Scheme***

5.15. In response to concerns regarding visual effects on farmsteads, TM referred to **ES Appendix 6.2 (Residential Visual Amenity Assessment (RVAA) [APP-062])**. TM clarified that it was not the case that other properties would not experience views of the Scheme, as set out in the RVAA.

***Free passage of wildlife***

5.16. In respect of wildlife movement, TM referred to the **Outline Operational Environmental Management Plan [REP2-064]**, noting that measures such as mammal gates and clearance beneath fencing would be included to facilitate the free passage of wildlife. TM confirmed that these measures were secured through the relevant outline control plans submitted with the application and would therefore constitute legally binding obligations on the Applicant.

5.17. **Mr Carr:**

***Concerns about Applicant's consultation and engagement***

5.18. In relation to concerns regarding engagement, TM refuted the suggestion of inadequate consultation. TM referred to the **Consultation Report [APP-022]**, which demonstrated the extent of engagement undertaken, and explained that changes to the Scheme had been informed by feedback received from landowners and local residents.

5.19. **Action 3: The Applicant agreed to provide a written summary of engagement undertaken with Mr Carr.**

5.20. **Post-hearing note: Details of the Applicant's non-statutory and statutory consultation is provided in the Consultation Report [APP-022]. This includes details of the consultation materials and publications regarding the Scheme coming forward. Letters were sent to Mr Carr's property advising of the proposals and the ways in which stakeholders could provide feedback on the Scheme. Mr Carr attended a public consultation event in October 2023 and completed the consultation survey. Mr Carr's responses informed the evolution of the Scheme's design. Section 4 of the Consultation Report [APP-022] provides the summary of responses received during the non-statutory consultation (October – November 2025) and Section 8, a summary of responses received during the statutory consultation (March – May 2025). Mr Carr's statutory consultation response can be found in Appendix 4.5 of the Consultation Report [APP-025], under s42(1)(d) PILs Feedback from p142, with Applicant's response in the table.**

**Mr Carr issued a further objection to the proposals via email in January 2024 and noted he had identified a design solution which he wanted to discuss further. A sketch was issued to the Applicant in January 2024 identifying fields that he would like infrastructure removed from, to the north, east and south of**

his property. A representative from the Applicant's Landscape Consultants visited Mr Carr's property on 7 February 2024 to discuss the proposals and assessed the Scheme's impact on his residential property.

The Applicant amended the Scheme, following a design workshop after the statutory consultation period and prior to submission, to increase the offset from his property in the direction of north, east and south. The Landscape and Visual Mitigation Strategy [Document Reference 6.4.6.4 Revision 4] was updated, to bolster the proposed planting, by increasing screening with additional 6m planting buffers and new hedges, to reduce the visibility of the Scheme.

***Fire safety risk***

- 5.21. In response to fire safety concerns, TM explained that emergency procedures would be secured through the **Outline Operational Environmental Management Plan [REP2-O64]**. This included (at section 4.8) the preparation of an Emergency Response Plan, an Emergency Spillage Action Plan, and a Health and Safety Plan, all to be developed in consultation with the relevant authorities. TM further noted that a Statement of Common Ground had been agreed with South Yorkshire Fire and Rescue Service, the latest iteration of which was to be submitted at Deadline 3 [Document Reference 9.13 Revision 2] and would show that all matters are now agreed.

***Overplanting***

- 5.22. In response to concerns around overplanting of solar panels, TM referred to Action 13 arising from ISH3, confirming that the Applicant would provide justification for overplanting including policy support and comparison with other made solar DCOs, in the **Written Summary of Oral Submissions for ISH3 at Deadline 3 [Document Reference 8.17 Revision 1]** as part of action 13.

***Biodiversity***

- 5.23. In response to concerns regarding the scale of land use relative to energy output, TM noted that the Scheme represented a significant contribution to national energy policy objectives, including net zero targets, and would be capable of supplying electricity to a substantial number of homes.

***Origin of panels, inverters and cabling***

- 5.24. In relation to the origin of panels, inverters and cabling, TM confirmed that procurement decisions would be made at the implementation stage, but agreed that a written response would be provided to Mr Carr as part of the Written Summary of Oral Submissions at OFH2.
- 5.25. **Action 4: The Applicant agreed to provide a written response regarding the sourcing of panels, inverters and cabling.**
- 5.26. **Post-hearing note: The Applicant acknowledges that the majority the solar PV modules would be sourced from China due to its dominance in manufacturing these components. The Applicant considers that its membership of the Solar Stewardship Initiative, and signatory to the United Nations Global Compact, as well as policies against unethical supply chains and forced labour demonstrate its committing to best practice procurement and supply chain management. Clauses would be written into delivery and procurement contracts to ensure all contractors and subcontractors are compliant with these policies.**

**The Applicant's existing projects under construction or in operation were able to source inverters and cabling from European suppliers. It is not yet known whether with this will be the case for the Scheme, as this would be established post-consent, subject to the Applicant's procurement policies as referred to above.**

### ***Comment on EDF's recent comments***

- 5.27. In response to references to external comments on electricity demand by EDF, TM confirmed that the application would be determined in accordance with the National Policy Statements, which identify solar development as a Critical National Priority.
- 5.28. The ExA asked further questions arising from the submissions made.
- 5.29. In response to a query regarding sheep grazing, TM confirmed that it was not a legally binding requirement of the **Draft DCO [Document Reference 3.1 Revision 6]** to make land available for sheep grazing, and noted that the Applicant was not relying on sheep grazing as a benefit of the Scheme.
- 5.30. The ExA drew attention to ES Appendix 6.2 (RVAA), and in particular the assessment of certain residential receptors (including properties 32 and 44), which have been identified as experiencing moderate to significant effects at

Year 1, reducing over time. The ExA suggested that further consideration be given to whether design changes or additional mitigation could reduce these effects, particularly in respect of property 44.

- 5.31. TM confirmed that the Applicant would consider this matter further and provide a response in writing.
- 5.32. Action 5: The Applicant agreed to review the panel layout in the vicinity of property 44 and consider whether amendments could be made to reduce visual effects.**
- 5.33. Post-hearing note: The Applicant is reviewing this request with its technical team and will provide an update at Deadline 4. The Applicant is reviewing adjustments to the layout, including the potential removal or rearrangement of panels in this location.**
- 5.34. The ExA invited any further submissions from Interested Parties.

### ***Further submissions***

- 5.35. Mr Brooke made further submissions, reiterating concerns regarding the alleged degradation of land value, the local pump rationalisation proposals, the proposed use of the Site for sheep grazing, and queried whether a 6-metre buffer would be maintained either side of the Exolum pipeline.
- 5.36. Mr Carr made further submissions seeking clarification of consultation undertaken (including the timing and location of events) and clarified that his position is that panels could be moved, rather than removed, in the vicinity of his property.

### ***Applicant's Response***

- 5.37. TM provided further responses to the matters raised by Mr Brooke and Mr Carr.
- 5.38. In response to Mr Brooke's further submissions:
- (a) TM reiterated that the Applicant did not accept that the Scheme degrades or devalues agricultural land, noting that detailed and transparent assessments of soil quality and agricultural land classification had been undertaken as part of the Environmental Statement;

(b) in relation to the Exolum pipeline, TM confirmed that appropriate clearance and protection measures would be secured through the protective provisions in the **Draft DCO [Document Reference 3.1 Revision 6]**. TM noted that, where applicable, a minimum buffer (which would account for the requested 6 metre clearance) would be observed in accordance with the requirements of the protective provisions for the pipeline operator and any works within that zone would be subject to the oversight of Exolum and to compliance with Exolum's reasonable conditions; and

(c) in respect of concerns regarding the pump rationalisation project, TM confirmed that this matter had been addressed previously (including in the **Written Summary of Oral Submissions for ISH1 [REP1-046]**) and that the Scheme did not interact with or affect that separate project.

- 5.39.** In response to Mr Carr's further submissions, TM acknowledged the clarification provided and confirmed that the Applicant understood the request relating to the potential re-siting, rather than removal, of panels in proximity to residential receptors. A response on this point would be provided as part of Action 5. TM also reiterated that, under Action 4, the Applicant would provide a written summary of engagement undertaken with Mr Carr.

## 6 Agenda item 5 – Close of Hearing

- 6.1. The ExA closed the OFH2.