

Date: 21 July 2026
Our ref: 553746
Your ref: EN010148



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Dear Inspector,

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

Natural England's response to the Examining Authority's (ExA's) second written questions (ExQ2) with a deadline of 21 July 2026.

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 Laura Tyndall at [\[REDACTED\]@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk) and copy to consultations@naturalengland.org.uk.

Yours faithfully,

Laura Tyndall
Yorkshire and Northern Lincolnshire Area Team
Natural England

1. Natural England's response to the Examining Authority's (ExA's) second written questions (ExQ2)

Table A: Natural England's response to ExQ2 (Issued on 07 July 2026)			
ExA question ref	Question addressed to	Question	Answer
Q2.2.7	Natural England	Additional impact pathways requiring consideration: The ExA notes that the NE relevant representation [RR-023] and subsequent risks and issues log [REP3-075] refers to the following potential additional impact pathways: NE0 - Direct loss / damage of habitat NE3 - Collision risk with turbines due to displacement (from nesting / foraging sites) NE5 - Recreational disturbance from new permissive paths NE8a - Collision risk with solar panels. Can NE confirm: - whether it considers that these are impact pathways which have the potential to result in Likely Significant Effects (LSE) (and / or Adverse Effects on Integrity (AEoI)) - whether these are required to be assessed within the applicants HRA Report [CR1-012]? - which European sites and qualifying features do the impact	Natural England's Relevant Representation [RR-023] included the impact pathways referenced, and we confirm these are not additional to our Deadline 3 response [REP3-075]. These have either already been under discussion with the Applicant and/or already assessed in the HRA. For key issue NE0, following REP3-075, we await clarification from the Applicant at Deadline 4 as to how exceptions to works within the designated site (Thorne Moor SAC; of which 0.54ha is within the DCO limits) are planned to be agreed with the Ecological Clerk of Works to ensure that impacts to the designated site are avoided. We consider this a matter of clarification at this stage as to how damaging works will be avoided, and how this will be secured. We consider the Applicant is committed to avoiding works within the designated site. We consider adverse effects are unlikely if this can be effectively secured. For key issues NE3 and NE5, REP3-075 confirms that the new overarching issue NE1a now comprises all updated advice for previous sections NE1 - NE6, as these all relate to the proposed mitigation strategy for loss of FLL for the Humber Estuary SPA/Ramsar. These were amalgamated into one key issue for ease moving forward in the Examination. We consider adverse effects are unlikely but require this further assessment/information in relation to the mitigation strategy to determine this. It is our understanding that the Applicant is submitting further information around NE1a at Deadline 4. For key issue NE8a (Thorne and Hatfield Moors SPA) we have highlighted in REP3-075 that in addition to operational monitoring of disruption to nightjar flight pathways and bird collisions, we advise that details of the remedial measures to be undertaken, should be outlined in the oLEMP. We consider adverse effects

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		pathways have the potential to effect?	are unlikely but require this further assessment in the HRA to determine this. It is our understanding that the Applicant is submitting further information around NE8a at Deadline 4.
Q2.2.8	Applicant and NE (and any other interested parties)	Amendments to mitigation area M1(A) as a result of change request 1: The ExA notes that part of change request 1 is to amend the layout of mitigation area M1(A) to be able to construct and fence off the permissive path (by avoiding common land). Can the applicant and NE (and any other interested parties) confirm their position on any HRA implications of the altered layout and size of the mitigation parcel, or the requirement for additional construction works (fence installation)?	We have no specific comments to make on the change request in terms of the size of this mitigation parcel, however, we are currently awaiting further information on the mitigation strategy as a whole, as detailed in NE1a of REP3-075. The Applicant has outlined in the latest HRA that they do not consider M1(A) a 'core' part of the mitigation strategy due to size and proximity to operational wind turbines. We have made comments on the permissive footpaths in mitigation area in NE1a (page 9) of REP3-075. We are waiting for additional information to inform the HRA, however, we consider it unlikely there will be adverse effects from this element but require the additional information to make a conclusion. We have replicated the comments below for reference: <i>'We acknowledge that the Applicant is not considering parcel M1a as a 'core' aspect of the non-breeding bird mitigation strategy (as per information in section 2 of the oNBBMS). However, we note that additional information has been provided in the oNBBMS and oLEMP in relation to management of this parcel for the benefit of SPA birds and the incorporated permissive footpath.</i> <i>We also note the recent non-material change (accepted into Examination on 16 June 2026) has also reduced the size of this parcel due to the presence of adjacent registered common land and Countryside and Rights of Way Act 2000 access land. We note that this parcel continues to include a permissive footpath and welcome that some additional information has been provided in relation to this, including that this will be mown and fenced. We advise that further</i>

Table A: Natural England's response to ExQ2 (Issued on 07 July 2026)

ExA question ref	Question addressed to	Question	Answer
			<i>information should be provided as to whether positive signage will also be considered, as detailed in our relevant representation's response.</i> <i>If the parcel is managed for non-breeding SPA birds, the footpath should be well-screened to reduce disturbance. We advise further detail on the fencing/screening to be used is provided, and whether this will be effective. We would also recommend that consideration is given to the location of the footpath if possible. For example, is there any potential for the path be re-routed to the edge of the parcel.'</i>
Q2.2.11	NE and all interested parties	Revised HRA assessment in the sensitivity test To assess the implications of a revised construction period and connection date, the applicant has provided a sensitivity test report [REP2-091] which includes an assessment of the HRA conclusions. NE and all interested parties are invited to provide comments on the HRA implications of the conclusions of the sensitivity report.	We acknowledge the assessment of the implications of a revised construction period and connection date carried out by the Applicant in the sensitivity test report [REP2-091] sections 5.2 and 6.2. In terms of HRA implications, we broadly agree with the conclusions drawn, however, whilst it is clear which protected species surveys will be carried out, it is not clear how assessment of the pre-construction baseline will be gathered for impacts on Humber Estuary SPA/Ramsar birds. With later construction start dates, the wintering/passage bird surveys to inform the baseline become increasingly out of date. We would suggest, at a minimum, commitment to complete a desk study and walkover survey prior to construction to determine if habitat suitability has increased for SPA/Ramsar birds. We advise overall that any re-assessment of the ecological baseline conditions should be to determine if any <u>additional</u> ecological mitigation is required beyond that already specified in the outline Landscape and Ecological Management Plan (oLEMP) (and any other relevant environmental documents). We also highlight that the in-combination assessment for impacts on designated sites will be made with less confidence as a result of the proposed delayed construction period. However, we acknowledge that any future applications

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ExA question ref	Question addressed to	Question	Answer
			coming into the planning/ permitting system will have to make their own assessment with the Tween Bridge Solar Farm as an in-combination/ cumulative project. In relation to protected species, we welcome the requirement for updated ecological surveys to be undertaken prior to construction to ensure mitigation measures are informed by the most up-to-date baseline conditions (as outlined in the conclusions for both Sensitivity Test 1 (5.2.29) and Sensitivity Test 2 (6.2.27)). We also direct the Applicant to our advice in key issues NE23a-NE23f of our REP3-075 for recommendations around pre-construction/commencement surveys for each of the relevant protected species.
Q2.2.14	NE	Current position on AEol The ExA notes NE's comments in the SOCG [REP2-095] that it is not currently in a position to agree that there would be no AEol. Can NE provide its current position on where AEol cannot be ruled out (ideally in tabular form with reference to sites, project phase, impact pathways (alone and in combination) and qualifying features)? If AEol cannot be ruled out, then please explain in detail why and what the applicant could do within the remaining examination time to resolve this.	Natural England is not currently in a position to agree that there would be no AEol as we are currently awaiting additional information. We consider all issues outstanding to be 'amber' issues, for which further information is required to determine the impacts of the project. Natural England has been in regular discussion with the Applicant to continue the progression of these issues and we are confident these can be resolved with continued engagement. We also note that, based on discussions in our latest meeting with the Applicant on 09 July 2026, that they intend to submit updated documents at Deadline 4 to address the outstanding issues NE summarised at Deadline 3. We will be able to re-assess the status of the issues following these submissions. Please refer to Table B for a summary of our current position on AEol (as at 21 July 2026) based on the issues outlined in REP3-075. At this stage, we also consider that issues NE14, NE15, NE17 and NE18, generally speaking, require minor clarifications to conclude that impacts will be avoided/mitigated.

Table A: Natural England's response to ExQ2 (Issued on 07 July 2026)

ExA question ref	Question addressed to	Question	Answer
			Please note that the pathways detailed in Table B refer to '<u>alone</u>' impacts. We have requested the following information from the Applicant with regards to in-combination impacts (refer to NE19 of REP3-075): <i>'We welcome the addition of the in-combination assessment table in Appendix 6 in the HRA. We would advise, however, that a written summary is also provided highlighting the key points and providing a conclusion on in-combination impacts. It remains our advice that for impact pathways taken through to appropriate assessment, detailed in combination assessment should be made at this stage also.</i> <i>In relation to in-combination impacts on functionally linked land, please note that impacts of the project 'alone' are still under discussion. We can provide further comments on the in-combination assessment, once the additional assessment of impacts of the project alone is complete.</i> <i>We previously advised that mitigation area M15 is within relatively close proximity to the proposed North Humber to High Marnham overhead powerline development. We welcome that potential in-combination impacts have been assessed for this, and concur that based on the information provided in pages 117-118, that in-combination impacts can be ruled out.'</i>

Table B – NE’s current position (as at 21 July 2026) on Adverse Effects on Integrity (AEI) as requested in Q2.2.14

Note: The colour coding in Table B aligns with our standard coding for key issues tables as per our Relevant Representation [RR-023] and Deadline 3 [REP3-075] responses, and is replicated here as follows:

- **Amber** are those where further information is required to determine the impacts of the project and allow the Examining Authority to properly undertake its task and/or where further information is required on mitigation/compensation proposals in order to provide a sufficient degree of confidence as to their efficacy.
- **Yellow** are those where Natural England does not agree with the Applicant’s position or approach. We would ideally like this to be addressed but are satisfied that for this particular project it is unlikely to make a material difference to our advice or the outcome of the decision-making process. However, we reserve the right to revise our opinion should further evidence be presented. It should be noted by interested parties that whilst these issues/comments are not raised as significant concerns in this instance, it should not be understood or inferred that Natural England would be of the same view in other cases or circumstances.
- **Green** are those which have been successfully resolved (subject always to the appropriate requirements being adequately secured).

Site name & relevant features	Impact pathway	Project phase(s)	NE’s current position
Humber Estuary Special Area of Conservation (SAC) See Designated Sites View for feature list	Potential water quality impacts - General	Construction	Awaiting further information to determine AEI. Please refer to NE15 of REP3-075 for details of outstanding information. Minor clarifications required to conclude that impacts will be avoided.
	Potential water quality impacts - Firefighting water runoff	Operation	Awaiting further information to determine AEI. Please refer to NE18 of REP3-075 for details of outstanding information. Minor clarifications required to conclude that impacts will be avoided.
Humber Estuary Special Protection Area (SPA) and Ramsar Lapwing Pink-footed goose Mallard Greylag goose Golden plover	Loss of functionally linked land (FLL) for the relevant qualifying bird features	Construction and Operation	Awaiting further information to determine AEI. Please refer to NE1a of REP3-075 for details of outstanding information.
	Potential noise and visual disturbance impacts to functionally linked land for relevant qualifying bird features	Construction	Awaiting further information to determine AEI. Please refer to NE7 of REP3-075 for details of outstanding information.

Thorne Moor SAC <i>(Note: see row below for impacts that apply to <u>both</u> Thorne Moor SAC and Hatfield Moor SAC)</i> Degraded raised bogs (still capable of natural regeneration)	Potential loss/ damage to designated habitats	Construction and Operation	Awaiting further information to determine AEOI. Please refer to NE0 of REP3-075 for details of outstanding information.
	Hydrological impacts to SAC features	Construction and Operation	No AEOI. In NE11 of REP3-075 we highlighted that the management prescriptions in the oLEMP to manage the site as grassland do not conflict with managing impacts to, and allowing for potential future enhancements of, the hydrology of Thorne Moor SAC. Therefore, in relation to hydrological impacts to SAC features, we advise that this aspect of the issue is resolved, however, we have kept the issue 'live' due to ongoing discussions about the feasibility of transferring management to NE.
	Dust impacts on SAC features	Construction	No AEOI with mitigation measures. Please refer to NE12 of REP3-075 for details.
Thorne Moor SAC & Hatfield Moor SAC Degraded raised bogs (still capable of natural regeneration)	Air quality impacts to SAC features	Construction	N/A – NE no longer able to provide bespoke air quality advice on this Application. Please refer to NE13 of D3 response for details.
	Potential abstraction impacts resulting from Horizontal Directional drilling (HDD)	Construction	No AEOI. Applicant confirmed in latest SoCG that water is to be sourced offsite. Subject to no water abstraction as part of the directional drilling from the ditch network within the Order Limits being secured through the DCO (via the secured ECMP), this has moved to resolved ('green') from this deadline onwards.
	Potential water quality impacts - General	Construction	Awaiting further information to determine AEOI. Please refer to NE15 of REP3-075 for details of outstanding information. Minor clarifications required to conclude that impacts will be avoided.
	Potential water quality impacts – Bentonite breakout	Construction	No AEOI with mitigation measures. Please refer to NE16 of REP3-075 for details.

	Potential water quality impacts - Cleaning of solar PV modules	Operation	Awaiting further information to determine AEOI. Please refer to NE17 of REP3-075 for details of outstanding information. Minor clarifications required to conclude that impacts will be avoided.
	Potential water quality impacts - Firefighting water runoff	Operation	Awaiting further information to determine AEOI. Please refer to NE18 of REP3-075 for details of outstanding information. Minor clarifications required to conclude that impacts will be avoided.
Thorne and Hatfield Moors SPA Nightjar	Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA/Ramsar sites (nightjar).	Construction and Operation	Awaiting further information to determine AEOI. Please refer to NE8 of REP3-075 for details of outstanding information.
	Potential collision risk for nightjar using FLL.	Operation	Awaiting further information to determine AEOI. Please refer to NE8a of REP3-075 for details of outstanding information.
	Potential noise and visual disturbance impacts to qualifying bird features of the listed SPA site (nightjar).	Construction	Awaiting further information to determine AEOI. Please refer to NE9 of REP3-075 for details of outstanding information.
	Potential lighting impacts to qualifying bird features of the listed SPA site (nightjar).	Construction and Operation	No AEOI with mitigation measures. Please refer to NE10 of REP3-075 for details.
	Potential abstraction impacts resulting from Horizontal Directional Drilling (HDD)	Construction	No AEOI. Applicant confirmed in latest SoCG that water is to be sourced offsite. Subject to no water abstraction as part of the directional drilling from the ditch network within the Order Limits being secured through the DCO (via the secured ECMP), this has moved to resolved ('green') from this deadline onwards.

	Potential water quality impacts - General	Construction	Awaiting further information to determine AEOL. Please refer to NE15 of REP3-075 for details of outstanding information. Minor clarifications required to conclude that impacts will be avoided.
	Potential water quality impacts - Cleaning of solar PV modules	Operation	Awaiting further information to determine AEOL. Please refer to NE17 of REP3-075 for details of outstanding information. Minor clarifications required to conclude that impacts will be avoided.