Tween Bridge Solar Farm

9.6 Statement of Common Ground with Lincolnshire Wildlife Trust

Deadline ~~1~~ 6 ~~May~~ September 2026

Document Reference: 9.~~5~~6

Revision ~~1~~2

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2 Introduction

2.1. Purpose of this document

2.1.1. This Statement of Common Ground (hereafter referred to as the 'SoCG') has been prepared to support the Examination of the Development Consent Order (DCO) application (the 'DCO Application') for Tween Bridge Solar Farm (the 'Scheme').

2.1.2. The DCO Application is for a Nationally Significant Infrastructure Project (NSIP) for the construction, operation (including maintenance) and decommissioning of a solar photovoltaic (PV) array electricity generating facility, Battery Energy Storage System (BESS) and associated infrastructure which would allow for the generation and export of electricity.

2.1.3. The SoCG is a 'live' document that has been prepared by the Applicant and Lincolnshire Wildlife Trust.

2.1.4. The SoCG has been prepared in accordance with the Guidance for examination of DCO applications which was published in 2024 by the Department for Levelling Up, Housing and Communities[1].

2.1.5. This Guidance comments that:

"A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree, or indeed disagree. A SoCG helps to ensure that the evidence at examination focuses on the material differences between the main parties and therefore makes best use of the lines of questioning pursued by the Examining Authority'.

2.1.6. The aim of this SoCG is to therefore provide a clear position of the progress and agreement made or not yet made between the Applicant and the Lincolnshire Wildlife Trust on matters relating to the Scheme. Where matters are yet to be agreed, the parties will continue to proactively work to reach agreement.

2.1.7. The SoCG will be updated as more information becomes available and as a result of ongoing discussions between the Applicant and the Lincolnshire Wildlife Trust.

1 Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (April 2024)

2.2. Parties to this Statement of Common Ground

2.2.1. This SoCG has been prepared by (1) the Applicant and (2) the Lincolnshire Wildlife Trust.

2.2.2. The Lincolnshire Wildlife Trust is a conservation charity in the county with a strategic remit to support conservation of the natural world, lead on the recovery of key habitats and species, and empower local communities to take action for nature. The Lincolnshire Wildlife Trust is supported by over 27,000 members across Lincolnshire. The Trust [Hereafter] is also neighbouring land owner with property and access rights abounding areas of the proposed development.

2.2.3. Collectively, the Applicant and the Lincolnshire Wildlife Trust are referred to as 'the parties'.

2.3. Terminology

2.3.1. Section 3 of this document sets out the relevant matters raised though discussion between the parties. It provides a summary of the position of each party and identifies the status of discussions on each matter:

2.3.2. "Agreed" indicates where the issue has been resolved between the parties and is not anticipated to be subject to further discussions;

2.3.3. "Under discussion" indicates where a matter remains in active dialogue between the parties and a final position has not been reached;

2.3.4. "Not Agreed" indicates where the parties have established a final position that they cannot resolve the matter and will remain a point of difference.

3 Record of Engagement

3.1. Summary of consultation and engagement

3.1.1. The parties have been engaged in consultation and engagement throughout the development of the Scheme. Table 2-1 shows a summary of the meetings and correspondence that has taken place between the Applicant and the Lincolnshire Wildlife Trust in relation to the Scheme.

Table 2-1: Record of Engagement

Table 2-1 – Record of Engagement since 2023		
Date	**Method**	**Purpose / Description**
31 January 2023 onwards	DCO Consultation	The Scheme has been through the pre-application and acceptance process where the details of the scheme have been made publicly available for comments from interested parties.
11 December 2023	Letter	Lincolnshire Wildlife Trust submitted a letter in response to the non-statutory consultation, requesting engagement and to register as an interested party / neighbouring landowner, identifying a primary contact for all correspondence (Dr J Wood).
08.04.2024	Email	LWT emailed request for engagement, identifying no acknowledgement or response to letter of representation submitted in Dec 23.
08.04.2024	Email	Email response from Tween Bridge public relations team acknowledging receipt and confirming request for engagement had been raised with the project team.
20 March 2025	Formal Consultation	The Applicant submitted a hardcopy letter addressed to LWTs Chief Executives PA detailing the pre-submission statutory consultation. No response was received during the consultation period.

		(No contact or material was sent by ~~TBSF~~The Applicant to the primary planning contact)
15.07.25	Email	Lincolnshire Wildlife Trust contacted the Applicant to advise they intended to provide a formal written response outside of the consultation deadline.
28.07.25	Email	Email response from The Applicant to LWT confirming that the statutory consultation was closed, that the DCO application would be submitted within July, and the next opportunity for comment and engagement would be through formal examination.
02.01.26	Online	LWT submit relevant representation at DCO registration comments stage.
12.02.26	Email	The Applicant contacted the Lincolnshire Wildlife Trust to arrange a meeting following the receipt of their Relevant Representation.
16.02.26	Email	The Applicant confirmed a meeting time and sent a meeting request to the Lincolnshire Wildlife Trust for the 02 March 2026.
18.02.26	Email	The Applicant confirmed the meeting time and asked the Lincolnshire Wildlife Trust if prior to the meeting, they can provide any information regarding whether the Wildlife Trust can provide mitigation land for skylark.
23.02.26	Email	The Lincolnshire Wildlife Trust respond to the mitigation land skylark query and asked for the number of skylark plots required to be confirmed and stated that this was something that they regularly support
23.02.26	Email	The Applicant thanked the Lincolnshire Wildlife Trust for their response and their confirmation that they regularly support the provision of skylark mitigation land. The Applicant stated that the exact extent of

		mitigation and numbers of skylark requiring mitigation was to be confirmed.
02.03.26	Online Meeting	Meeting to discuss the Relevant Representation response Lincolnshire Wildlife Trust's consultation response Relevant points raised; i. Key concern over lack of engagement and no response to multiple requests to discuss Trust concerns over the project and proximity to our property and SSSI. ii. Further detail requested on invertebrate surveys and transect locations iii. Concerns over the boundary treatments and proximity to Crowle Moor SSSI, requesting more granular detail and design. iv. Highlighted the importance of the Warpings fields, both from a hydrological connectivity perspective and water table function to the SSSI, and also as a consequence the importance of wet grassland invertebrates for prey availability supporting high numbers of protected bird species. v. The identification of significant bird counts in proximity to Area B, and lack of appropriately positioned mitigation for Lapwing and PFG. vi. Impacts to Nightjars in terms of breeding sites and usage of wetland grass areas for foraging and commuting. Impacts and displacement of skylarks, mitigation requirements and compensatory plot ratios.
18.03.26	Email	LWT – email follow up requesting meeting minutes and additional documents Discussion point vi. reiterated concerns over nightjar impacts with data deficiencies for foraging and

		commuting extents and degree of usage of the applicants development site. Also point iii. with regards concerns over boundary treatments and potential influence of fencing treatments etc. No response and point omitted from draft SoCG.
19.03.26	Email	The Applicant sent the draft Statement of Common Ground (SoCG) to the Lincolnshire Wildlife Trust and stated that they would welcome any comments from Lincolnshire Wildlife Trust, and would be grateful if these could be provided by the close on 3 April 2026.
24.03.26	Email	The Applicant sent the Lincolnshire Wildlife Trust the meeting notes from the 02 March 2026 and asked for any changes needed to this note to be provided. The Applicant confirmed further meetings are planned with the local authorities and Natural England with any relevant information forwarded to the Lincolnshire Wildlife Trust and that any additional information regarding invertebrate surveys will be provided.
26.03.26	Email	The Lincolnshire Wildlife Trust stated that a meeting was booked with their Head of Conservation, who is our signatory on all SoCG on the 8th April to review and that a response with comments and edits will be provided following that discussion.
26.03.26	Email	The Applicant –an updated draft SOCG provided
14.04.26	Email	LWT – confirmation that we would not sign SoCG in current format, and reiterated request for multiple points of basic information proffered on 02.03.26. LWT stated – '*Regarding next steps, The Trust will provide a proposed rework of the SoCG within the week 4th May.*'
29.04.26	Email	The Applicant – Emailed revised invertebrate report. The Applicant sent the Lincolnshire Wildlife Trust an update on the project, confirming that comments

		received in Relevant Representations and from meetings have been addressed in updated reports to be submitted at Deadline 1. The Applicant also issued the invertebrate survey report that was submitted with the original application and confirmation on this survey scope. The Applicant suggested a further meeting with the Lincolnshire Wildlife Trust once updated reports have been reviewed.
06.05.26	E**mail**	LWT confirmed receipt of the Applicant's email of the 29.04.26.
14.05.26	Email	LWT – Confirmed validation meeting requested with Natural England, advice provided on some points, however staff shortages with NE impacting response timelines.
01.06.26	Email	The Applicant – request for update on SoCG and timescales for when it would be issued.
03.06.26	Email	LWT – Confirmed draft SoCG remains under discussion, that they are still awaiting some comments and advice from Natural England, and that- a discussion with the Head of Conservation will be had on the proceeding Monday to see if comments can be released as a draft at this stage.
04.06.26	Email	The Appli**c**ant thanked the LWT for the update and stated that they would hopefully be able to provide further information during the following week.
11.06.26	Email	The Applicant – request for update on SoCG and also requested another meeting to discuss ecology matters further. Note comments on creating plan showing zoomed in section of Order Limits including the Thorne and Hatfield Moors SPA boundary – to be issued next week.
15.06.26	Email	LWT – draft technical comments and tables for SoCG provided along with detail that their Head of Conservation is still in discussions with Natural

		England, so the LWT do not currently have approval to put this into a formal SoCG. Reiterated request for boundary design from The Applicant noting this key information and impacts multiple points of discussion. Confirmed that a meeting would be useful.
15.06.26	Email	The Applicant – Meeting invitation for 17th requested.
16.06.26	Email	The Applicant issued a meeting invite for the 17th June
17.06.26	Email	The Applicant – Buffer and proximity map presented for Thorne and Hatfield Moors.
17.06.26	Email	LWT – Updated buffer maps requested as shapefiles rather than imagery with reference to meeting points over encroachment on SSSI hydrological protection zone.
17.06.26	Email	The Applicant confirmed that they do not have the shapefiles, that they used the submitted landscape and visual mitigation strategy plans that were georeferenced. The Applicant informed that these plans are being updated for Deadline 3 and asked if the LWT would like the Applicant to ask if the shapefiles can be shared with them.
17.06.26	Online Meeting	The Applicant and the LWT discussed the LWT SoCG and the outstanding issues. The Applicant provided an update on the BNG calculations and the LWT confirmed that the changes would address their points raised. Further discussions on nightjar habitat, mitigation area locations and drainage in proximity to the SSSI were discussed. LWT position that Nightjars are sensitive to disturbance and that they have been unable to identify any study or literature evidencing Nightjar feeding within a solar array. Tracking data evidences overlap and usage of surrounding arable areas at Thorne and Hatfield, so can be presumed for Crowle,

		and concerns that flight paths between standing woodlands may be fragmented. LWT requested any additional evidence or literature to support The Applicants position. With regards to the SOCG, the LWT confirmed that the technical comments had been compiled but remained subject to sign-off by the Trust's Head of Conservation. The Applicant confirmed they would respond once the SoCG was issued.
13.07.26	Email	The Applicant requested an update on SoCG. **The** Applicant also asked the LWT if anything further was needed form them to assist the LWT with this.
14.07.26	**Email**	LWT – Confirmed draft SoCG remains under discussion. Stated that they require information discussed at the previous meeting with regards to The SSSI Hydrological Protection Zone and nightjar.
16.07.26	Email	The Applicant emailed the LWT with the latest version of the 6.3.10.1 Environmental Statement Appendix 10.1: Flood Risk Assessment, which confirms that existing flow patterns and surface water drainage won't be affected as a consequence of the scheme. In addition, additional plans were issued that were to be included in the updated Report to support Habitat Regulations Assessment and show the large areas across the site that will comprise neutral grassland that will provide suitable foraging habitat for nightjar.
20.07.26	Email	The Applicant checked with LWT whether the information previously sent had been received and also requested an update on when their SOCG will be issued.
21.07.26	Email	LWT confirmed that they had not received the email from the 16.07.26. LWT stated that if they received

		the information in the email today they will ask for a review meeting with their Head of Conservation this week.
22.07.26	Email	The Applicant confirmed that the file sizes may have been too large for the 16.07.26 email to be received by the LWT. Therefore, the Applicant attached a reduced file sized version of the grassland buffer plan and informed that they will send 3.10.1 Environmental Statement Appendix10.1: Flood Risk Assessment Part 1 (Clean) as a file transfer.
22.07.26	File Transfer	Confirmation received by the Applicant that the files sent had been received by the LWT.
22.07.26	File Transfer	Confirmation received by the Applicant that the files sent had been downloaded by the LWT.
29.07.26	Email	LWT issued their latest version of the draft SoCG with key issues separated into sub-sections and a headline summary table of positions included, as per NSIP SoCG guidance.
29.07.26	Email	The Applicant confirmed receipt of the SoCG and stated they would review and get back to the LWT with any comments.
03.08.26	Email	The Applicant noted that the LWT SOCG was presented in a different format and style compared to the original versions and requested whether the updated SoCG could be returned to the original format. The Applicant also offered a meeting to discuss this.
04.08.26	Email	LWT explained its reasons for using the revised format and advised that it may provide an independent written update if agreement could not be reached.
05.08.26	Email	The Applicant clarified that the request to update the SOCG related only to the presentation and layout of the SoCG and confirmed that the

		approach would be discussed further with the project team.
06.08.26	Email	The Applicant confirmed that an updated SoCG would be provided for LWT's review on 26 August.
10.08.26	Email	LWT confirmed that it had not submitted the SoCG and would review an updated version on 26 August, otherwise it would proceed with an independent submission.
10.08.26	Email	The Applicant confirmed that an updated SoCG would be provided for LWT's review on 26 August.
13.08.26	Email	The Applicant confirmed that an updated SoCG in the original format would be issued for LWT's review ahead of Deadline 6.
27.08.26	Email	The Applicant advised that the updated SoCG was delayed and would be issued later that day.
27.08.26	Email	The Applicant issued the updated SoCG incorporating LWT's information within the original format and requested comments.
03.09.26	Email	LWT requested clarification regarding changes to its technical comments on non-breeding birds, nightjar and BNG within the SOCG~~:~~
03.09.26	Email	The Applicant confirmed that no technical comments were intentionally removed and agreed to review and reissue the SoCG for LWT's consideration.

~~4 Headline Positions~~

Table 3-1 . Current Position

Ref	Topic	Lincolnshire Wildlife Trust Position	Applicant Position	Status
	Adequacy of consultation	Adequacy of Consultation ~~II.~~ The Trust identified itself as an interested party in a consultation response dated 11th December 2023, raising a number of points of query, as both a neighbouring land owner with a nature reserve and SSSI bounded to the proposed development, and as a nature conservation organisation. ~~III.~~ The Trust submitted follow-up requests for direct discussion through the info@tweenbridgesolar.co.uk email address in both April 2025 and July 2025, receiving holding responses, but no further engagement from the applicant ~~IV.~~ Further, we have not located any record of our consultation submission or subsequent email requests within the presented DCO documentation.	The Applicant undertook detailed consultation with Natural England, the government's statutory advisor on nature conservation, regarding survey scope and methodologies, potential impacts to designated sites, including SACs, SPAs Ramsar and SSSIs, required mitigation and enhancement for designated sites and protected species, and the overall design of the Scheme. In addition, detailed consultation was undertaken by the Applicant with the two relevant local authorities regarding the same topics, the City of Doncaster Council and North Lincolnshire Council. These consultations informed the ecology approach undertaken in support of the DCO application. The Applicant also submitted a PEIR chapter as part of consultation on the application, which detailed the ecology information available at the time to	**Not Agreed**

		V. The Trusts wishes to express and echo comments on record from other stakeholders that the applicants consultation has been minimal, inadequate and a significant departure from comparable developers engagement endeavours. The oversight to engage with a directly impacted party, particularly when the abounding property is a nature reserve and SSSI designate, which is referenced by the applicant in numerous ecological reports and assessed for risks, should be considered a failure in due process The applicant failed to respond to repeated requests for engagement and early dialogue with The Trust over a period of 28 months prior to DCO submission. Since engagement, the timeliness of receipt of key basic information has impaired the Trusts ability to make informed responses to comments, engage in ISH's, or seek 3rd party expert advice, and as a consequence has delayed advancement on a number of issues. Of specific importance, we refer to the boundary and buffer design for our abounding properties at Crowle Moor SSSI, where detailed	support the consultation process under Section 42 and Section 47 of the Planning Act 2008 prior to the final Environmental Statement (ES) being produced. All consultation responses were considered as part of the ES. The Applicant has subsequently undertaken an online meeting with the Lincolnshire Wildlife Trust to ensure that all their comments are fully considered and addressed through the DCO process The Applicant has been in regular email correspondence and undertaken a further meeting with the LWT to ensure that all their comments are fully considered and addressed through the DCO process, as detailed in Table 2-1 above. The Applicant confirms that during the Examination process, information has been issued to the LWT when it is completed and available, and in line with the Examination timetable. Furthermore, the provision of additional information has been affected by the time the Applicant has had to wait for the updated Statement of Common Ground	

		designs were provided 31 months after our initial request (on the 17.06.26).	received from the LWT, which was originally identified by the LWT as being issued the week commencing 04.05.26, but was issued in draft on the 27.07.26, with technical detail also provided on the 15.06.26. The Applicant had requested numerous updates on the SOCG progress as detailed in Table 2-1 above.	
	Bird Impacts (Non-Breeding General)	In review of the breeding birds and non-breeding birds survey reports, we note the relative importance of Area B (Crowle) of the development, supporting a number of species which are present in significant numbers. For example, concentrations of species such as lapwing and golden plover. As noted by the applicant a number of species exceed the 1% threshold for Webs 5-year mean counts from the Humber Estuary SPA indicating usage as Functionally Linked Land. However, The Trust also notes with concern and reservation the distribution of the proposed bird mitigation parcels, and lack of proximity to Area B (Crowle). With reference to the bird survey results and species distribution it is apparent that a number of other species are aggregating in or near to the Crowle Warpings.	~~VI.~~ The Applicant acknowledges that there are a number of species that exceed the 1% threshold for Webs 5-year mean counts from the Humber Estuary SPA indicating usage as Functionally Linked Land, and consulted with Natural England regarding potential impacts and required mitigation. Given the mobility of SPA bird species, and the location of the Order Limits approximately 7.7 km from the Humber Estuary SPA, it is clear that SPA bird species travel large distances and will utilise suitable habitat where it is available and are not restricted to using habitat in only one location. This is supported by the breeding and non-breeding bird survey data recorded by the Applicant, which demonstrates that	**Under Discussion**

		As recognised, Warpings form a transitional habitat on the periphery of peatlands, and commonly create damp arable or wet grasslands supporting high densities of soil invertebrates. The proposed mitigation sites do not appear to account for this higher carrying capacity habitat. The Trust has also undertaken a mapping review comparing the Year 1 and Year 2 survey results with the proposed mitigation parcels. This indicates that Area B supported comparable or higher peak counts of lapwing and pink-footed goose than a number of the selected mitigation parcels. The Trust therefore maintains its request for a clear explanation of the mitigation parcel selection criteria and the basis for not locating additional mitigation closer to Area B. Updated Technical comments provided by LWT to The Applicant; Following a mapping review exercise, we have overlaid the bird count results for Lapwing and Pink Footed Geese presented in Document Reference 6.3.7.3 - Non-Breeding Bird Surveys Report (Year 1 and Year 2) against the Outline Non-Breeding Bird Mitigation Strategy	bird species move around the Order Limits and wider area and do not only remain in one part of the Order Limits, or rely on any specific area. With regards to lapwing the first years of surveys in 2022-23 recorded high numbers in Area B. However, in the second years of surveys in 2023-24 significantly lower numbers were recorded in Area B (17 in total), with higher numbers recorded elsewhere within the Order Limits, demonstrating that lapwing do not rely on any one area in the Order Limits. The Applicant has designed the mitigation areas to reflect bird use where possible, whilst acknowledging that bird species move to areas of suitable habitat. As such, the mitigation design completed following consultation with Natural England has been designed to ensure the habitat requirement of bird species present, including those functionally linked to the SPA, are provided. Given the mobility of SPA bird species, and the location of the Order Limits being approximately 7.7 km from the	

		(Document Reference 6.3.7.10) - where we have accounted for direct observations within field compartments, and also pooled counts from directly adjacent fields, or those considered directly proximal, as presented by the applicants maps within the survey boundary. In the main, we agree with the siting of several of the mitigation areas where they offer wider strategic benefits (M1), or deliver larger coherent blocks inline with the Lawton principles (M12, M11 & M13). However the rationale for some site selections appears to conflict with the narrative provided in the applicants response for discounting the need for strategic mitigation surrounding Area B. Area B records consistently high PFG counts across Years 1 and 2, averaging 1257, which would position it as having the second highest count in comparison to the several of the strategic mitigation areas presented, which reference PFG benefit or count numbers. Similarly Area B appears to provide a higher peak count for Lapwing than any mitigation area. In Table (6.3.7.10), the Column for 'Current Baseline' appears to be used as a measure of	Humber Estuary SPA, it is evident that SPA bird species are capable of travelling large distances and will utilise suitable habitat wherever it is available, rather than being depending on a single location. This is supported by the breeding and non-breeding bird survey data recorded by the Applicant, which demonstrates that bird species move around the Order Limits and wider area and do not only remain in one part of the Order Limits, or rely on a specific area. This is demonstrated by the results for lapwing. The first years of surveys in 2022-23 recorded high numbers of lapwing in Area B. However, in the second years of surveys in 2023-24 significantly lower numbers were recorded in Area B (17 in total), with higher numbers recorded elsewhere within the Order Limits, demonstrating that lapwing do not rely on any one area in the Order Limits. Full results are detailed in 6.3.7.3 Environmental Statement Appendix 7.3 Non-Breeding Bird Survey Report (Year 1 and Year 2) [AS-015].	

		site suitability or justification, and we note the commentary as; - Mitigation Parcel M1 – 'Rough grassland set on the edge of the adjacent SPA, noted to be used by Lapwing (peak counts of 45 and 8 bird)... Lapwing also recorded in adjacent field in larger numbers (112 and 32 birds)' - Mitigation Parcel M4 – 'Direct adjacent to plots used by lapwing' - Mitigation Parcel M5 – 'Peak count of 360 PFG, recorded within plot , and directly adjacent to other fields where PFG geese and lapwing were recorded' - Mitigation Parcel M7 – ' Forms one continuous parcel with parcel 8, albeit separated by a hedge and ditch. Had PFG recorded present' - Mitigation Parcels M11, M12, M13 – 'PFG record using fields in close proximity that comprise similar habitats' In review of our mapping cross reference exercise; Parcel M4 appears to have no direct counts of Lapwing within the field. Parcel M5 appears to have a Y1 peak count of 360 and Y2 count of 0 for PFG. Parcel M7 appears to have no direct counts of PFG within the field. Parcels M11, M12 and M13 – all appear to have 0 bird counts for Lapwing and PFG in Year 2, with peak counts of 465 Lapwing in M11 and 277 Lapwing in M12.	The Applicant has designed the mitigation areas to reflect bird use where possible, whilst acknowledging that bird species move to areas of suitable habitat. As such, the mitigation design completed following consultation with Natural England has been designed to ensure the habitat requirement of bird species present, including those functionally linked to the SPA, are provided. The Applicant confirms that all mitigation measures, including the location of the mitigation areas, have been agreed with Natural England, as demonstrated by their Statement of Common Ground [**REP5-055**], which states that this topic is Agreed.	

		In the context of Area B (and adjacent fields through a consistently applied approach), For Lapwing, Area B presents a peak count of 898 in Y1 and 23 in Y2. Which appears to align and exceed the rationale presented for M1 and M4. For Pink Footed Geese, Area B presents a Y1 count of 803 and Y2 count of 1711, averaging 1257 across the survey period. This appears to align and exceed the justification provided in the identification of M5, M7, and M11, M12 & M13 as a combined block. Given this disparity, can the applicant provide a detailed explanation and breakdown of the mitigation site selection criteria and decision making process? From The Trusts perspective, the evidence indicates sub-optimal mitigation site positioning on the basis of Year 1 and Year 2 feature distribution.		
		~~VII.~~ We note and welcome the identification of need for a significant skylark mitigation strategy and provisions proposed with oLEMP to replace lost nesting opportunities with compensatory land allocation.	~~VII.~~ The Applicant agrees that the **Outline Landscape Ecological Management Plan [~~Document Reference 7.6 Revision 2~~]**REP4-055] provides provisions to replace lost nesting opportunities and	Agreed

			compensatory land allocation with regards to skylarks.	
		~~VIII. However, The Trust also notes with concern and reservation the distribution of the proposed bird mitigation parcels, and lack of proximity to Area B (Crowle). With reference to the bird survey results and species distribution it is apparent that a number of other species are aggregating in or near to the Crowle warpings. As recognised, warpings form a transitional habitat on the periphery of peatlands, and commonly create damp arable or wet grasslands supporting high densities of soil invertebrates. The proposed mitigation sites do not appear to account for this higher carrying capacity habitat.~~	~~VIII. As detailed above, the bird surveys undertaken by the Applicant demonstrate that bird species move around the Order Limits and wider area and do not rely or remain in one part of the Order Limits as detailed with **ES Volume 2 ES Chapter 7 Ecology and Nature Conservation [AS-012REP5-012].** Therefore, the Applicant has designed the mitigation areas to reflect bird use where possible, whilst acknowledging that bird species move to areas of suitable habitat. The Scheme's mitigation strategy can be seen in **ES Figure 6.4 Landscape and Visual Mitigation Strategy [Document Reference 6.4.6.4 Revision 2] [REP4-042].**~~ ~~The mitigation design completed by the Applicant, following consultation with Natural England, has been designed to ensure the habitat requirement of bird species present, including those functionally linked to the SPA, are provided. In addition to this, the Applicant has ensured that grassland~~	

			~~margins and new native landscape planting are provided around Area B, and across the Order Limits, which will provide significantly enhanced opportunities for bird species, and other wildlife, compared to the existing situation, which is intensive arable farming.~~ ~~Recent research has shown that solar farms contain a greater bird abundance and species richness than arable farmland and that solar farms can benefit biodiversity in arable-dominated landscapes (Copping et al. 2025)[2].~~ ~~The drainage scheme developed by the Applicant, as detailed in **ES Volume 2 Chapter 10 Water Resource [APP-047]** of the ES, demonstrates with regards to water resources, flood risk and drainage that with the implementation of the embedded design and additional mitigation measures to be implemented for the construction, operational and~~	

~~[2] Copping, J. P., Waite, C. E., Balmford, A., Bradbury, R. B., Field, R. H., Morris, I., & Finch, T. (2025). Solar farm management influences breeding bird responses in an arable-dominated landscape. *Bird Study*, 72(3), 217–222. https://doi.org/10.1080/00063657.2025.2450392~~

			~~decommissioning phases, all identified potential effects have been assessed as being of Negligible significance, and therefore Not Significant. Therefore, the ground conditions will still provide the wet grassland with the Order Limits and surrounding damp arable beyond the Order Limits, for the benefit of soil invertebrates.~~ ~~Furthermore, the cessation of intensive arable farming practices within the Order Limits, which will significantly reduce the nutrient input into the water system, will likely assist with invertebrate density and assist with improving the carrying capacity of the habitats.~~ ~~Within the Relevant Representation provided by CDC, they state that '*It is considered that the cessation of agricultural inputs and physical disturbance from ploughing and harrowing will have a beneficial impact on water quality and this is accepted*.' The Applicant considers that this provides further supporting detail on this point.~~	

			~~The Applicant has also ensured that wetland features are incorporated into the mitigation design to benefit invertebrates and therefore foraging bird species, with Mitigation Areas M10, M11 and M12 providing wetland scrapes.~~ ~~In addition, all ditches in the Order Limits are proposed to be enhanced through improved management, will have improved water quality due to cessation of farming practices, and will be buffered by neutral grassland verges to provide a further enhancement for wildlife.~~	
		~~IX. The Trust would recommend either the relocation, or introduction of an additional mitigation site in close proximity to development Area B, in a suitable location on warpings habitat, at a scale accounting for the significant peak bird counts in this locality, in particular lapwing.~~	~~IX. The Applicant considers that the mitigation proposals, which includes not only the identified mitigation areas, but all the landscape planting, drainage ditch buffers and grassland margin provision, across the Order Limits, provides sufficient mitigation for the species recorded within the Order Limits. As set out above this is supported by Natural England Statement of Common Ground [Document Reference 9.9 Revision 4] confirms that the overall extent, distribution and suitability of the non -~~	

			~~breeding bird mitigation package are sufficient.~~	
		~~X.~~ The Trust is aware that opportunities are available for appropriate mitigation in proximal locations, if not abounding the proposed development, with third-party land owners in pre-registration as off-site biodiversity net gain providers.	~~X.~~ The Applicant welcomes the Wildlife Trust providing this information, although all BNG gains will be provided within the Order Limits.	Agreed
		Biodiversity Net Gain ~~XI~~. With reference to Appendix 7.12, 3.10 The Trust does not support the current assumptions of vegetation condition beneath solar panels. We refer to the latest of points of discussion and the pending Clarkson-Woods publication which supports classification as Modified grassland in Poor condition. We understand discussions for a formal clarification statement are underway with UKHab and Natural England which will recommend a specialist secondary code to this effect. There is a substantive and consistent evidence base forming over the medium to long-term impacts of solar panel shading on habitats and soils, which do not support the assumptions of the applicant or align with their interpretation of the precautionary approach.	~~XI.~~ The Applicant notes the comments raised by Lincolnshire Wildlife Trust regarding the classification of vegetation beneath solar panels. Within the Biodiversity Metric, the vegetation beneath the panels has been classified as modified grassland in poor condition. This approach was adopted on a precautionary basis to reflect the potential influence of shading, maintenance access and panel infrastructure on vegetation composition and structure. The Applicant acknowledges the forthcoming Clarkson-Woods publication and the potential development of a specialist UKHab secondary code for vegetation beneath	Agreed

		There are a now a number of contemporary synergistic studies which have assessed the influence of multiple solar farms and the influence of shading in the medium to long-term, with the following referenced studies accounting for combined results from 69 solar farms. These represent three of the most substantiative studies into solar farms across Europe and contemporary literature (2026, 2025, 2025). Common conclusions are drawn determining reductions in plant richness, biomass, impaired and reduced C & N, loss of soil function, and loss of mesofauna. Whilst there are studies and literature which have identified short-term uplifts, particularly from arable reversion, the evidence base now strongly indicates significant long-term habitat modification and functional impairment. We refer to the established regional precedents where multiple solar farm applicants within Lincolnshire have accepted the requirement to adopt a more precautionary approach due to these uncertainties, and have accepted a revision to classify panel shaded areas as modified grassland. The Trust maintains its position that Other Neutral Grassland is likely unachievable as a post-construction habitat in areas shaded by	solar panels. As this clarification is not yet formally adopted within the UKHab classification or the Statutory Biodiversity Metric guidance, the current assessment has applied the most appropriate existing habitat classification within the metric framework. The approach taken is considered precautionary, as areas of grassland beneath solar panels will be established using a species-rich neutral grassland seed mix and managed through grazing or mowing. While some areas may achieve a higher condition over time, the Biodiversity Metric assessment conservatively assumes poor condition to avoid overestimating biodiversity gains. The Applicant will continue to monitor developments in national guidance relating to the classification of vegetation beneath solar panels. Should formal guidance or updated UKHab classifications be published prior to determination of the Scheme, the Applicant will review the assessment	

		solar panels, whichout significant functional impairment. Lec'hvien. A, Bienvenu. L, Isselin- Nondedeu. F, Bischoff. A, Schatz. B and Gros. R (2026) Effects of solar panels and management on soil mesofauna, respiration and plant traits in solar parks of two southern French regions. Journal of Environmental Management. Vol 402. 129190. •Plant species richness was significantly lower Under panels than Between (-12%) and Outside (-37.5%) •Found that (i) solar panels had direct, mostly negative effects on vegetation characteristics (species richness, functional traits) and mesofauna abundance. •"As a consequence, solar panels and management are expected to have a negative effect on soil mesofauna and soil respiration through changes in plant species richness, plant functional traits and soil physico-chemical properties" Valho.F, Montag. H, Bentley. L, Šarlej. R, Broyd. R, Blaydes. H, Cattin. M, Burke. M, Wallwork. A, Ramanayaka. S, White. P, Sharp. S, Clarkson. T, and Armstrong. A. (2025) Plant and soil	and update the Biodiversity Metric where appropriate. The Applicant confirms that the BNG assessment was updated at Deadline 3 to address all comments received from the LWT, as well as CDC - The Statutory Biodiversity Metric Calculation Tool [**REP3-085**]. The Applicant notes that LWT now has no objection to the BNG percentages and has set this point to Agreed.	

		responses to ground-mounted solar panels in temperate agricultural systems. Environmental Research Letters, Volume 20, Number 2. •Samples of 32 solar farms in England and Wales in summer 2021. •Plant cover and aboveground biomass were significantly lower under solar panels than in the gaps between solar arrays and in pastures. •Soil compaction was 14.4% and 15.5% higher underneath solar panels than in gaps and pastures, respectively •Soil organic carbon was 9% lower under solar panels than in gaps, while particulate organic matter was 29.1% and 23.6% lower under solar panels than in gaps and pastures. Scholten. L, de Goede. R, Edlinger. A, Van Aken. B, De Deyn. G (2025) Sharing the light, impact of solar parks on plant productivity, soil microbes and soil organic matter. PLANTS, PEOPLE, PLANET Volume 8, Issue 3 pp. 1000-1013. •Sample of 17 solar parks across the Netherlands.		

		•Across all parks, the mean monthly soil temperature was significantly higher in the gap between the solar panels than below the panels from May through July. •Plant above- and below ground biomass was significantly reduced under the panels and was on average 80% lower below than between the panels for both harvests and across all parks. •Additionally, the C:N ratio of plants was significantly lower below panels than between panels, with an average C:N ratio of 13 below compared to 28 in between the panels. •The average aboveground biomass produced during the growing period April–October ranged from 1.9 to 8 Mg ha-1 between the panels and from 0.03 to 3.43 Mg ha-1 below the panels. In two solar parks (ROO and WBG), vegetation below panels was almost absent. Vegetation management did not have a significant effect on vegetation biomass. Noting the designation of Thorne and Crowle Moors as lowland peat bogs, the soils are highly acidic, and as per our previous comments, these peatlands extend into the Warpings as a transitional habitat.		

		- Separate comment - We refer to the Natural England peat map (2025), and associated data layers, which evidence both significant extents of peat across the applicants development area and at shallow depths. How has the applicant accounted for theses areas of shallow acidic peat substrates, and what accommodations have been made to deliver/ensure that ONG criterion is achievable? With reference to the LEMP we note that the proposed Emorsgate EM1 is a generalist mix and does not appear compatible with acidic soils, or include appropriate species to achieve ONG on peatlands. LWT – we note the applicants change position to the classification of post-creation habitats under solar panel arrays, with acceptance of the revised classification to Modified Grassland Poor Condition, which overcomes our objection.		
		Crowle Moor ~~XII~~. In reference to Chp7 – Section 7.5, we acknowledge the narrative provided on the importance of the Thorne, Crowle and Goole Moors SSSI, and its role in supporting an	~~XI.~~ Agreed.	Agreed.

		assemblage of breeding bird, non-breeding bird, invertebrates and faunal communities.		
		~~XIII. As per our points on adequacy of engagement, we question the assumptions made over impacts to the SSSI and LWT nature reserve, given the lack of consultation or engagement in dialogue over management of the site with The Trust.~~	~~XIII. Consultation to discuss the SSSI was undertaken with Natural England and discussions will be continued between the Applicant and Lincolnshire Wildlife Trust regarding the SSSI and Lincolnshire Wildlife Trust nature reserve.~~	~~Under Discussion~~
		~~XIV.~~ We do not concur with broad statements made in 7.5.73 that 'species associated with the SSSI are largely dependent on moorland habitat'. The LWT now accepts this point with the exclusion of Nightjars.	~~XIV.~~ The SSSI supports a range of species that are dependent on moorland habitat, although the Applicant acknowledges that some species associated with the SSSI also utilise other habitat types. The Applicant consider that with the native habitat creation proposed across the Order Limits, including large areas of neutral grassland in the place of intensively managed arable farmland, new native hedgerows and trees and improved water quality and soil conditions as a consequence of a cessation in intensive farming practices, will ensure that SSSI species will not be detrimentally impacted. The recent	Agreed

			research by Copping et al . (2025), provides further clarity regarding this. The Applicant notes that all detail regarding SSSIs have been agreed with Natural England, as confirmed in their SOCG [Document Reference 9.9 Revision 4] points NE21 and NE22.	
		~~XV.~~ We consider that the surrounding arable fields function as a supporting mosaic to several of the species utilising the SSSI, affording important ecological functions as; foraging grounds, commuting habitats and supporting prey populations. LWT – From the Trusts perspective, insufficient information has been presented to support the determinations and conclusions drawn in; 7.5.76 – 'Impacts on Thorne, Crowle and Goole Moors SSSI are considered to be negligible on a receptor of National value and sensitivity, but Not Significant during construction'. And 7.5.136. 'Impacts to …Thorne, Crowle & Goole Moors SSSI… will be of medium (positive) magnitude on a receptor of International/European – Local value and sensitivity, which are consequently a Significant beneficial effect'.	~~XV.~~ The Applicant considers that the mitigation and enhancement measures proposed, including the native habitat creation across the Order Limits, comprising large areas of neutral grassland in the place of intensively managed arable farmland, new native hedgerows and trees and improved water quality and soil conditions as a consequence of a cessation in intensive farming practices, as also confirmed by CDC in their Relevant Representation, will ensure that SSSI species will not be detrimentally impacted. Furthermore, the mitigation design still includes the provision of arable within the Order Limits and extensive areas of arable farmland beyond the Order Limits will remain post-construction	Under Discussion

		A request for more granular detail of boundary treatments and buffer zone extents adjacent to our property / Crowle Moor SSSI [Email point iv.] Our concerns over the importance of the Warpings, both from a hydrological perspective as it offers a supporting and water table function linked to the Crowle moors raised bog features, and as wet grassland supporting invertebrates and bird features. We requested further details on the drainage plans and any alterations likely to affect water movement within the Warpings extent LWT – The proposed solar array extends into the Thorne and Crowle Moors SSSI's identified Hydrological Protection Zone, impacting a proposed LAGG creation site which has been identified to support site condition recovery. In support of this position, the Trust refers to the JBA Consulting (2010) Water Level Management Plan, which identified Crowle Moor as being in a 'Too Dry' condition and identified potential Lagg creation within the overlapping Warpings area as a strategic intervention to support hydrological recovery.	~~XIX.~~ The Applicant considers that the cessation of intensive arable farming that will improve water quality will assist with enhancing the SSSI and preventing impacts to damp and wet habitats, with agriculture detailed as being an Adverse condition reason on Natural England's Condition of Features for this SSSI[3]. The measures provided within the **Outline Ecological Construction Management Plan [REP5-030]** prepared by the Applicant, provides detail that demonstrate no impacts will take place to the SSSI during construction. In addition, the Applicant believes that the reasons detailed above, including the detail on native habitat creation across the Order Limits,, buffer provision and connectivity measures, will ensure that habitat provision is provided and enhanced compared to the existing situation for SSSI species.	

[3] Site feature condition

		We await the requested additional information on the final drainage design within the Warpings fields. JBA Consulting produced a Water Level Management Plan for the Moors in 2010, which identified the hydrological conditions of the Crowle Moor SSSI, abounding the Tween Bridge development as in a 'Too Dry' condition. A key component of the WLMP was to review the extent of the SSSIs Hydrological Protection Zone [HPZ] and make recommendations for boundary refinement, alongside intervention works to improve or allow for recovery of the SSSI habitats. As per the reports inset figures 1-4 & 1-6, the HPZ extends into the proposed The Applicant development site, and this does not appear to have been accounted for within the ecological constraints. With particular reference to the reports recommendations for proposed interventions and engineering works, the creation of a Lagg within the overlapping area of the Warpings has been identified as key strategic measure which would allow for rewetting and recovery of degraded areas of the SSSI (Figure A1). The installation of a solar array and grassland boundary buffers as proposed, would not support the SSSI, and	The Applicant confirms that drainage design within the Order Limits is set out in Environmental Statement Appendix 10.1: Flood Risk Assessment Part 1 [REP2-047]. In addition, the Applicant confirms that this was sent to the LWT on the 16 July 2026. However, when the Applicant checked with the LWT on the 20 July 2026 that this had been received, it was apparent that due to the large file size of the document it had not been received by the LWT via email. Therefore, on the 22 July 2026 this document was sent via an external file transfer system, and a confirmation email was received by the Applicant on the 22 July 2026 that this document, Environmental Statement Appendix 10.1: Flood Risk Assessment Part 1 [REP2-047], had been received and downloaded by the LWT. Appendix 10.1: Flood Risk Assessment Part 1 [REP2-047] confirms that existing flow patterns and surface water drainage won't be affected as a consequence of the Scheme:	

		would function as an impairment to a longterm strategic opportunity for habitat recovery. How has this report, its condition assessment for Crowle Moors, and the strategic intervention recommendations been accounted for with the Applicant design?	Paragraph 6.10 states that 'existing surface water flow patterns remain unaffected by the Scheme.' Paragraph 6.14 states that the proposed solar PV modules are considered to have a negligible impact on existing surface water drainage patterns. Paragraph 6.27 states that the proposals will result in the cessation of arable agricultural activities which will in turn, result in a variety of beneficial effects which will serve to reduce soil compaction and runoff rates from the Order Limits, as listed below: • The Order Limits will not be left without vegetation cover during the winter as experienced with arable farming; • The Order Limits will not be intensively trodden or over grazed; and • The Order Limits will not be regularly traversed by heavy machinery. The Applicant confirms that the JBA Consulting (2010a). Thorne, Crowle and	

			Goole Moors Site of Special Scientific Interest Water Level Management Plan. Final Report and the JBA Consulting. (2010b). Thorne, Crowle and Goole Moors SSSI Water Level Management Plan: Summary Report, have been reviewed and considered as part of the Scheme design. These reports produced for Natural England, and Partner Internal Drainage Boards (IDBs) have the objective '*to provide water levels to bring the site into favourable condition (or unfavourable recovering condition) by 2010*' (JBA Consulting. 2010a). The 2010 reports state that historical drainage of the moors and surrounding areas has resulted in lowered water levels and degradation of the peat-forming habitats. Therefore, agricultural practices requiring ongoing drainage could continue to negatively affect the adjacent SSSI. The Applicant confirms that there this a small overlap with the SSSIs Hydrological Protection Zone [HPZ], identified by Natural England in these 2010 reports, and the north east of the Order Limits. Although no lagg creation is proposed within this area of	

			overlap, the proposed cessation of agricultural practices and reversion to grassland would reduce the potential for drainage-related impacts and improve water quality, as detailed above. The proposed land use change therefore has the potential to support, the conservation and restoration objectives of the SSSI and the objective of the Water Level Management Plan. The Applicant notes that Natural England, as the statutory nature conservation body and signatory of the 2010 SSSI Water Level Management Plan, has confirmed that its concerns regarding potential impacts on Thorne, Crowle & Goole Moors SSSI are resolved. Point NE21 of the Natural England Statement of Common Ground [**Document Reference 9.9 Revision 4**] records agreement following the provision of further information regarding the buffers adjoining the SSSI, the potential loss of foraging resources for SSSI assemblage species and the location of honeybee hives.	

			The Applicant therefore considers that sufficient information has been provided to support the conclusions of the assessment.	
		~~XVI.~~ Insufficient detail has been provided within the invertebrate scoping report to determine if the level of survey effort was appropriate to assess the relative importance of these areas. LWT – The applicant has provided some updated information on the invertebrate survey report. The Trust has separately undertaken an independent mapping exercise which resolves our queries on survey effort, methods and location. Given lack of receipt of transect locations, LWT has undertaken a mapping of data points presented in the report and cross referenced with LERC search records. Revert to position of agreement that invertebrate surveys is likely sufficient and representative given predominant arable baseline.	~~XVI.~~ The Applicant considers the invertebrate survey effort is sufficient in determining the assessment for the Order Limits, especially when considering the proposals will revert large areas of intensively managed arable farmland into neutral grassland that will have a significant reduction in agrichemical input and create improved habitat for invertebrates. The cessation of intensive farming practices will also result in improved water quality across the ditch network and improved opportunities for invertebrate species. . The recent research by Copping et al . (2025), provides further clarity regarding this. The Applicants view is supported within the City of Doncaster Council Relevant Representation, they state with regards to invertebrates that '*An assessment of likely significant effects is provided at*	Agreed

			Section 7.5 of the ES, and this provides sufficient information.' The Applicants view is further supported within Natural England's Relevant Representation, where they state that: *'We note the findings of the Invertebrate Scoping Report, and acknowledge that the proposed enhancements suggested in the oLEMP will likely benefit invertebrates.'* The Applicant welcomes the confirmation from LWT that this point is now agreed.	
		~~XVII.~~ In review and overlay mapping of LERC records for Area B a number of priority and S41 species appear to be present on the bounds or within the arable fields identified for development. The LWT now accepts this point with the exception of Nightjars.	~~XVII.~~ The Applicant acknowledges that there are LERC records for Area B, including a number of priority and S41 species . The Applicant considers that the mitigation and enhancement measures proposed, including the native habitat creation across the Order Limits, comprising large areas of neutral grassland in the place of intensively managed arable farmland, new native hedgerows and trees and improved water quality and soil conditions as a	Agreed

			consequence of a cessation in intensive farming practices, will ensure that opportunities for priority and S41 species will be enhanced, as confirmed within the recent research by Copping et al (2025) and the. Solar Energy UK et al. (2025). *Solar Habitat 2025: Ecological Trends on Solar Farms in the UK.*	
		~~XVIII.~~ We note the inclusion of perimeter fencing for the development, and recognise proposed inclusion of mammal gaps etc. However, the physical imposition of 2m-2.5m fencing is still likely to significantly impair some species natural foraging behaviours and diminish the value of proposed ecological boundary enhancements. The LWT now agrees with this position.	~~XVIII~~ The Applicant has positioned mammal gaps to ensure connectivity through the Order Limits and to ensure potential foraging habitat for a wide range of wildlife is provided. In addition, the Applicant has designed the fencing to enable corridors and therefore connectivity throughout the Order Limits. The Applicant also considers that the cessation of intensive arable farming that will improve water quality and native habitat creation proposed, including hedgerows, neutral grassland and trees, will ensure foraging opportunities are enhanced across the Order Limits.	Agreed

	Mitigation Parcel M2 – peat and planting	The Trust notes that Mitigation Parcel M2 appears to coincide with areas of substantive peat and queries how this has been accounted for within the proposed woodland planting. The Trust would not support tree planting in areas of significant underlying peat. Separate Query regarding Mitigation Parcel M2 – is located in an area of substantive peat deposits how has the applicant accounted for this within their design plans for 'Woodland planting on the northern boundary'? The Trust would not support tree planting in any areas with significant underlying peat.	The Applicant confirms that consideration for peat deposits has been undertaken a part of the landscape design. The proposed planting within Mitigation Parcel M2 is in the north of this parcel, which avoids the majority of peat deposits as shown on the England Peat Map (EPM) Portal	Agreed
	Bird Impacts (Nightjar commuting and foraging)	The Nightjar tracking data presented evidences foraging at Thorne and Hatfield moors extend beyond isolated tree belts and moorland, into surrounding arable areas as commuting and feeding corridors. No surveys have been undertaken to inform this aspect of interaction with the Tween Bridge Solar Farm proposal. The proximity of the solar array to Crowle Moors means there is a likely and justifiable risk of interaction and habitat fragmentation to areas	The Applicant notes that this is a new point, not included within **9.6 Statement of Common Ground with Lincolnshire Wildlife Trust [REP1-054].** The Applicant confirms that as noted by Natural England within 9.9 **Statement of Common Ground with Natural England Revision 3 [REP2-095] point NE8a** that nightjar can travel long distances to forage and therefore utilise land beyond the Order Limits boundary. As such,	Under Discussion

		currently utilised by the local Nightjar population. Following a literature review and search, no information or references have been identified which indicate or support the assumption that solar farms have a positive effect on Nightjar commuting, foraging, or any evidence of active feeding within solar arrays. This remains an unqualified risk, and professional judgement alone is unsuitable as the sole justification to discount this impact. The Trust remains awaiting any further information the applicant can provide to evidence and support its position. The Trust also refers to Mitchell (2019), which provides further analysis of the 2016–2018 nightjar tracking data and, in the Trust's view, demonstrates home-range overlap with the proposed development. The Trust considers that targeted surveys of the Crowle population, or alternatively a precautionary buffer informed by the Thorne and Hatfield tracking results, should be considered. The Trust also requests confirmation of how potential effects of artificial lighting on nightjar foraging have been addressed within the lighting strategy and boundary design.	nightjar will not rely solely upon land within the Order Limits for foraging. The Applicant confirms that the **Outline Landscape Ecological Management Plan [REP4-042]** was updated to clearly set out and secure the specific management measures intended to deliver strengthened green corridors for nightjar across the Order Limits. The Applicant also provided further detail within the updated **Report to Inform Habitat Regulations Assessment [[REP5-006]]** , on the provision of margins for foraging nightjar in areas within proximity to the SPA and key foraging areas identified in the results of the GPS tagging data. Large buffers comprising grassland margins will be delivered across the Order Limits as detailed in the, **ES Figure 6.4.6.4 Landscape and Visual Mitigation Strategy [REP4-042].** This includes the entirety of mitigation area M1 in the north of the Order Limits adjacent to Hatfield Moor SPA, the retention and protection of all non-statutory designated drains through minimum 5m buffers, which will be	

		The Nightjar tracking data presented evidences foraging at Thorne and Hatfield moors extend beyond isolated tree belts and moorland, into surrounding arable areas as commuting and feeding corridors. No surveys have been undertaken to inform this aspect of interaction with the Tween Bridge Solar Farm proposal. The proximity of the solar array to Crowle Moors means there is a likely and justifiable risk of interaction and habitat fragmentation to areas currently utilised by the local Nightjar population. Following a literature review and search, no information or references have been identified which indicate or support the assumption that solar farms have a positive effect on Nightjar commuting, foraging, or any evidence of active feeding within solar arrays. This remains an unqualified risk, and professional judgement alone is unsuitable as the sole justification to discount this impact. The Trust remains awaiting any further information the applicant can provide to evidence and support its position.	extended to 9m for all Internal Drainage Board (IDB) watercourses, and a 15m buffer to Whittaker's Plantation CLWS, a minimum 3m buffer to all hedgerows, and an approximate 10m to the bank top of River Torne. Additional larger buffers will also be provided between panels and security fencing, comprising grassland margins, with further grassland margin buffers provided outside security fencing throughout the Order Limits. Further detail has been provided within the **Outline Landscape Ecological Management Plan [REP4-055]** and the **Report to Inform Habitat Regulations Assessment** [REP5-006]. The Applicant confirms that, considering the majority of the Order Limits currently comprises intensively managed arable farmland, the provision of additional grassland habitat throughout the Order Limits will increase foraging opportunities for nightjar, when considered alongside research as detailed below. The Applicant confirms that the enhancement of hedgerows and planting of trees and scrub within margins and along field boundaries will	

		The information presented in The Applicant Document reference 6.3.7.4 / Appendix 7.4 'Nightjar SurveysResults', was subsequently utilised by one of the lead researcher to inform their phd thesis; Mitchell L.J (2019) The influence of environmental varation on individual foraging and habitat selection behaviour of the European nightjar. PhD thesis. University of York. https://etheses.whiterose.ac.uk/id/eprint/25211/ This thesis presents a more in-depth assessment of the tracking data, which The Applicant stated they would rely upon as sufficient evidence [within ISH1]. Figures 3.3 and 7.5 of the thesis analysis present the Nightjar 95% home ranges for birds tracked within the 2016 to 2018 surveys at both Thorne Moor and Hatfield Moors. The results identify significant boundary overlap with the proposed Tween Bridge development site at Thorne Moors and Hatfield Moors. With reference to The Trusts concerns over impacts to the Nightjar population at Crowle Moors, this new information and more granular assessment of home range extents reinforces our position that there is likely an unquantified interaction between the development site and nightjars, and therefore targeted surveys of the Crowle population should be undertaken, or a	be focused in areas in proximity to the SPA and areas where nightjar have been recorded foraging, with further detail provided within the updated **Outline Landscape Ecological Management Plan [REP4-055]** submitted at Deadline 2. Further information and details of the distribution of more significant field margins, as well as margins along watercourses, hedgerows and woodland edges is provided in paragraph 2.3.1 and Figures 4 and 5 within the **Outline Landscape Ecological Management Plan [REP4-055]** and paragraphs 7.2.7, 7.2.9 and 7.2.78, as well as Figures 7-2 and 7-3 within the **Report to Inform Habitat Regulations Assessment [REP5-006]** . These areas demonstrate that connectivity and corridors across the Order Limits is to be provided that will prevent fragmentation from taking place. Research has confirmed that intensively managed arable land provides relatively poor foraging conditions for nightjar, owing to lower habitat heterogeneity and reduced prey accessibility and is considered as contributing to declines	

		significant pre-cautionary buffer introduced informed by the Thorne and Hatfield results. A further point with regard the EU Life+ reporting and associated tracking results is the influence of artificial lighting and affects on nightjar feeding behaviours - how has the applicant accounted for this within their lighting strategy or associated modelling (with circular reference that LWT are still awaiting the requested granular detail about the proposed boundary treatments adjacent to SSSI / reserves requested in DCO submission / meeting 1) LWT position that Nightjars are sensitive to disturbance and we have been unable to identify any study or literature evidencing Nightjar feeding within a solar array. Tracking data evidences overlap and usage of surrounding arable areas at Thorne and Hatfield, so can be presumed for Crowle, and concerns	in insect prey abundance, potentially reducing foraging quality for aerial insectivores such as nightjars[4] . Consequently, conversion of arable land to species-rich grassland and a reduction on agricultural chemicals that will improve water quality, is likely to increase the availability of suitable foraging habitat for nightjars and contribute positively to their conservation [5] . The creation of large grassland areas and suitable margins along the mitigation parcels, hedgerows and watercourses as shown in Figures 7-2 and 7-3 within the **Report to Inform Habitat Regulations Assessment [REP5-006]** , will therefore increase foraging opportunities, especially in combination with a cessation in intensive agricultural management. In addition, The *Solar Habitat 2024*[6] survey of 87 UK solar farms found that sites with more diverse plant communities supported more	

		that flight paths between standing woodlands may be fragmented. Issue left as a request for The Applicant to provide any additional evidence or literature to support their position.	invertebrate species, and that increased invertebrate diversity was positively associated with higher bird diversity. The report concluded that solar farms can act as "havens for biodiversity" and contribute to nature restoration. Further research by the RSPB and the University of Cambridge[7] found that, hectare-for-hectare, well-managed solar farms in East Anglia supported greater bird abundance and species richness than surrounding arable farmland. Solar farms with diverse habitats, including hedgerows and species-rich grassland, supported nearly three times as many birds as nearby arable land. The Applicant considers that as scientific research has detailed that grassland habitats and areas of improved water quality provide improved habitat for nightjar and other bird species compared to intensive arable farmland, that there is scientific evidence	

			supporting the mitigation approach in addition to professional judgment.. The Applicant confirms that potential effects on nightjar, including the loss of foraging habitat, disturbance and displacement, and collision risk associated with solar panels, have been assessed. Natural England has confirmed at point NE8 of the Natural England Statement of Common Ground [Document Reference 9.9 Revision 4] that adverse effects associated with the potential loss of functionally linked land for the Thorne and Hatfield Moors SPA can be ruled out. This conclusion takes account of the retained and proposed foraging habitat, including the neutral grassland buffers and wider habitat corridors provided throughout the Scheme. The Applicant further notes that Table 3-4, point 7 of the City of Doncaster Council Statement of Common Ground [Document Reference 9.2] records CDC's position that the response concerning the management of lighting for nightjar is satisfactory.	

	Bird Impacts (Nightjar – Breeding)	LWT – Acceptance of the updated mitigation strategy to avoid disturbance to Nightjar breeding sites during construction through the inclusion of a 150m buffer zone during breeding periods.	The Applicant welcomes the confirmation from LWT that this point is now agreed.	**Agreed**

~~5~~4 Signatures

This Statement of Common Ground is agreed upon:

On behalf of Lincolnshire Wildlife Trust:

Name: Dr James Wood
Signature:
Date: 17.09.2026

On behalf of the Applicant:

Name:
Signature:
Date: