



City of
Doncaster
Council

Local Impact Report

Project: Fenwick Solar Farm

Applicant: Fenwick Solar Project Limited

Unique Reference: B100000053



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1. Introduction:

- 1.1 This Local Impact Report (“LIR”) has been produced by City of Doncaster Council (“the Council”) in response to the Fenwick Solar Farm Project (“the proposed development”). The proposed development is being progressed by an application for Development Consent by Fenwick Solar Project Limited (“the Applicant”).
- 1.2 Under Section 60 of the Planning Act 2008, Local Planning Authorities are invited to submit a LIR as part of the DCO process. Section 60(3) of the Act defines the LIR as ‘a report in writing giving details of the likely impact of the proposed development on the authority’s area (or any part of that area)’.
- 1.3 The Council understands that the primary purpose of the LIR is to identify any potential local impact of the proposed development and identify the relevant local planning policies insofar as they are relevant to the proposed development, and the extent to which the proposed development accords with the policies identified. The LIR does not assess the compliance of the proposed development with national planning policy or guidance.
- 1.4 The content of the LIR is a matter for the local authority concerned as long as it falls within this statutory definition but is a means by which the impacts and their significance are presented, with the Examining Authority (“the ExA”) undertaking a balancing exercise, in the consideration of such impacts.
- 1.5 The Council has had regard to the purpose of the LIR as set out in Section 60(3) of the Planning Act 2008 (as amended) and the Planning Inspectorate’s Advice for Local Authorities in preparing this LIR.
- 1.6 Topic based headings set out how the Council considers the proposed development accords with relevant planning policy and any potential local impact of the development. These headings are a combination of the matters raised in the Council’s Relevant Representation **[RR-001]** and topics considered in the Environmental Statement submitted with the application.

2. Scope:

- 2.1 The proposed development is a renewable energy scheme, with the Order limits amounting to approximately 509 ha of land and comprising Works defined in Schedule 1 to the Draft Development Consent Order (“the Draft DCO”) **[APP-220]** and shown on the various Works Plans **[APP-214]**
- 2.2 A full description of the proposed development is provided in ES Volume I, Chapter 2: The Scheme **[APP-054]** and a summary of the Works and the component parts of the proposed development are set out in summary form below:

- (a) Solar PV Panels made up of multiple PV cells which convert sunlight into direct current (DC) electricity. These will be at a maximum height of 3.5m;
- (b) Solar PV Mounting Structures arranged in a table format that will be a fixed south facing system;
- (c) Field Stations (including Field Station Units) incorporating transformers, centralised inverters and switchgear;
- (d) String inverters as standalone within the Solar PV Panel array if central inverters are not used;
- (e) On-site cabling required to connect the solar panels to inverters and the inverters to the transformers. Cabling between the solar panels and inverters is typically above ground level (along a row of racks fixed to the mounting structure or fixed to other parts of nearby components) and then underground;
- (f) BESS Containers and associated infrastructure to store excess electricity generated from the Solar PV Panels or excess energy in the grid. The individual BESS Containers would have built-in gas, heat and smoke detection and an explosion protection system. Firefighting water will be stored on-site in above ground tanks
- (g) On-Site Substation within Field SW8 of the Solar PV Site to alter the voltage of electricity generated so that it can be transported to the national grid and to receive excess electricity generated by the Solar PV Panels and from the grid and send to BESS for storage;
- (h) Grid Connection Cables to transfer electricity between the On-Site Substation and the Existing National Grid Thorpe Marsh Substation.
- (i) Operations and Maintenance Hub with welfare facilities;
- (j) Fencing and security measures (for example CCTV);
- (k) Access tracks;
- (l) Temporary construction compounds/laydown areas; and
- (m) Landscaping and biodiversity enhancement which includes new planting, field boundary enhancement and planting of seed mixes.

3. Description of the Area:

- 3.1 The proposed development lies wholly within the Council's administrative area.

- 3.2 The LIR relies upon the Applicant's description of the site and surrounding area as set out in ES Volume I, Chapter 2: The Scheme [APP-054]. Characteristics of note are discussed in the following assessment where appropriate.

4. Relevant Planning History and Relevant Planning Permissions:

Planning History:

- 4.1 The LIR relies on the Applicant's list of relevant planning history relating to the site and surroundings in the Planning Statement [APP-190].

Relevant Planning Permissions & Cumulative Impacts:

- 4.2 For the purposes of assessing the cumulative effects (and for the purposes of assessing the local impacts of the proposed development throughout this LIR), the Council relies on the List of Cumulative Schemes set out in ES Volume 1, Chapter 15 [APP-067].
- 4.3 In its Relevant Representation [RR-001], the Council reserved its position to make more detailed commentary on cumulative effects, explaining that whilst not committed developments at that point, two other substantial solar farm DCO projects within the Borough (and into neighbouring authorities), may have progressed in the meantime. In this respect, the following updates are provided:
- Tween Bridge Solar DCO¹ is now at the statutory consultation stage. The Council will be submitting its response to this by the 08 May 2025 deadline. It is understood that the submission is likely to be made between October and December 2025.
 - Whitestone Solar Farm DCO² is expected to be submitted between April and June 2026.
- 4.4 Additionally, planning permission for Town and Country Planning application reference 23/00537/FULM (Thorpe Marsh) has now been granted (on 28.01.2025).

5. Legislative & Policy Context

- 5.1 The legislative basis for the proposed development is set out within The Planning Act 2008, which defines the process under which consent for Nationally Significant Infrastructure Projects are determined.

National Policy Statements:

¹ [Tween Bridge Solar Farm - Project information](#)

² [Whitestone Solar Farm - Project information](#)

- 5.2 In accordance with Section 104(2) of the Planning Act 2008, the Secretary of State is required to have regard to any relevant national policy statements, amongst other matters, when deciding whether or not to grant a Development Consent Order.
- 5.3 The relevant National Policy Statements (“NPSs”) include the Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero, published January 2024), the National Policy Statement for Renewable Energy and Infrastructure (EN-3) Department for Energy Security and Net Zero, published January 2024) and the National Policy Statement for Electricity Networks Infrastructure (EN-5) Department for Energy Security and Net Zero, published January 2024).
- 5.4 This represents the primary policy basis for the determination of this application.

National Planning Policy Framework (2024)

- 5.5 In accordance with Section 104(2)(d) of the Planning Act 2008, the NPPF is capable of being “important and relevant”.
- 5.6 Paragraph 5 of the NPPF states that the Framework does not contain specific policies for nationally significant infrastructure projects and that applications for NSIP are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the NPPF).
- 5.7 The NPPF does, however, state that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure (paragraph 161).

Local Planning Policy Context:

- 5.8 Whilst not determinative under the Planning Act 2008, the ExA can consider other important and relevant matters, including local planning policy. For the purposes of section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for Doncaster comprises:

- Doncaster Local Plan (“DLP”) (adopted 2021)³
- Barnsley, Doncaster and Rotherham Joint Waste Plan (“JWP”) (adopted 2012).⁴

5.9 The Council consider the following policies of the DLP to be relevant:

- Policy 2: Level of Growth
- Policy 3: Employment Allocations
- Policy 13: Promoting Sustainable Transport in New Developments
- Policy 18: Development Affecting Public Rights of Way
- Policy 19: Access, Design and Layout of Public Rights of Way
- Policy 20: Public Rights of Way Crossing Roads, Railways, Canals and Rivers
- Policy 25: Development in the Countryside Area
- Policy 29: Ecological Networks
- Policy 30: Valuing Biodiversity and Geodiversity
- Policy 31: Local Wildlife and Geological Sites
- Policy 32: Woodlands, Trees and Hedgerows
- Policy 33: Landscape
- Policy 34: Valuing our Historic Environment
- Policy 35: Understanding and Recording the Historic Environment
- Policy 36: Listed Buildings
- Policy 37: Conservation Areas
- Policy 39: Development Affecting Archaeology
- Policy 48: Landscaping of New Developments
- Policy 54: Pollution
- Policy 58: Low Carbon and Renewable Energy

5.10 There are no Neighbourhood Plans affecting the extent of the Order area.

5.11 The Council considers the following guidance and documents to be relevant:

- Doncaster Renewable and Low Carbon Study (July 2012) which highlights the key opportunities for different forms of renewable energy in the Borough⁵
- Landscape Character and Capacity Study (2007)⁶
- Biodiversity Net Gain Supplementary Planning Document (September 2022)⁷
- Local Labour Agreements Supplementary Planning Document (adopted August 2023)⁸

³ [dmbcwebstolive01.blob.core.windows.net/media/Default/Planning/Documents/LocalPlan/Submission/Doncaster Local Plan Adopted 23 Sept 2021.pdf](https://dmbcwebstolive01.blob.core.windows.net/media/Default/Planning/Documents/LocalPlan/Submission/Doncaster%20Local%20Plan%20Adopted%2023%20Sept%202021.pdf)

⁴ [Adopted Barnsley, Doncaster and Rotherham Joint Waste Plan.pdf](#)

⁵ [AECOM A4 Portrait Generic](#)

⁶ [Doncaster Landscape Character Assessment and Capacity Study - City of Doncaster Council](#)

⁷ [Biodiversity Net Gain Supplementary Planning Document \(Adoption Version\)](#)

⁸ [Local Labour Agreement Supplementary Planning Document](#)

5.12 Other relevant Council initiatives include:

- Doncaster Green Infrastructure Strategy 2014 – 2028⁹
- Doncaster Delivering Together (“DDT”)¹⁰

5.13 Launched in September 2021, DDT is the Council's ten-year Borough strategy. DDT is about everyone being able to thrive and contribute to thriving communities and a thriving planet. This strategy does not form part of the adopted development plan, but it is important that the policies of the Doncaster Local Plan achieve the DDT's aims and objectives. The DDT has identified 8 priorities to deliver for Doncaster over the next ten years, which are:

- Tackling climate change.
- Developing the skills to thrive in life and work.
- Making Doncaster the best place to do business and create good jobs.
- Building opportunities for healthier, happier, and longer lives for all.
- Creating safer, stronger, greener, and cleaner communities where everyone belongs.
- Nurturing a child and family - friendly borough.
- Building transport and digital connections fit for the future.
- Promoting the borough and its cultural, sporting and heritage opportunities.

6. Assessment of Impacts:

6.1 This section of the LIR identifies the relevant local planning policies and how the application accords with them. It also considers the adequacy of assessment for each identified subject area and concludes whether the impacts will be **positive, negative or neutral**. The extent to which the Applicant has addressed identified impacts and assessed them adequately, complying with local planning policy, is also considered.

6.2 The Council has reviewed the DCO application and considers the local impacts arising from the following matters need to be brought to the attention of the ExA:

- Principle of renewable energy and impacts on climate change
- Cultural heritage
- Ecological impacts and biodiversity net gain
- Landscape and visual impact
- Socio-economics and land use
- Transport and access
- Noise and vibration.

⁹ [Green Infrastructure Strategy 2014 – 2028](#)

¹⁰ [Doncaster Delivering Together - Team Doncaster](#)

- Glint and glare (with specific reference to Doncaster Sheffield Airport)

6.3 In assessing the local impacts of the proposed development, the Council has drawn on the expertise of both relevant qualified officers of the Council itself (on matters pertaining to cultural heritage, ecology and biodiversity net gain, trees, employment, transport, access and public rights of way) and external professional consultants (on landscape and visual impact and glint and glare impacts) to ensure that a suitably qualified response, based on local knowledge and expertise, is provided on each of the issues. Each local impact is considered in turn below.

7. Principle of renewable energy and impacts on climate change:

Key DLP Policies:

- Policy 58: Low Carbon and Renewable Energy

7.1 At a local level, Chapter 3 of the DLP sets out the vision for Doncaster in 2035. A key part of this vision relates to the need to reduce dependency on fossil fuels to reduce locally produced greenhouse gas emissions and minimise the impacts of climate change in line with the Sheffield City Region and encourage the transition to a low carbon borough. The vision also recognises the need to encourage more efficient use of natural resources, including water, to secure and maintain a steady and adequate supply of mineral resources to facilitate development, and to protect and enhance the quality of our water and soil resources (including high grade agricultural land).

7.2 Policy 58 of the DLP sets out how proposals for renewable and low carbon energy generation will be considered by the Council. It states as follows:

The Council aims to increase the supply of low carbon and renewable energy generated in the Borough, in accordance with the principles set out below:

“A) Proposals will be supported which give priority to:

1. Community energy schemes that are in full or part community ownership
2. Biomass and energy crop schemes especially to the north and southeast of the main urban area, for example mixed woodland, single species short rotation forestry and large scale forestry, outside of areas of high quality arable farmland
3. Heat or power generation from light, water, waste and other low carbon heat sources
4. Landfill and sewage gas energy generation schemes

5. Wind power projects which meet the criteria of Policy 59; and

6. Micro-renewable energy technologies and decentralised heat and power systems within new development.

B) In all cases, low carbon and renewable energy proposals will be supported where they:

1. Have undertaken community engagement and demonstrate how they will deliver environmental, social and economic benefits

2. Have no unacceptable adverse effects on local amenity and air quality, and include appropriate stand-off distances between technologies and sensitive receptors, such as residential areas

3. Allow the continued safe and efficient operation of Doncaster Sheffield Airport

4. Would have no unacceptable adverse effects on highway safety and infrastructure

5. Have no unacceptable adverse impacts, including cumulative impacts, on the built and natural environment (including landscape character, and historic and nature conservation assets, such as Thorne and Hatfield Moors); and

6. Reclaim the site to a suitable and safe condition and use (such as agriculture or nature conservation) within a defined and agreed period should the development cease to be operational”.

7.3 In support of this policy, the DLP explains that renewable and low carbon sources of energy are central to achieving the Council’s commitments to both reducing carbon emissions and combating the effects of climate change. This is in line with the Council’s aspirations to become a low carbon borough. However, the DLP equally recognises that the potential negative effects of these sources need to be carefully assessed and managed on a case-by-case basis.

7.4 To guide developers, the Doncaster Renewable and Low Carbon Study highlights the key opportunities for different forms of renewable energy in the Borough. The Landscape Character and Capacity Study also assesses the potential of the landscape to accommodate such development (albeit the focus in this respect is on wind rather than solar).

7.5 The policy seeks to balance the need to provide a continuous supply of renewable energy and encourage sources of low-cost energy whilst protecting the interests of local communities and historical, cultural and environmental

assets. The policy sets out the main criteria that will be used to assess renewable energy proposals. Whilst the policy is not specific on which renewable energy technologies will be acceptable, it highlights key opportunities and challenges and explains how renewable energy projects can support wider policy aspirations.

- 7.6 The Doncaster Renewable and Low Carbon Energy Study (2012) indicated at that time that Doncaster made a significant contribution to renewable energy generation in the Yorkshire and Humber Region. It was ranked the second highest authority producing 12.8% of the Region's total in 2012. The Study also assessed the technical potential for renewable and low carbon energy resources within the Borough. It found that although environmental constraints such as landscape character reduce the overall opportunities for wind development, there was still significant potential to capitalise on wind resources. The Study showed that the Borough has significant biomass resource potential that could fuel district heating networks.

Key local issues:

- 7.7 The Planning Statement [**APP-246**] states that the proposed development has a 237.5MW connection at the Existing National Grid Thorpe Marsh Substation. As explained in ES Volume I Chapter 6: Climate Change [**APP-058**], renewable energy generation from the Scheme during the first full year of operation and maintenance is estimated to be 352,766 MWh. Taking into consideration a 2% reduction in solar PV panel performance during the first year and applying a 0.45% degradation factor for each subsequent year, this gives a total energy generation figure of 12,940,146 MWh over the assessed 40-year Scheme design life.
- 7.8 By its very nature, the proposed development would have **positive** impacts in terms of the production of clean renewable energy and the transition and movements towards net zero in accordance with local planning policies. Notwithstanding this, to comply with policy 58, it must be demonstrated that there are no significant adverse environmental impacts that cannot be appropriately managed and/or mitigated through the DCO process.

8. Cultural Heritage:

Key DLP Policies

- Policy 34: Valuing our Historic Environment
- Policy 35: Understanding and Recording the Historic Environment
- Policy 36: Listed Buildings
- Policy 37: Conservation Areas
- Policy 39: Development Affecting Archaeology

- 8.1 Policy 34 sets out the overarching principles by which Doncaster's heritage will be conserved.
- 8.2 Policy 35 sets out the specific requirements the Council has in place to gain an understanding of the potential impact that the proposals will have on the significance of any heritage assets or historic environment likely to be affected.
- 8.3 Policy 36 addresses listed buildings specifically, with Criterion (A) stating that proposals that enhance or better reveal the significance of a listed building or structure will be supported. Proposals that harm the significance of a listed building or its setting will not be supported other than in circumstances where that harm is clearly outweighed by the public benefits of the proposal having regard to the significance of the heritage asset affected.
- 8.4 Policy 37 sets out the principles against which development proposals affecting, or within the setting of, Conservation Areas will be assessed. Criterion (B) states that proposals should not detract from the heritage significance of a conservation area by virtue of their location, layout, nature, height, density, form, scale, materials, or design or by the removal of trees, the loss of important open spaces or other important landscape features, or through adverse impact on key views and vistas. Proposals that result in harm to a conservation area will be refused unless the harm is outweighed by public benefits arising from the development.
- 8.5 Policy 39 states that development affecting archaeological remains will be assessed against the following principles:
- A) Development that would result in harm to the significance of a scheduled monument or other nationally important archaeological assets will not be permitted other than in exceptional circumstances.
- B) Development affecting other archaeological assets will need to demonstrate how any benefits will outweigh harm to the site. When development affecting such sites is justifiable, the Council will seek to ensure preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for appropriate investigation and recording including excavation in accordance with Policy 35.

Key Local Issues

- 8.6 In assessing the impact of the proposed development on built heritage, the Council has had regard to ES Volume I, Chapter 7: Cultural Heritage **[APP-059]** and accepts the conclusions of the assessment of effects in respect of built heritage.
- 8.7 At the time of submitting its Relevant Representation **[RR-001]**, the Council was considering the potential impacts on built heritage, specifically to ensure a

suitable noise environment for those presently uninhabited buildings if residential occupation did commence in the future, with specific reference given to vacant farm buildings around/close to Fenwick Hall and Lily Hall. It is understood that the provisions set out in Requirement 14 (operational noise) of Schedule 2 of the Draft DCO [**APP-220**] seek to secure this position in respect of existing residential properties. At this time, there are no committed or even suggested plans for these buildings to be occupied as dwellings. Should this position change before the Requirement 14 (operational noise) details come forward, the Council would expect these buildings to be taken into account.

- 8.8 Turning to below-ground heritage, detailed comments were set out within the Council's Relevant Representation [**RR-001**] following advice from the South Yorkshire Archaeology Service (SYAS). The Council understands that SYAS have continued to liaise with the Applicant on detailed elements of the scheme and have also continued to provide advice to the Council to inform this LIR.
- 8.9 At the Issue Specific Hearing 1 held on 20 March 2025, the ExA asked about the roles and responsibilities of SYAS relative to the Council itself. To confirm, SYAS provide a technical archaeological service to each of the South Yorkshire authorities, Barnsley, Sheffield, Rotherham, and Doncaster via a Service Level Agreement between the four local authorities.¹¹
- 8.10 The Council's Relevant Representation [**RR-001**] detailed the programme of archaeological work undertaken to compile the archaeological baseline and the ongoing discussions to secure appropriate mitigation for the impact of the scheme. This is not repeated here.
- 8.11 A Draft Archaeological Mitigation Strategy [**APP-209**] was submitted which SYAS was in broad agreement with other than noting that minor revisions would be required upon submission of the final trial trenching evaluation report. That report was shared with SYAS in February 2025 allowing more detailed discussions to take place between the parties. Subsequently, seventeen areas have been identified as containing archaeological remains susceptible to harm from the scheme and a range of mitigation measures have been proposed. Two further areas may be added to the list following further evaluation works. Firstly, due to ecological constraints during the first phase of trial trenching, three fields were inaccessible for evaluation. Provision has been made to complete these works as part of the mitigation strategy including any further works required to ensure recording or preservation. Secondly, the grid connection method has not been finalised. If the grid connection corridor option is progressed, allowance for all required evaluation surveys and any follow-on mitigation measures has been made.
- 8.12 As significant design decisions have still to be made, it has not been possible to agree a final archaeological mitigation strategy at this stage. Instead, a

¹¹ [South Yorkshire archaeology service | Sheffield City Council](#)

Framework Archaeological Mitigation Strategy (FAMS) has been prepared. SYAS have confirmed that it agrees with this approach and the **FAMS** document has been prepared in close consultation with them. It sets out in sufficient detail parameters and procedures for future archaeological work in connection the scheme and it has been agreed in principle subject to minor final edits.

- 8.13 Turning to Requirement 10 (archaeology) of the Draft DCO, following discussions with SYAS, the Applicant has agreed to make certain changes which SYAS and the Council are content with. The Council understands the agreed changed will be included in the version of the Draft DCO the Applicant will submit at Deadline 1.
- 8.14 In relation to archaeology, whilst there is the potential for below ground remains to be encountered, the scope and extent of the remains, as a result of the field evaluation works undertaken to date, do not suggest these to be of national significance warranting preservation *in situ* as required through DLP Policy 39. The proposed works within the Solar PV Site comprise the installation of the Solar PV Panels, cutting of trenches for cabling, ground levelling for installation of Solar PV Panels, as well as the installation of access roads and other supporting infrastructure for the Solar PV Panels. The proposed works have the potential to result in physical impacts to these assets if encountered. However, (as confirmed by SYAS) the staged approach of understanding the archaeological potential of the site (through field evaluation i.e. geophysical survey and trial trenching) accords with Policies 35 and 39 of the DLP as sufficient information has been provided on the potential impacts to the Historic Environment.
- 8.15 Further archaeological mitigation fieldwork in order to preserve any encountered remains ‘by record’ or through design measures (such as the use of pre-cast concrete blocks rather than piled mounts within the Solar PV Site) to enable preservation in-situ of archaeological remains or micro-siting of Scheme elements is to be safeguarded through the requirement for a **Final Archaeological Mitigation Strategy** to be developed substantially in accordance with the **Framework Archaeological Mitigation Strategy**, as set out above.
- 8.16 With these considerations in mind, it is concluded that the requirements of policies 34, 35, 36, 37 and 39 are suitably met and accordingly, the Council views the impacts of the proposed development as having a **neutral** impact.

9. Ecological and Biodiversity Net Gain Impacts

Key DLP Policies

- Policy 29: Ecological Networks
- Policy 30: Valuing Biodiversity and Geodiversity

- Policy 31: Local Wildlife and Geological Sites
- Policy 32: Woodlands, Trees and Hedgerows

9.1 Policy 29 states that proposals will only be supported which deliver a net gain for biodiversity and protect, create, maintain and enhance the Borough's ecological networks by:

A) being of an appropriate size, scale and type in relation to their location within and impact on the ecological network

B) maintaining, strengthening and bridging gaps in existing habitat networks

C) planting native species and creating new, or restoring existing, national and local priority habitats and/or species and

D) working with strategic partnerships to deliver conservation projects at a landscape scale where appropriate.

9.2 Policy 30 explains that the Borough has a range of internationally, nationally, and locally important habitats, sites and species that will be protected through the following principles:

A) All proposals shall be considered in light of the mitigation hierarchy in accordance with National Policy.

B) Proposals which may harm designated Local Wildlife Sites, Local Geological Sites, Priority Habitats, Priority Species, protected species or non-designated sites or features of biodiversity interest, will only be supported where:

1. they use the DEFRA biodiversity metric to demonstrate that a proposal will deliver a minimum 10% net gain for biodiversity

2. they protect, restore, enhance and provide appropriate buffers around wildlife and geological features and bridge gaps to link these to the wider ecological network

3. they produce and deliver appropriate long term management plans for local wildlife and geological sites as well as newly created or restored habitats

4. they can demonstrate that the need for a proposal outweighs the value of any features to be lost and

5. if the permanent loss of a geological site is unavoidable, then provision will be made for the site to first be recorded by a suitably qualified expert.

C) Proposals which may impact Special Areas of Conservation, Special

Protection Areas or RAMSAR Sites will only be supported where it can be demonstrated that there will be no likely significant effects and no adverse effects on the integrity of European sites, unless there are no alternative solutions and it is justified by an “imperative reasons of overriding public interest” (IROPI) assessment under the Habitats Directives.

D) Proposals that may either directly or indirectly negatively impact Sites of Special Scientific Interest will not normally be supported. Proposals should seek to protect and enhance Sites of Special Scientific Interest and maintain, strengthen, and bridge gaps to link them to the wider ecological network wherever possible.

E) In order to ensure development does not negatively impact on nightjar populations, proposals located within 3km of Thorne and Hatfield Moors Special Protection Area, that impact habitats that nightjars may use for feeding on, will only be supported where they deliver a net gain in nightjar foraging habitat.

9.3 Policy 31 relates to local wildlife and geological sites will be identified and designated by the Council and are shown on the Policies Map. Other sites, including those awaiting designation, which can be demonstrated to meet the selection guidelines for Local Sites, will be afforded the same level of protection.

9.4 Policy 32 states that proposals will be supported where it can be demonstrated that woodlands, trees and hedgerows have been adequately considered during the design process, so that a significant adverse impact upon public amenity or ecological interest has been avoided. There will be a presumption against development that results in the loss or deterioration of ancient woodland and/or veteran trees. Proposals will need to include:

A) the submission of survey information of woodland, trees and hedgerows, as appropriate, to a recognised professional and fit for purpose standard which is able to demonstrate evaluation of these features for realistic long-term retention, and how this has positively informed the design process

B) demonstration of how retained features are to be protected during development

C) an adequate landscape buffer (which excludes built development and residential gardens) adjacent to existing woodlands, wildlife sites and at settlement edges

D) sufficient provision of appropriate replacement planting where it is intended to remove trees and hedgerows and

E) avoidance of the loss or deterioration of woodland.

Key Local Issues:

- 9.5 In respect of biodiversity net gain (“BNG”), there has been some debate between the Council and Applicant concerning how habitat below the solar panels is recorded, as set out in the Council’s Relevant Representation. However, the Council accepts that there will be a significant gain in the conversion of cropland to grassland regardless of how this is calculated.
- 9.6 The Council’s Relevant Representation also asked why a separate Amphibian Survey had not been undertaken. Clarification has since been provided in this respect in terms of the Applicant adopting a District Level Licensing approach, which is accepted.
- 9.7 Since submission of the Relevant Representation, the Council has questioned whether the Framework LEMP and CEMP [**APP-203 and APP-196 respectively**] contain suitable reference to Invasive Non-Native Species (“INNS”), Japanese knotweed, Himalayan balsam, cotoneaster plus some aquatic species. This is particularly important given that the site contains many rural verges and agricultural tracks and these features are very prone to the tipping and spreading of INNS. Crossing water bodies may also encounter INNS that have been washed downstream in times of high-water levels. The Council therefore considers it essential that the strategic management of INNS where encountered is built into the Framework CEMP at construction periods and the Framework LEMP to ensure long term management and eradication.
- 9.8 It is however understood that Table 3-3 of the Framework CEMP [**APP-196**] and paragraph 4.2.3 of the Framework LEMP [**APP-203**] provide this detail and the Council is satisfied it has been suitably addressed on this basis. It is expected that the Applicant’s Biosecurity Plan will provide adequate details of long-term monitoring i.e., frequency and season of monitoring visits and the duration before eradication can be confirmed [**APP-196, Table 3.3**].
- 9.9 Whilst in principle matters relating to ecology and biodiversity net gain are likely attributed with having a **positive** impact on the local area, the Council has provided the Applicant with some detailed feedback on the contents of the Framework LEMP [**APP-203**], which are subject to ongoing engagement to ensure they can be incorporated. These relate to matters including the detailed seed mix, engagement and management measures, the baseline BNG at the point of construction, post construction surveys and the process for making iterative changes to the LEMP.
- 9.10 Furthermore, the Council considers it crucial to ensure a suitable monitoring regime is in place for the lifetime of the development. It is the Council’s normal practice when determining Town and Country Planning Act applications, to

charge a monitoring fee through section 106 planning obligations, to cover the cost of monitoring and reporting on delivery of BNG. The Council would expect such a monitoring fee to be secured either through the detailed provisions of the DCO itself or a legal agreement. Discussions between the Council and the Applicant at the time of the LIR submission are ongoing to ensure this can happen.

10. Landscape and Visual Impact:

Key DLP Policies

- Policy 25: Development in the Countryside Area
- Policy 32: Woodlands, Trees and Hedgerows
- Policy 33: Landscape
- Policy 48: Landscaping of New Developments
- Policy 54: Pollution
- Policy 58: Low Carbon and Renewable Energy

10.1 Policy 25 (Part 4) relates specifically to new non-residential development proposals, setting out that these will be supported in the Countryside Policy Area (which the extent of the order limits sits within) provided that certain specified criteria are met. Relevant to the proposed development are (B), which sets out a requirement that locations would not have a significant adverse effect on neighbouring uses or on highway safety; and (D) which requires that the scale and design of the proposal would not have a significant adverse impact on the landscape.

10.2 Policy 32 relates to woodlands, trees and hedgerows, stating that proposals will be supported where it can be demonstrated that these matters have been adequately considered during the design process, so that a significant adverse impact upon public amenity or ecological interest has been avoided. There will be a presumption against development that results in the loss or deterioration of ancient woodland and/or veteran trees. Proposals will need to include:

A) the submission of survey information of woodland, trees and hedgerows, as appropriate, to a recognised professional and fit for purpose standard which is able to demonstrate evaluation of these features for realistic long-term retention, and how this has positively informed the design process

B) demonstration of how retained features are to be protected during development

C) an adequate landscape buffer (which excludes built development and residential gardens) adjacent to existing woodlands, wildlife sites and at settlement edges

D) sufficient provision of appropriate replacement planting where it is intended to remove trees and hedgerows and

E) avoidance of the loss or deterioration of woodland.

10.3 Policy 33 addresses landscape more specifically, setting out that proposals will be supported that take account of the quality, local distinctiveness and the sensitivity to change of distinctive landscape character areas and individual landscape features. Development will be permitted provided that it conserves, enhances and, where possible, restores:

A) the landscape character and local distinctiveness of the area including its historical, biodiversity, cultural character and its tranquillity

B) the distinctive setting of, and relationship between, settlements and buildings and the landscape including important views

C) the nature conservation value of the area including the pattern of woodland, forests, trees, field boundaries, vegetation and other features

D) the special qualities of rivers, waterways, wetlands and their surroundings and

E) the topography of the area including sensitive skylines, hillsides and geological features.

Policy 33 goes on to set out that where development proposals will most likely result in a significant impact on the Borough's landscape the proposals should assess the potential impact (including cumulative impact) and propose how any negative effects will be minimised. In doing so consideration should be given to:

F) alternative site selection

G) the scale, massing, design, form, layout, orientation and/ or operation of the development

H) the incorporation of suitable mitigation measures or

I) where suitable mitigation measures are not achievable on site, then development should provide appropriate compensation off site.

Landscape works shall be appropriate to the scale of the development in accordance with Policy 48.

10.4 Policy 48 then relates to the landscaping of new developments more specifically. This states that development will be supported which protects landscape character, protects and enhances existing landscape features, and

provides a high quality, comprehensive hard and soft landscape scheme that includes:

A) maximising links to wider Green Infrastructure in line with Policy 26¹²

B) the provision of Sustainable Drainage Systems and designs that facilitate floodplain compensation and preservation of flood flow routes where appropriate

C) generous tree, shrub and hedgerow planting consisting of appropriate species and nursery stock specified for the location, role and prominence of the landscape feature, and to provide year round interest

D) fit for purpose, attractive hard and soft landscaping including; planting, surfacing materials, boundary treatments and street furniture, for all external environments

E) appropriate, robust, low maintenance surfacing materials for public areas and the adoptable highway, which should include more attractive finishes (including block paving) in key focal spaces and lightly trafficked carriageways; and

F) a long-term management and maintenance strategy with clear responsibilities and regimes for the upkeep of all external areas.

10.5 Policy 54 (E) relates to the impact of artificial lighting, stating that it has the potential to cause unacceptable light pollution in the form of sky-glow, glare or intrusion onto other property and land. It sets out that development proposals should ensure that adequate and reasonable controls to protect the rural night sky are included within the proposals.

10.6 With specific reference to landscape impacts, policy 58(B) states that in all cases, low carbon and renewable energy proposals will be supported where they (inter alia):

2. have no unacceptable adverse effects on local amenity and air quality and include appropriate stand-off distances between technologies and sensitive receptors, such as residential areas;

5. have no unacceptable adverse impacts, including cumulative impacts, on the built and natural environment (including landscape character, and historic and nature conservation assets, such as Thorne and Hatfield Moors)

¹² Policy 26 sets out that the Council will protect, maintain, enhance and, where possible, extend or create Doncaster's green infrastructure (GI), including landscapes, ecological networks, natural environment, open spaces, public rights of way, geodiversity, biodiversity, navigable river and waterway assets, through a series of stipulated principles.

- 10.7 At paragraph 165(a) of the NPPF, it is recognised that whilst providing a positive strategy for energy, it should be ensured that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts).

Key Local Issues:

- 10.8 The Council has commissioned Land Use Consultants (LUC) to assist in the consideration of the landscape and visual impacts of the proposed development, and a detailed analysis was provided within the Council's Relevant Representation.
- 10.9 The Council has continued to engage with the Applicant on landscape matters, and maintains that there are opportunities for design alterations to the scheme with a view to reducing the impacts on the local community (for example where the development would wrap around them), allowing the development to be more compact by removing areas which extend out from the central core, beyond established screening features (woodland), or which give rise to relatively disproportionate levels of effects. Such an approach aligns with the policy requirements set out above.
- 10.10 Paragraph 4.7.1 of EN-1 states that the visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. Paragraph 4.7.2 goes on to state that applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area. Paragraph 4.7.6 acknowledges that applicants may not have any or very limited choice in the physical appearance of some energy infrastructure, but that there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, land form and vegetation. Paragraph 4.7.11 requires that the Secretary of State should be satisfied that the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape) as far as possible.
- 10.11 The Council accepts that paragraph 5.10.35 of EN-1 states that the scale of energy projects means that they will often be visible across a very wide area. Moreover, that the ExA should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project. Paragraph 5.10.36 of EN-1 goes on to state that in reaching a judgement, consideration should be given as to whether any

adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that is considered reasonable.

10.12 The site is not subject to any statutory landscape designation that would result in it being afforded a higher status of protection.

10.13 The Council concludes that the proposed development would have a **negative** impact on landscape character and visual amenity within the local area contrary to the policies set out above. This negative impact would be reduced if the opportunities for design alterations were taken forward. Ongoing discussions are continuing to take place with the Applicant to resolve any remaining points of difference in this respect wherever possible.

11. Socio-economic Impacts and land use:

Employment Generation:

Key DLP Policies

- Policy 2: Level of Growth
- Policy 3: Employment Allocations

11.1 Of particular note, Policy 3 (C) states that for employment or other developments that propose 20 or more direct jobs, the Council will seek to enter into a local labour agreement with the developer/applicant that sets out the following:

1. An agreed percentage target for local labour
2. A training and recruitment plan
3. Commitment to an agreed target for the proportion of local procurement of services and supplies.

Key Local Issues:

11.2 The DLP sets out that Doncaster has a relatively low proportion of people employed in highly skilled occupations and wage rates are significantly lower than the national average. Doncaster's economy is relatively reliant on lower skilled sectors that are more sensitive to changes in local demand. Compared to Yorkshire and Humber, our economy is relatively inward facing and more reliant on jobs in health, retail, transport, construction, and public administration. However, it does have significant jobs in several tradeable sectors, for example, manufacturing, engineering, and financial and professional services.

- 11.3 Recognised economic weaknesses at the time of local plan adoption include the following:
- Lower than average skill levels
 - Some rural areas have poor access to services and facilities.
 - Relatively high levels of unemployment and economically inactive residents
- 11.4 Reducing unemployment and worklessness and diversification of the rural economy are seen as key economic challenges, highlighted in the DLP.
- 11.5 In assessing the impact of the proposed development on socio-economics, the Council has had regard to ES Volume I Chapter 12: Socio-economics and Land Use [APP-226]. The socio-economic assessment considers the effects arising from employment generation, impacts on local services and facilities, comprising local accommodation services and Gross Value Added (GVA).
- 11.6 The estimated construction phase for the project is expected to be 12 months for the Grid Connection Corridor and 24 months for the Solar PV Site. Although construction jobs are temporary, they are still acknowledged to represent a positive economic effect for a period.
- 11.7 Whilst the Council accepts that the proposed development would not contribute to the wider economic aspirations for the Borough, which have been outlined above, it would be an important opportunity to utilise an existing local workforce nevertheless.
- 11.8 With this in mind, the Council suggests that the strategy could be more ambitious in respect of the number of people employed during construction within a 60-minute drive time. Furthermore, there is a strong local supply chain and labour force within Doncaster that could support delivery of the project, and this should be maximised through the detail provided through Requirement 16 (skills, supply chain and employment).
- 11.9 Overall, in the Council's view, the local impacts associated with construction employment in the construction and decommissioning phases would be **neutral** (albeit there would be a **positive local impact** during those phases which is recognised and supported, subject to the detail contained within Requirement 16 (skills, supply chain and employment)).
- 11.10 It is not possible to accurately quantify the level of construction workforce spending from direct employee expenditure over the construction phase. Whilst local businesses that are accessible to the construction site may experience greater benefits from employee spending, the spending impact on the local economy would be indirect, temporary and negligible/minor beneficial. In the Council's view the local impacts associated with construction workforce spending would be **neutral**.

Best and Most Versatile (BMV) agricultural land and soils

Key DLP Policies

- Policy 60: Protecting and Enhancing Doncaster's Soil and Water Resources

11.11 This sets out that proposals affecting land and water resources will be expected to comply with the following criteria:

A) Proposals on non-allocated sites that involve the significant loss of the best and most versatile agricultural land (grades 1, 2 and 3a) will only be supported where:

1. there are no other suitable alternative locations on lower quality agricultural land (or non-agricultural land) available; or
2. the land can be reinstated back to its previous state (where possible).

B) Developers will need to demonstrate through an on-site assessment the actual grading where significant development takes place on agricultural land.

C) Proposals will need to demonstrate that all practicable steps have been taken for soil resources to be conserved and managed in a sustainable way.

11.12 The NPPF at paragraph 187 recognises the economic and other benefits of the best and most versatile agricultural land. Footnote 65 within paragraph 188 of the NPPF requires where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. There is therefore a clear direction in national policy for solar farms to be located on brownfield and lower grades of agricultural land, which recognises the importance of balancing the need for sustainable energy whilst ensuring BMV is available for food production.

Key Local Issues

11.13 Detailed context on agriculture was provided in the Council's Relevant Representation **[RR-001]**, and this is not repeated here.

11.14 However, the Council did request that the applicant further consider excluding the south-western fields referenced 5/02 and the field to the north of this – as these areas contain both Grade 2 and subgrade 3a soils. This was considered to also have the consequence of creating a larger buffer between the development and Jett Hall/the settlement of Moss, which would have also been an improvement to the scheme overall in terms of further mitigating the landscape and visual impacts.

- 11.15 The Council does acknowledge that the overall loss of Best and Most Versatile agricultural soils within the context of the wider site is not deemed to be 'significant' as per the requirements of DLP Policy 60 due to the overall percentage loss of BMV as detailed previously in the Council's Relevant Representation **[RR-001]**. It is further acknowledged, however, that the ExA will need to weigh the harm arising from this minor loss against the public benefits of the proposed development.
- 11.16 It is also accepted that the development would meet the requirements of policy 60(A)(2) insofar that the loss of agricultural land would be for a temporary period, and the land can be reinstated back to its previous state following decommissioning.
- 11.17 The Council does however consider that during the lifetime of the development, there would be a **negative** effect on agricultural land, albeit this would be **neutral** longer term, once decommissioning had taken place, in accordance with DLP policy 60.

Public Rights of Way:

Key DLP Policies

- Policy 18: Development Affecting Public Rights of Way
- Policy 19: Access, Design and Layout of Public Rights of Way
- Policy 20: Public Rights of Way Crossing Roads, Railways, Canals and Rivers

11.17 Policy 18 states as follows:

A) Where new developments affect public rights of way, the public right of way should be retained and wherever possible be on the legally recorded alignment. Where a public right of way is affected the development should be designed to accommodate the route following the principles outlined in Policy 19.

B) Where development leads to the diversion of an existing right of way, a suitable alternative must be established, following the principles outlined in Policies 19 and 20.

C) Development will not normally be allowed to lead to the closure of a public right of way unless a suitable replacement can be established.

D) Developers will be expected to consider any unrecorded public paths that cross development sites and treat them in the same way as definitive public rights of way.

E) Proposals will be supported that enhance the Trans Pennine Trail, particularly those that create off-road sections for all users.

11.18 Policy 19 sets out the requirements that development proposals will be expected to meet in terms of access, design and layout, as follows:

A) Developers will be expected to incorporate the principles of least restrictive access in the design and layout of public rights of way as part of the development.

B) Wherever possible, any existing or alternative route alignments through development sites should run through open, landscaped areas and should:

1. avoid the use of estate roads;
2. avoid alignments enclosed by fencing with little or no surveillance from adjacent buildings;
3. be free from sharp bends which could provide blind spots and hiding places;
4. be suitably surfaced to a specification agreed with highway authority; and
5. be free from barriers.

Barriers should be considered as a last resort and will only be authorised where there is clear justification. Agreed structures will need to be the least restrictive and conform to the British Standard for Gaps Gates and Stiles.

C) Where paths are not enclosed, minimum widths of 2 metres for footpath and 4 metres for bridleway and restricted byways should be provided. If it is necessary for the path to be enclosed by fencing, hedging or buildings, then minimum widths of 3 metres for footpaths, 5 metres for bridleways and 6 metres for restricted byways should be provided.

D) Any new routes or altered alignments through development should link into the surrounding public rights of way network or adopted highway network to maintain and improve connectivity and ease of movement.

E) New routes should have formal status and be recorded on the appropriate legal record. This will secure the long-term protection of the route and formalise responsibility for maintenance.

11.19 Policy 20 requires that new development proposals that are expected to give rise to significant increase in the use of public rights of way where they cross roads, railway lines, canals and rivers must show that all safety and accessibility considerations have been taken into account to ensure use of the crossing can be maintained.

Where necessary, existing structures (for example bridges or underpass) should be assessed, and improvements made to meet the requirements of any projected increase in use of the public rights of way network.

Lengthy diversions of a public right of way, as an alternative to either a bridge or underpass, will not be supported. Diversion of a public right of way may be considered as a last resort but only where it does not detract from its use and enjoyment.

Where necessary, new crossing points should be provided across new roads, railway lines and waterways where there is a need to provide safe convenient access and to maintain connectivity.

Key Local Issues

- 11.20 There are several PROW located within the Order limits and the immediate vicinity. The PROW which pass through or border the Order limits and form part of a wide network of PROW in the surrounding area are presented in Table 1 of the Framework Public Rights of Way Management Plan [APP-202]. There is further reference to another 22 PROW that are either located along or abutting the Solar PV Site, but do not traverse it. In total there are 24 PROW located within the Grid Connection Corridor Study Area, one of which is a bridleway. Of these, nine are either located entirely within the Grid Connection Corridor or pass through it and continue outside of it. The PROW network itself mainly comprises public footpaths, some of which are utilised by equestrian users.
- 11.21 The Council notes that access to all existing PROW will be retained during construction, along with a limited number of PROW diversions necessitated by the Scheme overall.
- 11.22 Careful regard has been had to the wording of the draft DCO, ES Volume I, Chapter 12: Socio Economics and Land Use [APP-226] and in particular to the Framework Public Rights of Way Management Plan [APP-202].
- 11.23 As part of the Council's Relevant Representation [RR-001], concerns were raised regarding the maintenance of PROWs. The Framework Public Rights of Way Management Plan [APP-202] at Section 3.5 outlines how PROW will be managed by the applicant to ensure they have been suitably considered and be able to operate as well as possible, in terms of both user safety and accessibility. This includes the following requirements:
- A) to give advanced notice of any PROW management measures
 - B) fencing around the solar PV site to ensure preservation of PROW during construction
 - C) use of a minimum buffer of 20m (or 30m for the BESS) either side of the centre line of the PROW

- D) increased visibility of construction vehicles
- E) traffic management measures
- F) use of manned crossings /banksmen with a default priority for construction traffic to give way to other users and
- G) reinstatement of the existing PROW whilst retaining public access.

11.24 It is noted that Requirement 17 (public rights of way) of the Draft DCO requires the submission of a detailed Public Rights of Way Management Plan to be approved in due course by the Council and that this must be substantially in accordance with the Framework Public Rights of Way Management Plan and subsequently implemented as approved. Engagement with the Council regarding maintenance and the minimum widths of PROWs will therefore continue during the preparation of the Public Rights of Way Management Plan and the Operational Environmental Management Plan which are both secured by Requirements 12 (operational environmental management plan) and 17 (public rights of way) of the Draft DCO **[APP-220]**. The Council raises no objection to this approach.

11.25 Furthermore, there is some detailed wording contained within the Draft DCO which require correction or addition, which the Council would expect to be included in the final version.

11.26 Provided that these aspects are fully addressed, the Council is satisfied that the impacts during the construction phase can be satisfactorily addressed through a Public Rights of Way Management Plan and there will be no conflict with DLP Policies 18 and 19 in these respects. Whilst it is inevitable that users of some PROW will experience effects primarily during construction, and subsequently through operation and decommissioning of the Scheme, these impacts are to be mitigated through the submission and approval of the Public Rights of Way Management Plan.

11.27 Subject to the above matters being fully addressed, primarily through the detailed provisions contained within the DCO, there is considered to be an overall **neutral** impact.

12. Transport and Access

Key DLP Policies

- Policy 12 – Strategic Transport Network
- Policy 13: Promoting Sustainable Transport in New Developments

12.1 Policy 12 states that developments which generate large volumes of freight traffic or involve the transport of bulk materials should be located close to the strategic transport network, where this can be accommodated within the

existing capacity of the network. The network capacity will need to be established through the submission of a Transport Assessment (TA). Routing agreements will be required where deemed appropriate.

- 12.2 Policy 13 sets out the requirements that proposals are required to meet in respect of promoting sustainable modes of transport to protect the highway network from residual vehicular impact.

Key Local Issues

- 12.3 The Council considers that the most significant transport and access impacts will be associated with the construction and eventual decommissioning phases of the proposed development. Once operational, it is understood that the proposed development is likely to generate a minimal number of vehicular trips associated with ongoing maintenance and management of the site overall.
- 12.4 During the construction phase of the development a significant number of HGV and LGV traffic will be generated through the delivery of solar panels, mounting equipment and associated infrastructure. Additionally, Abnormal Indivisible Loads (AIL) will be associated with the implementation of the On-Site Substation, with up to five AILs anticipated to be delivered during the construction phase.
- 12.5 It should be noted that the local highway network surrounding the site is predominately comprised of narrow country lanes that are typical of the rural location. As such, the road network is not designed to be accessed by large HGVs and there are limited safe and convenient routes for construction traffic and maintenance vehicles to access the site without causing disruption to the network, and other users of the network including local businesses.
- 12.6 Careful regard has therefore been had to the Framework Construction Traffic Management Plan [**APP-206 & APP-207**], and the HGV Routing Strategy included within the Plan, which are considered to be fit for purpose. The Council would highlight the importance of HGVs not travelling through Fenwick village at any time and notes that the HGV Routing Strategy Plan [**APP-230, Figure 13-3**] accounts for this and that no such journeys are proposed.
- 12.7 Within the site itself, internal haul roads will be established to provide construction access. The submitted details in this respect show the swept path manoeuvres required by either the proposed tractor and trailer or the 16.5m articulated HGV. All the swept paths produced on these drawings, along with any proposed widening measures, could accommodate the proposed vehicle using it, with some of the existing access points needing minimal work. This is therefore considered to be acceptable from a highway safety perspective.

- 12.8 It is Council policy¹³ to utilise Section 278 of the Highways Act 1980 agreements to licence a developer to carry out improvement works on public highway which are generally necessary where planning permission has been granted for a development. This has been highlighted to the Applicant, who agrees that the normal requirements contained within the Council's template agreement can be replicated through the agreements to be entered into under Article 15 (agreements with street authorities) of the draft DCO. This approach is welcomed.
- 12.9 The Council operates the "Doncaster Permit Scheme"¹⁴ which sets out that anyone intending to carry out work on all streets must apply for a permit which sets out how the work must be undertaken to minimise disruption to the network. The Council has requested that the requirements of the Permit Scheme Document¹⁵ be enshrined within the DCO itself to ensure the effective ongoing management of the highway network during the construction phase of the development. The Council understands that the updated draft DCO that will be submitted at Deadline 1 will include new article 8A which will provide for the application of the Council's permit scheme to the project.
- 12.10 Provided these aspects are fully addressed within the final DCO itself, the Council is satisfied that the impacts during the construction phase on the local highway network can be satisfactorily addressed and there will be no conflict with the policies cited above in these respects.
- 12.11 The Council has previously questioned the status of the applicant/statutory undertaker for the purposes of the works with the Applicant, as this has a bearing on the permitting scheme itself. The applicant has since confirmed that cables will be adopted by Eclipse Power, understood to be an Independent Distribution Network Operator, which is acceptable from a street works perspective.
- 12.12 Accordingly, matters relating to Transport and Access, subject to the above matters being fully addressed through the detailed provisions contained within the DCO, are considered to have a **neutral** impact overall.

13. Noise and Vibration

Key DLP Policies

- Policy 54: Pollution

- 13.1 Policy 54 sets out that development proposals that are likely to cause pollution, or be exposed to pollution, will only be permitted where it can be demonstrated

¹³ [Work on Public Highways \(Section 278 Agreement\) - City of Doncaster Council](#)

¹⁴ [The Doncaster Permit Scheme - City of Doncaster Council](#)

¹⁵ [YORKSHIRE PERMIT SCHEME](#)

that pollution can be avoided, or where mitigation measures (such as those incorporated into the design and layout of development) will minimise significantly harmful impacts to acceptable levels that protect health, environmental quality and amenity.

13.2 The Council's Relevant Representation **[RR-001]** set out that the Framework CEMP and DEMP **[APP-196 & APP-198]** remained under review by CDC at the time of writing, and more detailed consideration would be set out in the Local Impact Report. It is accepted that Requirement 14 (operational noise) of the DCO is intended to address operational noise and on this basis, subject to adequate mitigation, the requirements of policy 54 would be met.

13.3 In the Council's view the local impacts associated with noise and vibration, subject to the proposed mitigation, would be **neutral**.

14. Glint and Glare

Key DLP Policies

- Policy 58: Low Carbon and Renewable Energy

14.1 Policy 58(B) sets out that in all cases low carbon and renewable energy proposals will be supported where they (inter alia) allow the continued safe and efficient operation of Doncaster Sheffield Airport.

14.2 Since adoption of the DLP, the Doncaster Sheffield Airport has closed. Since then, reopening the airport has been a key strategic priority for the Council and continues to be, with a plan for passenger flights to resume in Spring 2026¹⁶. As such, throughout the process to date the Council has requested that the baseline for all relevant assessments within the ES is with the airport as fully operational, and this has been taken forward.

14.3 At the point of submitting its Relevant Representation **[RR-001]**, the Council noted that on this basis the ES states there are no such impacts for the receptors at Doncaster Sheffield Airport, and that verification was being sought on this matter from an airport safeguarding perspective.

14.4 The Council is now able to confirm that it has no further submissions to make in this respect other than to note that the assessment does not model the reflections against any flight profiles and directly from Air Traffic Control. Given that the airport is not currently operational (albeit private flights are operating), the difficulties in making this assessment are accepted. As detailed above, the re-opening of the Airport is one of the Council's top priorities¹⁷ and has local, regional and national implications. It is therefore imperative that the future

¹⁶ [Doncaster Sheffield Airport Statements - City of Doncaster Council](#)

¹⁷ [CDC Document Title](#)

successful operation of the Airport, once reopened, is not jeopardised as per the requirements of DLP Policy 58 Part B, 3. The Council would therefore request that consideration be given to a mechanism for longer term monitoring and mitigation in the event that reports from aerodrome users are received. This has been raised with the Applicant for consideration/response.

14.5 Overall, in the Council's view the local impacts associated with glint and glare would be **neutral, subject to the above**.

15. Draft Development Consent Order

15.1 The Council has reviewed the Draft DCO [APP-220] and has commented on it on a topic-by-topic basis above. At the time of writing, discussions between the parties on the detailed wording of the draft DCO are continuing. To date, those discussions have included the following topics:

- The drafting of “permitted preliminary works” (article 2);
- The drafting of Part 3 (streets): in summary, the Council is concerned by the broad range of powers the Applicant proposes to give itself, without the need for the Council's consent, under this Part. The Council considers Part 3 can be made acceptable (i) by drafting amendments to it, (ii) by providing for the application of the Council's permit scheme to the application, and (iii) by providing that the highway works proposed under this Part will be carried out in accordance with the Council's standard section 278 agreement;
- Where the Council's consent is required, the Council should be able to attach reasonable conditions to that consent. (Certain articles provide for this; however, others do not, and the Council seeks consistency in this regard);
- The drafting of article 21(3)(b) (time limit for exercise of authority to acquire land compulsorily), where the Council does not consider the time should be “rounded up” to one year;
- The drafting of article 45(1) (procedure in relation to certain approvals etc.), where the Council considers the inclusion, at the end, of “or delayed” is unnecessary because of the deeming provision included at article 45(3);
- The drafting of certain Requirements (for example Requirements 7 (biodiversity net gain), 10 (archaeology) and 18 (decommissioning and restoration) and, in respect of Requirements 7 and 10, the control documents secured by them, namely the framework landscape and ecological management plan and the framework archaeological mitigation strategy;
- Corrections to Schedule 6 (streets and public rights of way), (for instance, the correction of typos in Parts 3 and 4 and the deletion of the first row of Part 5 (temporary use of motor vehicles on public rights of way);
- The drafting of paragraph 5 (fees) of Schedule 15 (procedure for discharge of requirements). This is a key provision for the Council who consider the Applicant and Council should enter into a Planning Performance Agreement (“PPA”) to provide for the full costs recovery of the time spent by officers in determining applications for consent under articles and requirements. Further

detail on this point is set out in the Council's Post-Hearing Submission for ISH1. The Council has agreed to provide the Applicant with its proposed form of PPA and it is hoped that discussions on that document will begin shortly. On another costs point, owing to the Biodiversity Net Gain monitoring that the Council will have to undertake under the project, a robust mechanism for the recovery of its costs in doing so is required.

- 15.2 The Applicant has shared updated versions of the draft DCO with the Council since ISH1 and the Council is grateful for this approach. The latest version was shared on 24 April 2025 and, at the time of drafting this document, the Council was finalising its response to the Applicant.

16. Conclusions:

- 16.1 This LIR has considered the potential impacts of the Fenwick Solar Farm NSIP at the local level in respect of the City of Doncaster administrative area, within which the whole development will be located. It has considered positive, negative and neutral impacts, within the context of its knowledge and understanding of the area.

- 16.2 While it is noted that the delivery of renewable energy of this nature is in accordance with key strategic policies of the Doncaster Local Plan, offering in principle support for such development, this is subject to a number of detailed considerations regarding the impacts of the proposed development.

- 16.3 The ExA will need to be satisfied that any residual impacts arising from the proposed development can be outweighed by the public benefits brought about by the proposed development.

- 16.4 Of the matters that fall within the Council's jurisdiction **positive** local impacts have been identified in terms of:

- Contribution to the production of renewable energy in the Borough
- Ecological benefits and biodiversity net gain arising from the development (subject to ongoing engagement between the Council and Applicant on the detailed content of the Framework LEMP) .

- 16.5 Of the matters that fall within the Council's jurisdiction, we have identified some potential **negative** local impacts, which can be summarised as follows:

- The scale and significance of the impact on the landscape and visual amenity of the area.
- Loss of a small proportion of best and most versatile agricultural land for the lifetime of the development, albeit this would be **neutral longer term**, once decommissioning has taken place.

16.6 Of the matters that fall within the Council's jurisdiction the following **neutral** local impacts have been identified, subject to appropriate mitigation where necessary, and are listed below:

- The impacts associated with construction workforce spending and construction supply chain effects.
- The impacts associated with construction employment, albeit these would be **positive at a local level** in the short term.
- The impacts arising from noise and vibration effects.
- The impacts associated with glint and glare effects (also subject to ongoing monitoring where necessary).
- The impacts on cultural heritage, including below ground.
- The impacts on transport and access arrangements on the local highway network
- The impacts on the local network of public rights of way.