The Planning Inspectorate

Application by Fenwick Solar Farm Ltd for an Order Granting Development Consent for Fenwick Solar Farm Project

The Examining Authority's first written questions and requests for information (ExQ1)

Issued on Friday 9 May 2025

The following table sets out the Examining Authority's (ExA's) first set of written questions and requests for information - ExQ1.

Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as Annex D to the Rule 6 letter of 10 July 2023. The questions have arisen from the ExA's consideration of the application documents and representations. The answers to them will help the ExA to consider the application against relevant legislation and policy.

Column 2 of the table indicates who each question is directed to. Please could each party answer all questions directed to them, providing a substantive response, or indicating why a question is not relevant to them. This does not prevent an answer to any question being provided by any party if it is relevant to their interests.

References in these questions set out in square brackets (eg [APP-010]) are to documents catalogued in the Examination Library, which provides a link to each document: Examination Library.

When you are answering a question, please start your answer by quoting the question reference number.

If you are responding to a small number of questions, then answers in an email or letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on the one below to set out your responses. An editable version of this table in Microsoft Word is available on request from the case team: please email FenwickSolar@planninginspectorate.gov.uk and include 'Fenwick Solar Project' in the subject line of your email.

All references to the draft Development Consent Order (dDCO) are to revision 02 submitted at deadline 1 [REP1-005].

Responses are due by deadline 2 on Wednesday 28 May 2025.

Abbreviations used

AEP	*Annual Exceedance Probability*
AGL	*Above Ground Level*
AIL	*Abnormal Indivisible Load*
ALC	*Agricultural Land Classification*
BESS	*Battery Energy Storage System*
BMV	*Best and Most Versatile land*
BNG	*Biodiversity Net Gain*
BoR	*Book of Reference*
BS	*British Standard*
CA	*Compulsory Acquisition*
CAPS	*Consents and Agreements Position Statement*
CDC	*City of Doncaster Council*
CTMP	*Construction Traffic Management Plan*
FAMS	*Framework Archaeological Mitigation Strategy*
FRA	Flood Risk Assessment
fSMP	Framework Soil Management Plan
dB	*Decibel*
DCO	*Development Consent Order*
dDCO	*Draft Development Consent Order*
DRA	*Dust Risk Assessment*
EA	*Environment Agency*
EIA	*Environmental Impact Assessment*
ES	*Environmental Statement*
ExA	*Examining Authority*
fBSMP	*Framework Battery Safety Management Plan*
fCEMP	*Framework Construction Environmental Management Plan*
fCTMP	*Framework Construction Traffic Management Plan*
fDEMP	*Framework Decommissioning Environmental Management Plan*
fLEMP	*Framework Landscape and Ecological Management*
fOEMP	*Framework Operational Environmental Management Plan*
fPRoWMP	Framework Rights of Way Management Plan
m	*Metre*
MMP	*Materials Management Plan*

fSSCEP	Framework Skills, Supply Chain and Employment Plan
fSWMP	*Framework Site Waste Management Plan*
ha	*Hectare*
HDD	*Horizontal Directional Drilling*
HGV	*Heavy Goods Vehicle*
HRA	*Habitats Regulation Assessment*
IDB	*Internal Drainage Board*
IPs	*Interested Parties*
ISH	*Issue Specific Hearing*
km	*Kilometre*
LIR	*Local Impact Report*
LOAEL	*Lowest Observed Adverse Effect Level*
LPA	*Local Planning Authority*
MSA	*Mineral Safeguarding Area*
MW	*Megawatt*
NETS	*National Electricity Transmission System*
NFCC	National Fire Chiefs Council
NPS	*National Policy Statement*
NSER	*No Significant Effects Report*
ODPS	*Outline Design Parameters Statement*
OMH	*Open Mosaic Habitat*
PA 2008	*Planning Act 2008*
PDL	*Previously Developed Land*
PRoW	*Public Right of Way*
PV	*Photovoltaic*
R	*Requirement*
RR	*Relevant Representation*
s	*Section*
SAC	*Special Area of Conservation*
SMP	*Soil Management Plan*
SOAEL	*Significant Observed Adverse Effect Level*
SoCG	*Statement of Common Ground*
SoR	*Statement of Reasons*
SoS	*Secretary of State*
SPA	*Special Protection Area*

SSSI	*Site of Special Scientific Interest*
SuDS	*Sustainable Drainage Systems*
TP	*Temporary Possession*
TCPA 1990	*Town and Country Planning Act 1990*
WR	*Written Representation*
ZTV	*Zone of Theoretical Visibility*

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Ref:	Question to:	Question:
1.	**The draft Development Consent Order and other consents**	
1.1.1	Applicant	**Article 2 (Interpretation) - Definition of 'order land'** Please review the definition of 'order land' in Article 2 and consider whether it could be more precisely defined so it aligns with the approach used in other made solar Development Consent Orders (DCO) (e.g. by reference to the different colouring on the land plans).
1.1.2	Applicant	**Article 2 (Interpretation) – Definition of 'commence'** The definition of 'commence' is tied to s.56(4) of the Town and Country Planning Act 1990 (TCPA 1990), which appears incorrect. Please review and consider whether the definition should instead refer to s.155 PA 2008.
1.1.3	Able Uk Limited/Elba Securities Limited	**Article 13 (Use of private roads)** - The ExA notes that the applicant updated Article 13 at deadline 1 to limit the scope of this power. Please comment on the updated article and whether or not it addresses the concerns raised in relation to this article as set out in your deadline 1 submission [REP1-057].
1.1.4	Applicant	**Article 14 (Access to works)** Please explain why this article does not require the undertaker to restore any temporary access created to the reasonable satisfaction of the street authority.
1.1.5	Applicant	**Article 15(1) (Agreements with street authorities)** The ExA notes that the reference to Article 10(1) in 15(1)(c) was modified by the SoS in the Cottam Solar Farm Correction Order so that it applies to the whole of Article 10. Please amend accordingly or provide an explanation as to why it should not be amended.
1.1.6	Applicant	**Article 16(5)(c) (Traffic regulation measures)** The ExA notes that this provision has appeared on other recently made DCOs. However, it is unclear what information it is referring to and whether or not it should also be subject to a timescale as in (a) and (b). Please review the drafting.

Ref:	Question to:	Question:
1.1.7	Applicant	**Article 18 (Protective works to buildings)** Paragraph 5.4.3 of the Explanatory Memorandum [REP1-007] explains that this article is required because there are buildings within, and in close proximity to, the order land that might require surveys and protective works. The applicant is asked to identify these buildings and explain the nature of protective works likely to be required.
1.1.8	Applicant	**Article 20(1)(b) (Compulsory acquisition of land)** Please review the reference to 'undertaking' – should this be 'authorised development'?
1.1.9	Applicant	**Article 29(1)(b) (Temporary use of land for constructing the authorised development)** Please provide further justification for the inclusion of the power to remove buildings and drainage on land temporarily used to construct the authorised development. Please identify any known buildings or drainage likely to be affected.
1.1.10	Applicant	**Article 29 and Article 30 (Temporary possession)** The ExA notes that Article 29(1)(a)(ii) extends the power to take temporary possession to any of the order land. (a) Please can the applicant explain the steps that have been taken to alert all landowners/occupiers of land within the order limits of this possibility. (b) Please can the applicant justify the 14-day period set out in Article 29(3). (c) Please can the applicant explain why it considers only 28 days' notice should be required before entering on and taking possession of land under Article 30(3).
1.1.11	Applicant	**Article 35 (Consent to transfer the benefit of the order)** The ExA notes that Article 35(6) provides for a notification period of 10 working days in the event of a transfer of the benefit of the order in circumstances where the consent of the SoS is not required. The ExA notes that the majority of made solar DCOs include a minimum period of 14 working days for the undertaker to notify the SoS of a transfer not requiring consent. The ExA considers this is a good indication of the SoS's preferred notice provisions. Please amend this provision so that it accords with the majority of other made

Ref:	Question to:	Question:
		solar DCOs or provide an explanation as to why, in the context of his particular application, a shorter period should be applied.
1.1.12	All IPs who fall within the definition of 'consenting authority' under Article 45(7)	**Article 45 (Procedure in relation to certain approvals etc)** Please comment on the deemed consent provisions set out in Article 45(4) and confirm whether or not your organisation is content with the eight-week period for determination.
1.1.13	Applicant	**Schedule 1 (Authorised development**) - Does the applicant consider references in this Schedule to gross electrical capacity should specify alternating current in order to provide certainty.
1.1.14	Applicant	**Schedule 1 – Work No.4 (b)** – please correct the typographical error in "Thorp Marsh Substation".
1.1.15	Applicant	**Schedule 1 – Work Nos 4 & 5**. Paragraph 2.6.36 of ES Chapter 2: the Scheme [APP-054] explains that the line drop option has been incorporated into the scheme as an alternative to the grid connection corridor. Similarly, paragraph 3.2.9 of the Planning Statement [APP-246] states that the connection to NETS will be either via underground cabling along the grid connection corridor or via the line drop option. It goes on to state that should the line drop option be feasible, it would supersede the requirement for grid connection cables along the corridor and the line drop would be confined to the Solar PV Site. However, paragraph 14.7.15 of the planning statement [APP-246] and paragraph 14.7.37 of ES Chapter 14: Other Environmental Topics [APP-066] explains that although the connection itself to the Line Drop would remain under National Grid's control, the timing of the works for the modification of the tower to connect the scheme to the NETS may coincide with the timing of the cable laying in the grid connection corridor and therefore has potential for cumulative effects. The ExA notes that the DCO makes provision for both options. Please confirm whether only one of the two options would be sought and explain how the DCO is drafted to ensure that, if the line drop option is considered viable, it is the only option taken forward. Please also explain the basis upon which such a decision will be made.
1.1.16	Applicant	**Schedule 2 (Requirements**) - The ExA notes that Schedule 2, R2(3) provides that any approval, agreement or confirmation required from a relevant planning authority under any of the requirements must be given in writing. In light of this, please consider whether the words 'in writing' are required in R4(1) and R10(1).

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1.1.17	Applicant	**Schedule 2 – Requirement 6 (BNG) –** The BNG Assessment [REP1-023] predicts a net gain of 36.46% for area habitat, 62.75% for hedgerow units and 24.97% for watercourse units. The applicant indicated at ISH1 that it would seek to achieve a minimum BNG of 10% across all habitat types. Please explain how the DCO will ensure that BNG will be secured across all habitat types.
1.1.18	Applicant	**Schedule 2 (Requirements)** – **Requirement 8**. The ExA notes that the Outline Design Parameters (ODPS) Statement [APP-193] includes various outline parameters which relate to fencing. Should this requirement require the details submitted to be substantially in accordance with the relevant outline design parameters?
1.1.19	Applicant	**Schedule 4 (Streets subject to street works)** – The ExA notes the use of the words 'within proximity of' in this schedule are insufficiently precise. Please amend to a more precise form of words (eg. 'between points [x] and [y]') or provide a further justification for their use.
1.1.20	Applicant	**Schedule 5 (Alteration of streets**) – Part 1 - please consider whether a more precise description of the proposed alterations can be included in column 3 of Part 1. Please explain the meaning and purpose of the words 'subsequent to improvements to adjoining field access'.
1.1.21	City of Doncaster Council	**Schedule 15 (Procedure for discharge of requirements)** – Please confirm that the Council is content with the eight-week period set out in Schedule 15, Paragraph 2(2).
1.1.22	Applicant	**Schedule 15 (Procedure for discharge of requirements)** • Paragraph 4(2)(a) – please check reference to paragraph 2(1). • Paragraph 4(2)(c) - Please remove the word 'forthwith'. Paragraph 4(4) – Please correct the typographical error in the final line (ie reference to paragraph '2(f)').
1.1.23	Applicant	Please confirm whether any land within the order limits falls within the order limits of any other made (or proposed) DCO or within the red line boundary of any extant planning consent and if so, how the applicant proposes to deal with any interaction in the dDCO.
1.1.24	Applicant	Does the applicant, having viewed the RRs and WRs, anticipate including additional protective provisions in the dDCO? If so, please provide details.

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2.	**General and cross-topic matters**	
1.2.1	Applicant/National Grid	ES Chapter 2: The Scheme [APP-054] explains that the feasibility of connecting the On-Site Substation via a line drop from existing overhead lines is being explored. Furthermore, it indicates that the determination of this option's viability will only be possible after any DCO consent has been granted. Please explain why it is not possible to determine the viability of a line drop option prior to any consent being granted.
1.2.2	Applicant	ES Chapter 2: The Scheme [APP-054], Table 2-1 sets out the design parameters that were assessed within the ES (See paragraph 2-5-10). This includes a maximum footprint of the BESS area of up to 250m by 200m. This parameter does not feature in the ODPS [APP-193]. Please update the ODPS so that it captures all of the maximum parameters as set out in Table 2-1.
1.2.3	Applicant	The ODPS [APP-193] explains that for field station configurations (b) and (c), string inverters would either be mounted parallel to the Solar PV Tables, or more likely be mounted at the end of the Solar PV Table frame. It goes on to state that **'one single string inverter unit could be utilised for approximately every 10 to 12 Solar PV Tables'**. Please clarify whether the text in bold is intended to operate as a maximum parameter and amend the wording of the ODPS to remove any uncertainty.
1.2.4	Applicant	Page 5 of the ODPS [APP-193] includes a design parameter to ensure all field stations are located outside of Flood Zones 2 and 3. However, on page 6 it states, in relation to field station configurations (b) and (c), that 'due to the location of some Solar PV Panels in Flood Zone 2 and Flood Zone 3, the maximum height of string inverters in these Flood Zones is expected to be up to 2m AGL.' Please explain this apparent inconsistency.
1.2.5	Applicant	The ODPS [APP-193] includes design parameters for the external finishes for field stations for configuration (c) only, ensuring that where this configuration is used the transformers and switch gear cabins are in keeping with the prevailing surrounding environment. Please explain why a similar design parameter is not included for configurations (a) and (b).
1.2.6	Applicant	Paragraph 1.2.4 of the ODPS [APP-193] explains that maximum parameters for the temporary constructions and decommissioning compounds were not included because the parameters for these temporary compounds is already provided for on the Works Plan [APP-214] and the Framework Construction Environmental Management Plan (fCEMP) [REP1-019]. Please state the maximum parameters for the

Ref:	Question to:	Question:
		temporary construction and decommissioning compounds and signpost where in the fCEMP this information can be found.
1.2.7	Applicant	There appears to be contradictory text between the ES chapters as to whether the construction works (construction of the solar PV site and construction of the grid connection corridor) would be carried out in tandem or sequentially. Examples are: • ES Chapter 2: The Scheme [APP-054] paragraph 2.7.1 – start in tandem • ES Chapter 8: Ecology [APP-060] paragraph 8.6.2 – due to sequential nature of the construction programme • ES Chapter 14: Other Environmental Topics [APP-066] paragraph 14.2.36 – construction will not be occurring across the entire Site at one time. Table 14-5 page 14-21 start in tandem • Planning Statement [APP-190] paragraph 4.2.2 - start in tandem. Please clarify what whether the construction phase for both the solar PV site and the grid connection corridor would be carried out in tandem or sequentially.
1.2.8	Environment Agency	The ExA notes the EA's comments in its RR [RR-003] in relation to the applicant's Consent and Agreements Position Statement. In response [REP1-031], the applicant states that it considers the combination of the draft DCO powers and the consents listed in the CAPS [APP-017] are comprehensive. Please identify any consents or agreements you consider have been omitted.
1.2.9	Moss and Fenwick Village Hall	The ExA notes the various comments set out in your written representation (WR) [REP1-064] Please provide: (a) evidence that the proposal would result in the loss of approximately 325 hectares of productive agricultural land (Grade 2 and 3a) and please explain how this figure has been calculated. Please provide the local impact report that confirms this land contributes significantly to regional food production or signpost where it can be found in the examination documents. (b) a copy of the Fenwick Local Plan and explain its status. (c) evidence of comments made by the local highway authority where they have expressed significant concerns about the suitability of the proposed access route.

Ref:	Question to:	Question:
		(d) evidence of comments made by the local authority engineers expressing significant concerns about altered drainage patterns impacting neighbouring properties. (e) evidence of Historic England's comments that there would be 'substantial harm' to the setting of historic assets. (f) further details as to the use of the village hall either in the form of a timetable of activities or a list of groups/ activities and their timings/ frequencies including any which are regular occurrences (weekly/ fortnightly/ monthly) and those which may be ad hoc. (g) evidence of economic decline to rural businesses from similar solar development proposals. (h) evidence that local network operators have identified significant constraints in the existing grid infrastructure. (i) evidence of opposition from statutory consultees and local authorities to the project.
3.	**The need case, electricity generated and climate change**	
1.3.1	Applicant	National Policy Statement (NPS) EN-3 indicates that, along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output, although acknowledging that this will vary significantly depending on the site. Please explain how, at around 5.2 acres per MW of output, the proposed development represents an efficient use of land in this context.
1.3.2	Applicant	Section 6.6 of the statement of need sets out the rationale for overplanting, and that the proposed development's indicative design (see [APP-074]) illustrates that a commercially rational overplanting ratio can be delivered. Please provide further details on the anticipated amounts of overplanting including the expected overplanting ratio and the amount of additional energy generation it would result in.
1.3.3	Applicant	The Grid Connection Statement [APP-194] indicates that a grid connection agreement for 237.5MW has been entered into with National Grid. Please confirm the current connection date and signpost where this information can be found in the application documents.

Ref:	Question to:	Question:
4.	**Other projects and cumulative effects**	
1.4.1	City of Doncaster Council	Does the Council agree with the identified cumulative developments assessed within each aspect chapter? If not, can it identify which cumulative developments have been omitted from which assessments and explain why it consider they should be included.
1.4.2	Applicant	The City of Doncaster Council's (CDC) Local Impact Report [REP1-043] refers to two solar farm DCO projects (Tween Bridge Solar DCO and Whitestone Solar Farm DCO); and the WR from Mr and Mrs Connolly [REP1-065] refer to a further five solar projects (Soay Solar Farm and Thorton Green, Kingfisher Solar, Driffield Solar, Mylers Leah Solar and Peartree Hill Solar Farm DCO). Please comment on whether this new information affects the applicant's assessment of cumulative effects.
5.	**Landscape and visual, glint and glare, good design**	
1.5.1	Applicant	Please explain, with reference to the Planning Inspectorate's advice on good design, how you have considered opportunities to demonstrate good design in terms of siting of the various elements of the proposed development in order to mitigate their effects on the landscape. Please explain how you propose to ensure that both the panels and associated development will contribute to the quality of the area.
1.5.2	Applicant	ES Chapter 10: Landscape and Visual Amenity [APP-062], paragraph 10.5.3 states that professional judgement has been used to assess residents' views, aided by aerial photography and field work from the surrounding area. How confident is the applicant that this has sufficiently captured the likely significant effects of the proposal on views from residential properties within the order limits. Please provide an explanation.
1.5.3	Applicant	ES Chapter 10: Landscape and Visual Amenity [APP-062], paragraph 10.4.26 explains that a range of representative viewpoints (VPs) have been provided for photomontages to demonstrate a variety of views and receptors. Do these cover all VPs where significant effects are identified?
1.5.4	City of Doncaster Council	Does the Council consider that sufficient design content is secured to ensure its future consenting will meet the landscape, visual and good design objectives of the NPS?
1.5.5	Applicant	ES Chapter 10: Landscape and Visual Amenity [APP-062], paragraph 10.4.33(f) explains that the working area for installation of the Grid Connection Cables is anticipated to be 30m. Both this paragraph and the ODPS [APP-193] also include wording which suggests that it could be greater than 30m. Please explain

Ref:	Question to:	Question:
		whether the 30m working area represents a maximum parameter and if so, please amend the ODPS accordingly. If not, please explain how the assessment has captured how the worst-case scenario?
1.5.6	Applicant	Please provide an assessment of the site as a landscape receptor as referred to in 12.4 of the draft statement of common ground (SoCG) [REP1-032] with CDC.
1.5.7	Applicant/City of Doncaster Council	The ExA notes that an updated representative viewpoint plan is currently being agreed [REP1-032]. The parties are asked to work together to agree a plan for submission at deadline 2.
1.5.8	City of Doncaster Council	Please identify any outstanding concerns in relation to the methodology, scope or process of the applicant's assessment of landscape and visual amenity.
1.5.9	Applicant	Please provide the technical note describing how the proposed development has responded to the landscape strategy for the relevant LCAs (as referred to in the draft SoCG with CDC (ref 12.2) [REP1-032].
Glint and Glare		
1.5.10	Applicant	ES Appendix 14-2: Glint and Glare Assessment [APP-181]. Please provide further details with regards to the type of aircraft that use Church Farm Airfield and the frequency which aircraft arrive/ depart.
1.5.11	Applicant	Please provide any supporting evidence for the magnitude of impact criteria used in paragraph 4.27 of ES Appendix 14-2: Glint and Glare Assessment [APP-181].
1.5.12	Applicant	The following paragraphs within ES Appendix 14-2: Glint and Glare Assessment [APP-181] state that the photograph taken is representative enough to confirm there is vegetation sufficient to screen views of the solar site. The ExA question whether these photographs are representative and request the following paragraphs and photographs are reviewed: a) Paragraph 6.23 states that the photograph taken for Receptor 28 is representative enough to confirm there is vegetation sufficient to screen all views of the solar site to the west and intervening buildings are sufficient to screen from the east. Given the positioning of the red dot, and the photograph provided, do you consider that a more representative view could be provided closer to the receptor and what they might experience.

Ref:	Question to:	Question:
		b) Paragraph 6.35 states that the photograph taken for Receptors 65 and 66 is representative enough to confirm there is sufficient vegetation to screen the solar PV site from receptors to the west. Do you consider this photograph to be representative of the view to the north west when it is taken looking southwards? c) Paragraph 6.37 says the first photograph is representative of views to the west for Receptors 67-69. Do you consider this photograph and the direction it is taken is representative of showing views to the west to demonstrate no impact when there is a potential of glint and glare impact on these residential properties? d) Paragraph 6.77. Please confirm whether this relates to the driver receptors that are listed in Table 6-2 and the images given in Annex N for driver receptors or to residential receptors. e) Paragraph 6.116 does not appear to correlate to the subject it should be discussing.
6.	**Biodiversity (including HRA and Biodiversity Net Gain)**	
1.6.1	Natural England	Please comment on where in the designation process the candidate SSSI is (as referred to in the Burnet Heritage Trust relevant representation [RR-011]). Please confirm what status a candidate SSSI holds and how much weight should be attributed to this designation.
1.6.2	Burnet Heritage Trust and Yorkshire Wildlife Trust	Please provide a plan showing the exact location of the candidate SSSI as referred to within your relevant representation [RR-011] and [RR-019].
1.6.3	Applicant	ES Chapter 8: Ecology paragraph 8.7.5 and Table 8-5 [APP-060]. Please confirm why if candidate Local Wildlife Sites are referred to in Chapter 8: Ecology, the candidate SSSI has not been discussed or assessed within that chapter or the fLEMP [REP1-029].

Ref:	Question to:	Question:
1.6.4	Applicant	fCEMP Table 3-6 [REP1-019] says that storage of materials and any washing, mixing or refuelling must take place in agreed allocated areas at least 5m from the edge of the root protection area of retained trees. However, point (j) on page 31 states that there would be an undeveloped buffer of at least 15m from individual trees. Please explain the differences between these distances for tree protection. Please explain how the undeveloped buffers would be demarcated.
1.6.5	Applicant	ES Appendix 8-5: Hedgerow Report [APP-150]. The ExA notes that ES Chapter 8: Ecology [APP-060] states that 3.99km of hedgerow are proposed to be lost. Please: a) signpost where in the ES the information showing the extent of each hedgerow to be removed can be found (and the reason why that hedgerow is to be removed). b) provide details as to what avoidance measures were sought before identifying its removal and what mitigation measures have been provided and how this is secured as a maximum parameter. c) outline what compensation has been provided.
1.6.6	Natural England, City of Doncaster, Yorkshire Wildlife Trust	**Protected Species**. Please comment on: a) the reptile survey methodology (ES Appendix 8-2: Reptiles Report [APP-146]). In particular, that only 2.32 hectares of the suitable habitat were surveyed, that no areas within the grid connection corridor were surveyed and the limitations and outcomes described in paragraphs 3.5.2 – 3.5.8 in the Reptiles Report. b) the Aquatic Ecology Report (ES Appendix 8-6: Aquatic Ecology Report [APP-151]) not providing mitigation measures during the operational phase and whether such mitigation measures should be provided. c) ES Appendices 8-7: Breeding Bird Report [APP-152 and APP-153] and 8-8: Non-breeding Bird Report [APP-154]. In particular, please comment: i. on the breeding bird and non-breeding bird survey methodology with regards to the baseline for breeding birds and the extent of the survey in particular on Marsh Harrier, Grasshopper Warbler, Marsh Warbler and Garganey. ii. there being no territory mapping surveys for the grid connection corridor within ES Appendix 8-7. iii. the extent of the limitations referred to in Section 3.5 of ES Appendix 8-7.

Ref:	Question to:	Question:
1.6.7	Applicant	Trees and Woodland. Please: a) confirm the number of trees/ tree features which would be subject to an incursion into their Root Protection Area. Paragraph 4.2.7 of the fLEMP [REP1-029] states this is 19 whereas page 33 of the fCEMP [REP1-019] says it would be 17. b) explain how the proposed management and monitoring of Ash and Elm trees as recommended in paragraphs 3.2.10 and 3.2.13 of the Arboricultural Impact Assessment [APP-167] would be secured. c) explain why planted trees and scrapes are not included within the post construction monitoring programme in section 6 of the fLEMP [REP1-029].
1.6.8	Applicant	The Burnet Heritage Trust have commented [RR-011] there are a number of species that have not been surveyed or included within ES Appendices 8-7 [APP-152 and APP-153] and 8-8 [APP-154] as follows: • Table 4 of ES Appendix 8-7 states that Marsh Harrier is not within the order limits. As Marsh Harrier is identified within Annex 1 Birds of Conservation Concern (BoCC) Amber list, please confirm survey distance for this species given the methodology set out within Section 3 of ES Appendix 8-7 and given the ecological protection afforded this species. • Grasshopper Warbler have not been surveyed. Given this species is a Species of Principal Importance (SPI) and is listed on the BoCC Red list, please confirm the extent of the surveying distance for this species given the methodology set out within Section 3 of ES Appendix 8-7. • Marsh Warbler have not been surveyed. Please confirm if this species was surveyed and if not, why not. • Garganey have not been surveyed. Please confirm if this was surveyed and if not, why not.
1.6.9	Applicant	The Burnet Heritage Trust relevant representation [RR-011] raises concerns that inclusion of fields SE6 and SE7 would result in a disproportionally negative effect on biodiversity including the isolation of broadleaf woodland from adjoining woodland areas. Please explain the rationale for inclusion of fields SE6 and SE7 and in particular: a) how it represents good design? b) the ecological impacts that result from the inclusion of these fields.

Ref:	Question to:	Question:
		Please also explain how the removal of these fields would impact on the significant effects identified in the ES Chapter 8: Ecology [APP-060] (including residual significant effects) and how their removal would affect the likely generation capacity of the project.
1.6.10	Applicant	On 7 April 2025, Natural England published new 'standing advice' for beavers. It also updated many of its suite of standing advice for protected species namely: Great Crested Newts, bats, reptiles, fish, freshwater pearl mussels, wild birds, otters, protected wild plants, fungi and lichens, invertebrates, badgers and natterjack toads. The standing advice is a material planning consideration. Please comment as to whether these changes affect any of the conclusions of assessments carried out as part of the ES.
1.6.11	Applicant	Hedgerow Report [APP-150] Figure 8-5-1. Hedgerow H83 and H96 run alongside footpath Fenwick 16 (Haggs Lane). Haggs Lane is identified as the inbound access route for construction workers. Please signpost where within this report or the ES protection measures are proposed for these hedgerows during the construction phase given the need to accommodate both traffic and rights of way users along Fenwick 16.
1.6.12	Applicant	Aquatic Report [APP-151] paragraph 3.1.28 states that Nuttall's waterweed is no longer listed in Schedule 9 of the Natural Environment and Rural Communities Act 2006 but is listed in the Invasive Alien Species (Enforcement and Permitting) Order 2019. The fCEMP [REP1-019] Table 3-3 refers to a Biosecurity Plan being produced prior to construction and pre-construction surveys being undertaken. Please confirm a) Whether these Biosecurity Plan and pre-construction surveys would include invasive species listed in the Invasive Alien Species (Enforcement and Permitting) Order 2019. This question also relates to curly waterweed (paragraph 3.1.29) and New Zealand mud snail (paragraph 3.1.30). b) that the Biosecurity Plan would provide adequate details of long-term monitoring i.e. frequency and season of monitoring visits and the duration before eradication can be confirmed.
1.6.13	Applicant	ES Chapter 7: Heritage [REP1-011] paragraph 7.4.2. This paragraph states that if the grid connection line drop was utilised, this would comprise below ground cables from the substation to a new cable compound at base of overhead line tower in field SE2. Please provide details on what mitigation and protection measures, over and above those detailed in the fCEMP [REP1-019] page 29 "Clearance or damage …. associated species", would be provided for the protection of Bunfold Shaw ancient woodland from the installation of the below ground cables. What protection measures would be in place for Bunfold Shaw from activities that would take place within the new cable compound at the base of the overhead line tower.

Ref:	Question to:	Question:
1.6.14	Applicant	fLEMP paragraph 4.2.3 [REP1-029]. This paragraph says that updated surveys would be carried out pre-construction. Please explain what actions would take place following the completion of the surveys (including who they would be provided to and what other documents may then require updating before submission of final documents).
1.6.15	Applicant	fLEMP paragraph 5.2.14 [REP1-029]. Where setbacks of 10m from watercourses cannot be provided for open cut trenching, what precautionary measures would be provided (page 37 of the fCEMP [REP1-019]) to safeguard habitats in those locations.
1.6.16	Applicant	fLEMP paragraph 5.3.2 [REP1-029]. Please explain what measures would be explored at the locations detailed in bullet points a - c within paragraph 5.3.2 as these measures are not clearly shown on Figure 2-3 Indicative Site Layout Plan [APP-74] or in Appendix A of the fLEMP.
1.6.17	Applicant	ES Chapter 8: Ecology Table 8-12: Determination of Potential Impacts and Effects on Important Ecological Features – Habitats and Species (page 8-129 Open Mosaic Habitat (OMH) on Previously Developed Land (PDL) Priority Habitat) [APP-060] and fLEMP paragraphs 7.3.18 – 7.3.23 [REP1-029]. These documents say there is an area of PDL which has been assessed as OMH which is a Habitat of Principal Importance where much of the value is within the topsoil but that the site was not accessible for surveying. The documents go on to say it would be temporarily disturbed to facilitate the installation of cables and that the substrate that is removed would be retained during the works period and infilled once the Grid Connection Cables are in place. The documents say that the infilling of the cable trench would disturb the seed bank and create new opportunities. The paragraphs say that precautions must be taken during the works period not to flush the habitat away with any nutrient rich runoff from nearby habitats. Please explain what precautionary measures would be adopted and please direct us to where these details are contained within the fCEMP [REP1-019] and Commitment and Mitigation Register [APP-189]. If it is recognised that there would be disturbance of the seed bank how is this reflected within the BNG metric?
1.6.18	Natural England, City of Doncaster Council, Yorkshire Wildlife Trust	ES Chapter 8: Ecology Table 8-10 (page 8-93 OMH on PDL Priority Habitat) [APP-060] and fLEMP paragraphs 7.3.18 – 7.3.25 [REP1-029]. Given OMH is a Priority Habitat and substrate is to be removed during the installation of the grid connection corridor, do you have any concerns with the methodology set out within paragraphs 7.3.18 - 7.3.25 for its reinstatement and mitigation proposed.

Ref:	Question to:	Question:
1.6.19	City of Doncaster Council	Please comment on the range of proposed habitats across the solar PV site as shown on the Indicative Landscape Masterplan in Appendix A of the fLEMP [REP1-029] and the suitability of broadleaved woodland along the River Went corridor.
No Significant Effects Report		
1.6.20	Applicant	The ExA notes that Thorne Moor Special Area of Conservation (SAC), Thorne and Hatfield Moors Special Protection Area (SPA) and Hatfield Moor SAC have been scoped in for the assessment of construction and decommissioning effects within the No Significant Effects Report (NSER) [REP1-025], however, these designated sites are not included in the list of relevant habitat sites in Table 6. Please update Table 6 to reflect all relevant habitat sites included in the assessment.
1.6.21	Applicant	Footnote 7 of the NSER [REP1-025] refers to Skipwith Common SAC. The ExA notes that Skipwith Common SAC was not identified in paragraph 4.2.6 as being within 20km of the proposed development and has not been illustrated in Figure 2 or assessed in the NSER. Please clarify the status of the Skipwith Common SAC in relation to the proposed development. For example, if Skipwith Common SAC is located within 20km of the application site, clear reasoning should be provided to explain why it has been scoped out of further assessment. However, if its inclusion in the NSER is an error, then the applicant should submit a revised version of the NSER which doesn't make reference to the Skipwith Common SAC.
Biodiversity Net Gain		
1.6.22	Applicant	Biodiversity Net Gain (BNG) Assessment [REP1-023]. The BNG assessment does not provide the data files that underpin it. Please provide a copy of the data files that support this document.
1.6.23	Natural England, City of Doncaster	The applicant has stated [REP1-031] that it is adopting a deviation to the approach taken for other types of development, including under the TCPA 1990, for the biodiversity baseline by not including all land within the development's order limits in relation to the grid connection corridor. Please comment on this approach.
1.6.24	Applicant	Natural England in its response to deadline 1 [REP1-052] have commented that the biodiversity baseline includes all land within the order limits to present a 'worst-case scenario' approach. The applicant states [REP-031] that a deviation from the TCPA 1990 methodology is being applied in relation to the grid connection corridor to allow for flexibility in the design route. Please confirm if all the order limits for the solar

Ref:	Question to:	Question:
		PV site have been used as part of the baseline within the BNG metric and approach. Please confirm how habitat below the solar panels are being recorded for BNG.
1.6.25	Applicant	The applicant's Response to Relevant Representations [REP1-031] confirms that the surveyors conducting the River Condition Assessment (RCA) were appropriately trained and accredited. Natural England have commented at deadline 1 that it is not clear within the BNG Assessment whether this has been followed. Please review the BNG Assessment [REP1-023] and update accordingly.
1.6.26	Natural England	The applicant's Response to Relevant Representations [REP1-031] (page 92) notes that whilst there is a failure to meet the trading rules for OMH, it is not considered significant due to the potential that temporary disturbance could be beneficial. Please comment on this approach.
1.6.27	Applicant	Natural England response at deadline 1 [REP1-052] recommends that should the DCO be granted, appropriate surveys for OMH are undertaken to determine whether the habitat is in fact OMH as this may alter the results of the adherence to the trading rules. Please signpost where in the fCEMP [REP1-019] or fLEMP [REP1-029] further details of pre-construction surveys for OMH can be found.
1.6.28	Natural England, City of Doncaster Council	Page 15 of the applicant's Response to Relevant Representations [REP1-031]. Please comment on the applicant's response that they challenge the UKHab guidance with regards to the categorisation of all of the Solar PV panel footprint being categorised as 'Grassland – modified grassland' rather than the strips of open habitat between the panels being recorded separately.
7.	**The water environment**	
1.7.1	The Environment Agency and the Lead Local Flood Authority	Paragraph 2.1.2 of ES Appendix 9-3: Flood Risk Assessment [APP-158 & APP-159] notes that the order limits include a section of highway at the junction of the A19 and Station Road but explains that as no development is planned along this route, it has not been considered as part of the FRA. It is, however, noted that for some of the modelling, the relevant extent of the modelling includes this area. Please confirm whether your organisation is content with this approach to modelling.
1.7.2	Applicant	The ExA notes that not all of the modelled scenarios are represented on a figure. For example, paragraph 5.2.6 refers to the modelling for the River Went undertaking scenarios of 50% Annual Exceedance Probability (AEP), 3.33% AEP, 1% AEP, 1% AEP plus 38% climate change and 1% credible maximum, however these do not all have a figure provided. The 1% AEP plus 38% climate change modelled scenario

Ref:	Question to:	Question:
		for the River Went is illustrated in Figure 9-3-1. Please provide figures for all modelled scenarios and update the FRA accordingly.
1.7.3	Danvm Drainage Commissioners	The ExA notes that no specific agreement on the approach to SuDS/drainage strategy is provided. However, the Framework Drainage Strategy [APP-160] notes (at paragraph 1.3.3) that the Danvm Drainage Commissioners will be contacted during detailed design to agree impacts from the proposed works. Please confirm whether your organisation is content with the applicant's approach.
1.7.4	The Environment Agency	The ExA notes that Annex A of ES Appendix 9-3: Flood Risk Assessment [APP-158 & APP-159] includes various assumptions and limitations (see Section 9). It indicates that the "with scheme" scenario has not been modelled for either the fluvial or breach models used because the presence of the panels and associated infrastructure in the Solar PV Site (as the grid connection corridor is below ground and would therefore not pose an increase to flood risk) does not impact floodplain storage or flood water movement. Details on this are provided in paragraph 7.2.1 of the FRA. Please confirm that the EA is content with the approach adopted by the applicant.
1.7.5	Applicant	In relation to the residual fluvial/ tidal risk associated with flood defences, paragraph 5.4.1 of ES Appendix 9-3: Flood Risk Assessment [APP-158 & APP-159] acknowledges the residual risk of flooding to the solar PVC site is there was overtopping leading to a breach of the flood defences. However, the majority of the assessment and modelling appears to refer to a breach only, and as such it is not clear how overtopping has also been considered. Please explain how the risk of overtopping has been considered in the assessment.
1.7.6	Applicant	Table 5-2 in the ES Appendix 9-3: Flood Risk Assessment [APP-158 & APP-159] proposes that solar PV panels will be at least 300mm above the design flood level and where located in the credible maximum scenario flood extent, solar PV panels will be raised 400mm above the flood level. Field stations are also proposed to be raised 300mm above credible maximum scenario flood extent. However, the method that would be employed to raise panels and field stations to the appropriate height is not set out in the FRA. Please can the FRA be updated to include this information or signpost where this information can be found in the relevant application documents.
1.7.7	Applicant	ES Chapter 9: Water Environment and ES Appendix 9-3: Flood Risk Assessment [APP-158 & APP-159] proposes that solar PV panels will be raised to ensure a 300m freeboard above the design flood level and where located in the credible maximum scenario flood extent, solar PV panels will be raised 400mm above the flood level associated with this extent. However, as noted by Environment Agency in its RR [RR-003], solar PV panels which fall within the design flood extent will also fall within the credible maximum flood extent and therefore the freeboard for all solar PV panels should be in line with the credible maximum

Ref:	Question to:	Question:
		scenario flood extent. Please review the relevant application documents and provide clarity regarding the proposed freeboard for the design flood and credible maximum scenarios.
1.7.8	Applicant	Paragraph 8.3.4 of ES Appendix 9-3: Flood Risk Assessment [APP-158 & APP-159] states that the on-site substation and BESS will be bunded to provide protection during the unlikely event of a breach of the flood defences. Please can the FRA be updated to include details of the proposed bunding or signpost where this information has been provided in the relevant application documents.
1.7.9	Applicant	Paragraph 7.3.2 of ES Appendix 9-3: FRA [APP-158 & APP-159] states that the grid connection corridor intersects existing flood defences along the Thorpe Marsh drain, and therefore the proposed development will require crossings of these defences. The ExA notes that the FRA assesses a breach scenario in respect of these defences. However, please explain the applicant's intention for these crossings including the proposed methodology and the assessment of any impacts of direct damage, vibration or other disturbances that may affect the integrity of these defences.
1.7.10	Applicant/Environment Agency	The ExA notes that the methodology of the hydraulic modelling undertaken as part of the FRA [APP-158 & APP-159] was agreed with the Environment Agency. We further note that the hydraulic modelling report (Annex A of the FRA) and model data was sent to the Environment Agency for review and approval but their comments and approval were still pending at the time of submission. Please provide an update.
1.7.11	Applicant	Please provide details of sources of water supply and permitting requirements for all proposed activities using water or signpost where they can be found in the ES. This includes vehicle washing & other cleaning water/ concrete wash water etc.
1.7.12	Applicant/Environment Agency	The EA published new flood and coastal erosion risk data on 25 March 2025. Are there any implications for the relevant assessments for the proposed development, as a result of these updated data sets?
8.	**Soils and agriculture**	
1.8.1	Applicant	ES Chapter 12: Socio-Economics and Land Use (paragraph 12.7.52) [APP-064]. The ExA notes that some 0.78ha of Best and Most Versatile (BMV) land would be permanently lost to structural planting. Please signpost where within the documents it states what other uses would be taking place on BMV land based on the extent shown in Map 2 in the Agricultural Land Classification (ALC) report [APP-175].
1.8.2	Applicant	The ExA notes that fields SW11 and SW12 consist of BMV land (Grades 2 and 3a). A number of application documents (including paragraph 6.9.8 of the planning statement [APP-190]) state that BMV land identified

Ref:	Question to:	Question:
		on the ALC mapping was avoided where possible. Furthermore, the ExA notes that a number of significant effects associated with the use of these fields are identified in ES Chapter 10: Landscape and Visual Amenity [APP-062] in relation to nearby residential receptors, including Jet Hall Farm. Please explain: 1. the applicant's rationale for including these fields in the Proposed Development, including how it represents good design; 2. how the use of these fields, consisting of BMV, represents an efficient use of land; and 3. the implications for the generating capacity for the proposal should these two fields be removed from the order limits.
1.8.3	Applicant	As there would bea loss of agricultural land, including BMV, over the intended lifespan of the proposed development, and that PDL land would not be utilised for the energy generation, please explain whether you consider the proposal would constitute an efficient use of land?
1.8.4	City of Doncaster Council	Please comment on: a) the methodology and findings used for the assessment of soils and BMV land and the use of the Ministry of Agricultural, Farming and Fisheries guidance as set out within the ALC Report [APP-175]. b) The Framework Soil Management Plan (fSMP) [APP-199] including the control mechanisms for safeguarding soils along the grid connection corridor.
1.8.5	Environment Agency	The EA's RR [RR-003] notes that the fSMP [APP-199] does not include figures or supporting information and the final detailed SMP would require more information for it to serve as a functional product. Please provide clarification on what further detail the EA wishes to see within the fSMP.
1.8.6	Applicant	fSMP paragraph 2.1.2 [APP-199]. The fSMP says the detailed SMP would provide information on expected after use for each soil "*for example whether topsoil to be used on site, used or sold off site*". a) if top and subsoil is only to be stripped from the cable route corridor to allow the placement of the cables, please provide clarification as to why topsoil would be sold off site and not placed back to its original location.

Ref:	Question to:	Question:
		b) please give an example of why and how subsoils stripped would be used as structural fill or topsoil manufacture and not placed back to their original position. c) please explain the intent and reason for the sentence "*for example whether topsoil to be used on site, used or sold off site*" when paragraph 2.1.3 says that "*it is expected all soils will be retained on site and reinstated in their area of origin*".
1.8.7	Applicant	ES Chapter 12: Socio-Economics and Land Use [APP-064] and the fSMP [APP-199]. Please: a) signpost where within these documents it clearly sets out where soils would be stripped and why. b) confirm whether the mapping referred to in paragraph 2.1.2 of the fSMP would indicate the areas where topsoil and subsoil were stripped from, and where they should be returned to, so that the correct soils can be returned to their original location. If so, please update paragraph 2.1.2 of the fSMP to make this explicit. If not, please explain. c) confirm where construction compound soils would be stockpiled within the order limits for the duration of the construction compounds.
1.8.8	Applicant	fSMP [APP-199]. As stockpiled soils could remain in place for soje time, please provide details as to how those soils would be safeguarded whilst they are stockpiled, from erosion or damage.
1.8.9	Applicant	ES Chapter 12: Socio-Economics and Land Use [APP-064] paragraph 12.7.49 sets out that the land will be planted up as grassland or native scrub. Please provide further details of how this would be managed, including through the DCO, and explain why such an approach is being taken.
1.8.10	Applicant	ES Appendix 12-3: Agricultural Land Classification Report [APP-175]. Please explain the reasoning behind the locations chosen for the trial pits as shown on Map 1 Observations.
1.8.11	Applicant	ES Appendix 12-3: Agricultural Land Classification Report [APP-175]. Field SW10 is to have both the construction compound and the BESS. It is noted that where these elements are proposed, the ALC has some BMV Grade 2 and 3a land within it. Please confirm: a) what safeguards will be in place for the construction compound to protection those soils from degradation during the construction and decommissioning phases? b) what measures would be put in place during the operational phase to protect the BMV agricultural land? c) please signpost where within the fSMP [APP-199] these safeguards are in place.

Ref:	Question to:	Question:
		d) what safeguards would be in place to protect the soils beneath the BESS and please confirm the volume of Grade 3a land that would be affected by the BESS. Please provide a plan that overlays the BMV Grades 1 - 3a with the Indicative Site Layout Figure 2-3 to demonstrate the positioning of permanent infrastructure and BMV agricultural land.
1.8.12	Applicant	fSMP paragraph 4.1.2 [APP-199]. Please provide clarification on the following: a) what is meant by 'outside designated areas' for point 4.1.2(a). b) where donor areas and receptor areas are likely to be within the order limits and why this would occur. c) should there be a general principle that plant/ machinery should be stored during the daytime/ overnight in the construction compounds to ensure they are not left somewhere else and cause compaction and leakage of oils etc. d) paragraph 4.1.2 (j) says daily records are maintained. Would these daily records be provided to CDC or management? e) should there be provision for protective matting being in place for the construction compounds over the soils to protect soil integrity during construction period?
1.8.13	Applicant	fSMP paragraph 4.2.2 [APP-199] states that where the soil profile has already been disturbed, the works should be completed to the base level in that location. What does the base level in this context mean?
1.8.14	Applicant	fSMP paragraph 4.7.1 [APP-199]. Please confirm what are the temporary and permanent buildings in addition to those within the construction compounds, the BESS and the operations and maintenance hub.
1.8.15	Applicant	Please signpost where in the documentation information on the monitoring and management regime for BMV land can be found. In particular, please identify any structures both during the construction phase (i.e. the construction compounds) and then the operational phase (i.e. the BESS and solar panels) which the applicant considers should be monitored to ensure the BMV standard remains. Please also provide details and the frequency of that monitoring, what that monitoring would entail and what remediation measures would be carried out either before the operational phase commences or during the operational phase i.e. not just the restoration phase which is taken to mean at the end of the decommissioning phase.
9.	**The historic environment**	

Ref:	Question to:	Question:
1.9.1	Applicant	The Framework Archaeological Mitigation Strategy (FAMS) [REP1-044] and ES Chapter 7: Cultural Heritage [REP1-011]. There appears to be an inconsistency between these two documents as to which fields were not able to be trenched during the first phase of work due to ecological constraints. The FAMS says it is fields NE3, NE8 and NE10 whereas paragraph 7.4.14 of Chapter 7: Cultural Heritage says it is fields NW3, NW8 and NW10. Please confirm which fields were not surveyed and confirm when these fields would be surveyed and how this would be secured.
1.9.2	Applicant	Planning Statement [APP-246] paragraph 4.2.22 states the compounds would be approximately 150m x 150m. However, the construction compound shown in Field NW7 on the Works Plan – Rev 1 [APP-214] and ES Figure 2-3 [APP-074] show a much larger area. Please confirm the size of the indicative construction compound in Field NW7 and explain given the construction compounds proximity to heritage assets, why the compound is required to be of that size.
1.9.3	Applicant	The FAMS [REP1-044] paragraph 4.1.1. It appears the reference to Table 1 in paragraph 4.1.1 is incorrect as Table 1 is listed as Relevant Regional Research Agenda Strategic Objectives. Please confirm if Table 1 is the correct reference.
1.9.4	Applicant	The FAMS [REP1-044] Table 2: Schedule of Preliminary Archaeological Mitigation Sites identifies Fields NW8 and NW10 as preservation in-situ (avoidance). Please explain how this proposed mitigation measure would be achieved when these fields are identified as having solar panels on them.
1.9.5	Applicant	Environmental Commitments and Mitigation Register [APP-189] #CH-01, #CH08, #CH-10 and #CH-11. Please explain why the FAMS [REP1-044] is not listed as a Commitment Securing Mechanism for these IDs.
1.9.6	Applicant	Environmental Commitments and Mitigation Register [APP-189]. Please signpost the documentation which: a) details which hedgerows and boundaries in particular would be replanted/ enhanced (ID #CH-05) b) details which hedgerows in proximity to designated heritage assets would be enhanced to screen and reduce potential impacts (ID #CH-07).
1.9.7	Applicant	Please explain the approach taken to identify the chosen locations for the temporary compounds with specific regard to minimisation of harm to heritage assets.

Ref:	Question to:	Question:
1.9.8	Applicant	ES Chapter 7: Cultural Heritage [REP1-011]. If the Grid Connection Line Drop is utilised, this would comprise below ground cables from the substation to the drop point. Please confirm whether the below ground cables would impact upon any archaeological finds. Please signpost where mitigation measures are provided for any potential harm to archaeological finds along this proposed route. Please confirm how the below ground cable would be installed to safeguard archaeological heritage assets.
10.	**Transport and access, highways and public rights of way**	
1.10.1	Applicant	Framework Operational Environmental Management Plan (fOEMP) [APP-197] section 2.5. A limited number of Heavy Goods Vehicles (HGVs) are expected during the operational phase associated with the replacement of batteries, inverters and transformers. Please confirm the access for HGVs into the solar PV site for those accessing the Field Stations for maintenance reasons as this does not appear to be covered in paragraph 2.5.5.
1.10.2	Applicant	The Framework Construction Traffic Management Plan (fCTMP) [APP-251 & APP-252] at paragraph 4.1.3 states that access arrangements to the grid connection corridor would be 100% via Trumfleet Lane (Access Point 3), Marsh Road (Access Points 7 and 8) and Thorpe Bank (Access Points 9 and 10). However, Section 7.3, Table 9: HGV Routing and Section 10.6 of ES Appendix 13-4: Transport Assessment [APP-179] and Section 4.3 of the fCTMP [APP-251 & APP-252] say that HGV movements would be restricted to certain routes: Moss Road to the strategic road network and the A19. This would imply that no HGVs would be travelling along Trumfleet Lane, Marsh Road, Brick Kiln Lane or Thorpe Bank. The response to [RR-026] within the applicant's Response to Relevant Representations [REP1-031] states for construction HGV movements for the grid connection corridor, a haul road would be constructed between Access 2 on Moss Road and Access 3 on Trumfleet Lane and that ES Appendix 13-4: Transport Assessment [APP-179] assumes up to 6 two-way HGV movements would utilise this haul road between Access 2 and 3. Please: a) explain what the expected proportion of HGVs accessing the order limits daily (i.e. of the 18 individual HGVs) would be accessing the grid connection corridor. b) explain what the expected proportion of HGVs accessing the grid connection corridor would be accessing/ egressing each individual access point along the corridor (Access Point 2 – 11).

Ref:	Question to:	Question:
		Explain how HGVs would access the different parts of the grid connection corridor (Access Points 3, 5, 7, 8, 9 and 10) including the former Thorpe Marsh Substation. c) explain whether construction workers would be accessing the grid connection corridor via Access Points 3, 5, 7, 8, 9 and 10 directly by their own vehicle or minibus or would travel from the main construction compound within the solar PV site by tractor and trailer. d) set out what the worst-case scenario would be for HGVs accessing/ egressing an access point along the grid connection corridor and signpost where within the ES documentation the assessment of harm is for this and what mitigation measures would be provided. e) signpost where within ES Appendix 13-4 there are details of the haul road between Access 2 and 3 and the 6 daily two way HGV movements. f) please confirm if any further traffic management measures would be required for Access Point 9 given the highway narrows immediately north of this access point.
1.10.3	City of Doncaster Council	Please comment on whether the Highway Authority are concerned with the proposed increase in HGV movements along the local highway network including Moss Road, Trumfleet Lane, Marsh Road, Brick Kiln Lane and Thorpe Bank including the access required for transportation of equipment for the horizontal directional drilling.
1.10.4	City of Doncaster Council	ES Appendix 13-4:Transport Assessment [APP-179] paragraphs 10.5.6 and 10.5.8. Please comment on: a) Paragraph 10.5.6 that Automatic Traffic Count (ATC) 9, 10, 11, 12, 13 and 14 has sufficient capacity on the road network to accommodate the addition trips generated by workers accessing the Solar PV site during the construction phase. b) Paragraph 105.8 that the development would extend the peak hour and the hour affected would generally be no worse than current peak hour and if there are concerns with extending peak hour.
1.10.5	Applicant	The fCTMP [APP-251 & APP-252] states that the West Lane access would be for emergency use only. Please clarify what emergency use would comprise and how such use would be limited/ restricted.

Ref:	Question to:	Question:
1.10.6	Applicant	Please explain why Table 2: Construction Traffic Assessment Data of ES Appendix 11-4: Construction and Operational and Maintenance Noise Modelling [APP-172] has a 2026 Baseline and uses annual average weekly traffic (AAWT) figures whereas Table 16: 2028 Baseline Traffic and Construction Traffic within ES Appendix 13-4: Transport Assessment [APP-179] uses a 2028 baseline and annual average daily traffic (AADT) figures.
1.10.7	Applicant	Construction and operational phase accesses: Please confirm the following: a) what surfacing internal access tracks (both at the solar PV site and the grid connection corridor) would be constructed of. b) whether a banksman be present at Access Point 1 Moss Road for the full 0900 – 1700 duration. c) Access 12 and 13 off of Lawn Lane Layout and Swept Path Analysis, fCTMP Part 2 of 2 [APP-252] Which vehicles and to what frequency vehicles would be using these access points.
1.10.8	Applicant	Table 16 of ES Appendix 13-4: Transport Assessment [APP-179] ATC 11 Fenwick Common Lane. Please confirm what the six development movements on Fenwick Common Lane during the PM Development Peak would be. If these are minibuses, please confirm that of the 92 Development movements during the AM Development Peak, six of those would be minibus movements.
1.10.9	Applicant	Figure 13-2 Traffic Survey Locations [APP-124]. Please explain: a) whether the Base Year 2028 figures are without construction worker traffic. b) why there is no HGV assignment for the hours HGVs are proposed to access the site. c) why for Worker Assignment PV 0600-0700 the figures given for each ATC link within Figure 13-2 differ to the numbers presented in Table 16 of ES Appendix 13-4: Transport Assessment [APP-179]. d) when the minibuses that travel to the site between 0600-0700 would leave via Access Point 1 or would they remain on site during the day.

Ref:	Question to:	Question:
		e) why, for the minibus assignment 0600-0700, eight minibuses travel at ATC 9 and ATC 10, however six travel to ATC 11. Please explain where the two other minibuses travel to. f) why there is no Base Year 2023 for 1900-2000 hours (this being the time when workers are proposed to leave the site), and why there are no base years for the hours when HGVs would be on the network associated with the development.
1.10.10	Applicant	Please confirm what the worst-case scenario would be for access and egress of the abnormal indivisible loads (AIL) and how this has been taken into account in the assessments within the ES and its appendices.
1.10.11	City of Doncaster Council	Table 4: Summary of PIC Data by Road of ES Appendix 13-4: Transport Assessment [APP-179]. Please confirm if the collisions on Moss Road are in one location or spread along the length of Moss Road.
1.10.12	City of Doncaster Council	Table 5: Summary of PIC Data by Junction of ES Appendix 13-4: Transport Assessment [APP-179]. Please comment on the PIC Data presented and confirm there is no PIC Data for the junctions of Moss Road/ Fenwick Common Lane; and Moss Road/ Trumfleet Lane.
1.10.13	Applicant	ES Appendix 13-4: Transport Assessment [APP-179]. Please clarify the difference in time shown in Table 6: Trip Generation by Time Period and Table 7: Daily Profile of Generated Trips and paragraph 6.4.4 for when workers are due to leave the site. Please confirm whether all workers would be transported back to the Solar PV site as a hub to then leave the site i.e. from the grid connection corridor?
1.10.14	City of Doncaster Council	The fCTMP [APP-251 & APP-252] paragraph 5.3.8 states that HGVs would be redirected via an alternative route if access to the Solar PV site is compromised due to an incident or road closure. Please comment on whether the fCTMP should include a notification process to CDC highway department for such circumstances.
1.10.15	City of Doncaster Council	Please comment on the proposed embedded mitigation measures for Public Rights of Way (PRoW) as set out in the ES Chapter 12: Socio-Economics and Land Use [REP1-013] and the Framework Public Rights of Way Management Plan (fPRoWMP) [REP1-027] in particular: a) for the diversion of Moss 6 and Fenwick 14 during the construction phase and their permanent diversion during the operational phase,

Ref:	Question to:	Question:
		b) for Fenwick 16 (Haggs Lane) to safeguard users of these PRoW during the construction and operational phases.
1.10.16	City of Doncaster Council	Please provide an update on the progress of the application to upgrade Sykehouse 29 and Fenwick 12 to bridleways, including its expected timescale for determination.
1.10.17	Applicant	Please: a) clarify whether the upgrading of Sykehouse 29 and Fenwick 12 to bridleways would alter the assessment of magnitude and harm detailed within the ES Chapter 12: Socio-Economics and Land Use [REP1-013] for these PRoW. b) explain what additional mitigation measures may be required to accommodate equestrians on these PRoWs. c) confirm what discussions and outcomes have taken place with the landowner of the land where the proposed upgrade of the PRoW is to take place. d) There is no mention of the bridleway upgrade in the fPRoWMP [REP1-027]. Please outline what specific measures may need to be amended/ accommodated in this document to ensure it is adequately covered. e) confirm the increase in distance for users of these PRoW and what is minimal level of harm as specified in the Planning Statement [APP-190].
1.10.18	Applicant	Please signpost where within the fPRoWMP [REP1-027] there are details on the specification of any gates that may be installed as part of the proposal.
1.10.19	Applicant	Please provide details of what protective fencing/ barriers would be in place along any access track that is running within 10m of a PRoW and how it would be secured. It is noted that a temporary barrier would go in along Haggs Lane, but no details are provided within the fPRoWMP [REP1-027] or for any fencing. Paragraph 12.7.29 of ES Chapter 12: Socio-Economics and Land Use [REP1-013] states that the hedge would be trimmed to allow a minimum legal width but such provision is not set out in the FPRoWMP.

Ref:	Question to:	Question:
1.10.20	City of Doncaster Council	Are CDC content with the applicant's definition of 'importance' in the context of PRoW within ES Chapter 12: Socio-Economics and Land Use [REP1-013]. Please explain why the usage of a rural PRoW is comparable to an urban PRoW when they are a different setting and may have different purposes and also different populations in the locality using them.
1.10.21	Applicant	Please signpost where the definition of 'high importance', 'medium importance', 'low importance' and 'very low importance' is within the ES Chapter 12: Socio-Economics and Land Use [REP1-013] and how these criteria of importance have been established.
1.10.22	Applicant	fPRoWMP [REP1-027] paragraph 2.1.4 states that Fenwick 3 interacts with the order limits at the site accesses for vehicles. Please explain how Fenwick 3 would interact with the order limits site access when it lies north of Access Point 4 and no vehicles associated with the proposal would be travelling north beyond this point. Please explain why Moss 7, Moss 9 and Moss 11 are not included in the list within this paragraph.
1.10.23	Applicant	Grid connection corridor. Please: a) provide a list of which PRoW are expected to be temporarily diverted or stopped up during the grid connection corridor works or signpost where within the documentation this information is contained. b) provide a list of those PRoW that would not be diverted or stopped up that cross the order limits and provide an explanation as to how those PRoW would be safeguarded. c) provide details for what specific embedded mitigation measures there would be for any PRoW that interface with the cable route corridor or signpost where this is detailed in the FPRoWMP. d) provide details of which PRoW will be impacted by short term trenching and how that would be mitigated and managed.
1.10.24	City of Doncaster Council	For PRoW along the grid connection corridor, please comment on the trigger points and mechanisms set out in the fPRoWMP [REP1-027] and how they safeguard users of these PRoW.
1.10.25	Applicant	ES Chapter 12: Socio-Economics and Land Use [REP1-013] states that Moss 6 and Fenwick 14 would be permanently diverted to follow the path of the construction access route. Please confirm what safeguard measures would be in place for users of these diverted routes when they are used by vehicles.

Ref:	Question to:	Question:
11.	**Noise, vibration, air quality, and nuisance**	
1.11.1	Applicant	Requirement 14 (Operational Noise). Please explain why ES Chapter 11: Noise and Vibration, Section 11.7 (specifically paragraphs 11.7.14 – 11.7.17 'Operation and Maintenance') [APP-063] and #NV-08 - #NV-11 in the Environmental Commitments and Mitigation Register [APP-189] do not refer to Requirement 14. Please explain why these parts of the ES do not commit that noise levels at sensitive receptors will be no higher than those levels presented in Table 11-7 within the ES Chapter 11 i.e. less than or equal to +5dB above typical background level for the Lowest Observed Adverse Effect Level (LOAEL).
1.11.2	City of Doncaster Council	Please comment on the methodology used within the ES Chapter 11 [APP-063] alongside the LOAEL and SOAEL thresholds used for all phases of the development proposed.
1.11.3	Applicant	ES Chapter 11: Noise and Vibration Table 11-2: Noise Sensitive Receptors [APP-063]. There appears to be a typo of *Bale Lane* instead of *Bate Lane*. Please explain why West End Farm on West Lane (R8) was chosen as a representative sensitive receptor instead of The Dovecote on West Lane.
1.11.4	Applicant	ES Chapter 11: Noise and Vibration paragraph 11.4.20 [APP-063]. Please confirm the non-unattended noise monitoring locations are ML1-ML9.
1.11.5	Applicant	ES Chapter 11: Noise and Vibration paragraph 4.2.1 [APP-063]. This paragraph states that cable laying would mainly be restricted to core daytime work hours so attended measurements were collected during the daytime only. This paragraph does not include potential 24 hour working for Horizontal Directional Drilling (HDD) operations that may need to take place. Please explain what 'mainly' means in the context given in this paragraph. Please explain what the anticipated noise levels and duration of working environment would be? Please confirm the duration of the short-term noise measurements collected.
1.11.6	City of Doncaster Council	ES Chapter 11: Noise and Vibration paragraph 4.2.1 [APP-063]. Please comment on this paragraph with regards to: a) potential for noise generating operations to occur outside of daytime working hours and that no unattended 24-hour noise monitoring was carried out with regards to potential noise impacts for HDD operations.

Ref:	Question to:	Question:
		b) the applicant's approach to the collection of the short-term noise measurements
1.11.7	Applicant	ES Chapter 11: Noise and Vibration paragraph 11.8.15 and 11.8.16 [APP-063]. These paragraphs state "*the LOAEL is not exceeded at any of the receptor locations so construction noise effects from NGA2 are not significant. However, the LOAEL is exceeded at some receptor locations and adverse levels of noise are identified*" and goes on to state "*although adverse levels of noise are identified at some receptors, NPSE requirements are met through provision of embedded mitigation*". Please explain how these paragraphs align with Table 11-11 which only identifies noise levels during daytime construction activity as below LOAEL.
1.11.8	City of Doncaster Council	ES Appendix 11-4: Construction and Operation and Maintenance Noise Modelling [APP-172]. Please comment on the modelling and assumptions included in this appendix.
1.11.9	Applicant	ES Appendix 11-4: Construction and Operation and Maintenance Noise Modelling Section 1.3 Construction Vibration [APP-172]. Please confirm which of the data on bored piling activities and data for driven piling activities would be associated with HDD.
1.11.10	Applicant	ES Appendix 11-4: Construction and Operation and Maintenance Noise Modelling Section Table 2 [APP-172] and ES Appendix 13-2: Traffic Flow Diagrams [APP-177] and ES Appendix 13-4: Transport Assessment [APP-179]. Please comment on why the base year within Table 2 of ES Appendix 11-4 is 2026 whereas the base year in ES Appendices 13-2 and 13-4 are 2028.
1.11.11	Applicant	ES Appendix 11-4: Construction and Operation and Maintenance Noise Modelling Section paragraphs 1.5.8 – 1.5.10 [APP-172] states the generator has a reported sound pressure level of 74.7 dB(A) when measured at 7m and it is assumed it would only operate to a maximum of 8 hours in any one year. What mitigation measures would be in place should the generator operate beyond 8 hours in any one year and how would this be monitored?
1.11.12	Applicant	ES Appendix 11-4: Construction and Operation and Maintenance Noise Modelling Section paragraph 11.7.13 [APP-172]. This paragraph states that consideration has been given to traffic routing, timing and access points to minimise noise impacts at existing receptors and HGVs managed through the CTMP with appropriate routing of construction and decommissioning traffic on public roads and along the access track within the CTMP. Please signpost where the information within the ES and fCTMP that explains the expected numbers of HGVs to access/ egress Access Points 2, 3, 5, 6, 7, 8, 9, 10 and 11 on a daily basis

Ref:	Question to:	Question:
		and over what time period can be found; and explain how minimisation of noise impact on receptors has been considered based on those numbers. Please signpost where within the fCTMP it explains what the access route and access points along the cable route would be and what vehicles are expected to use those access points.
1.11.13	Applicant	ES Chapter 11: Noise and Vibration paragraph 11.7.11 [APP-063] states that "*prior to commencement of any construction activities the Applicant will submit a voluntary application for prior consent to carry out noisy work under S61 […]*". However, the fCEMP [REP1-019] paragraph 2.5.1 and #NV-04 of the Environmental Commitments and Mitigation Register [APP-189] states that where on site works are to be conducted outside the core working hours, it is intended that the applicant will voluntarily apply for S61 consent under the Control of Pollution Act 1974. Please confirm whether a S61 consent would be obtained prior to commencement of any construction activities or only for those activities outside core working hours.
1.11.14	Applicant	ES Chapter 11: Noise and Vibration paragraph 11.7.12 [APP-063] and fCEMP page 69 [REP1-019]. The hierarchy of mitigation measures for continuous HDD activities at night appears not to align between ES Chapter 11 and the fCEMP. The fCEMP appears to omit the use of the option for open cut cable laying as an alternative. Please confirm whether it is intended that the fCEMP should not contain all the mitigation hierarchy as set out in paragraph 11.7.12 within ES Chapter 11; and if so why.
1.11.15	Applicant	ES Chapter 11: Noise and Vibration paragraph 11.7.12 [APP-063] and fCEMP paragraph 2.5.2 [REP1-019] states that acoustic barriers are proposed where nighttime HDD works are required to take place within 200m of a sensitive receptor. Please explain why acoustic barriers are not to be installed and used when HDD operations are taking place within 200m of a sensitive receptor during the daytime.
1.11.16	Applicant	ES Chapter 11: Noise and Vibration paragraph 11.8.18 [APP-063] states that as the drilling activities at the entry pit would generate the highest level of noise, calculations of noise have been based on a reasonable worst-case scenario that all potential HDD are entry pits. Based on Figure 2-4 Location of Temporary Construction Compounds and Indicative HDD Areas [APP-075], please explain which the HDD entry points are to appreciate the location of the worst-case scenario for sensitive receptors.
1.11.17	Applicant	ES Chapter 11: Noise and Vibration paragraphs 11.8.22 – 11.8.23 [APP-063]. Please confirm if other mitigation measures have been explored or considered for receptors R12, R17 and R31 to reduce the significant effect of noise from HDD activities.

Ref:	Question to:	Question:
1.11.18	Applicant	ES Chapter 11: Noise and Vibration paragraphs 11.8.26 – 11.8.33 [APP-063]. Paragraph 11.8.26 states that driving piling vibration calculations are based on regression analysis of driven piling data from Table D.2 of BS 5228-2 presented in ES Appendix 11-3: Baseline Noise Survey [APP-171]. Paragraph 11.8.27 states that regression analysis identifies that the SOAEL is potentially exceeded at receptors less than 60m from driven piling activities. Paragraph 11.8.33 says that bored piling calculations which would generate similar vibration levels to the proposed HDD activities, are also presented in ES Appendix 11-3. Please signpost where within ES Appendix 11-3 the piling data, the vibration information and data; and the regression analysis is located.
1.11.19	Applicant	ES Chapter 11: Noise and Vibration paragraphs 11.8.27 – 11.8.29 and Table 11-5: Thresholds of Potential Effects of Construction and Decommissioning Vibration (Human Response) [APP-063]. Please explain: a) why paragraph 11.8.27 says the Significant Observed Adverse Effect Level (SOAEL) for vibration levels is 1.5mm/s whereas Table 11-5 says the SOAEL is 1.0mm/s. b) if a SOAEL of 1.0mm/s instead of 1.5mm/s changes the conclusions set out in paragraphs 11.8.28-11.8.29. c) if a SOAEL of 1.0mm/s instead of 1.5mm/s is used, if this affects the findings of paragraph 11.8.27 with regards to the number of receptors where ground borne vibration effects are not significant. d) paragraph 11.8.28 says that approximately 5% of the area of Field SE2 is within 60m of R33. As paragraph 11.8.27 says that R33 is located at a distance of approximately 40m from potential piling activities in Field SE2, what percentage of the area of Field SE2 is within 40m of R33
1.11.20	Applicant	ES Chapter 11: Noise and Vibration paragraphs 11.8.38 – 11.8.39 [APP-063]. These paragraphs discuss changes in road traffic noise during the construction phase using a qualitative assessment. For Fenwick Common Lane it states that construction traffic noise effects would be negligible and not significant. This comment is based on approximately 16 light goods vehicle movements per hour. As 92 vehicles are proposed to access Fenwick Common Lane during AM development peak (0600-0700) (source Table 16: 2028 Baseline Traffic and Construction Traffic, ES Appendix 13-4: Transport Assessment [APP-179]) representing a 763.1% increase in traffic movements, please explain how this aligns with the conclusion in paragraph 11.8.39.

Ref:	Question to:	Question:
1.11.21	Applicant	ES Chapter 11: Noise and Vibration Table 11-13: HDD (NGA3) Noise Levels [APP-063]. Please confirm if the noise levels given in this table are for daytime or nighttime periods.
1.11.22	Applicant	ES Chapter 11: Noise and Vibration [APP-063]. Chapter 11 and its technical appendices provide an assessment of the likely significant effects from construction noise, operational and maintenance noise; and construction and decommissioning traffic noise. Please signpost where in Chapter 11 (or its technical appendices) there are details of a cumulative assessment for sensitive receptors that could be affected by both construction and decommissioning noise and construction and decommissioning traffic noise.
1.11.23	Applicant	The Environmental Commitment and Mitigation Register #NV-02 [APP-189]. • There appears to be a duplication within this commitment. Please comment. • Should item b. consider the use of multiple display boards at different locations around the site. • For item c. should the logbook of complaints include information on complaint resolution and outcome.
1.11.24	Applicant	The Environmental Commitment and Mitigation Register #NV-07 [APP-189]. Please comment on whether the fCTMP should be included within the column 'Commitment Securing Mechanism' for this commitment.
1.11.25	Applicant	The Environmental Commitment and Mitigation Register #NV08/ 09 and 10 [APP-189] all incorrectly refer to Requirement 13 fOEMP. We believe this should read Requirement 12 fOEMP.
1.11.26	Applicant	The Environmental Commitment and Mitigation Register #NV-12 [APP-189] states the distance to sensitive receptors would be kept as large as reasonably practicable with a minimum distance of 85m between HDD work sites and sensitive receptors. Please explain: a) the basis for 85m minimum distance set out in #NV-12 and what circumstances or criteria would trigger this minimum distance and why a larger distance is not sought. b) why HDD2 location is 75m from sensitive receptors (Bethal House, Blossom Cottage) and what mitigation measures would be necessary to ensure no impact on these receptors. Please confirm what monitoring would be undertaken when operating at a minimum distance of 85m to ensure no harm to sensitive receptors particularly at nighttime and if mitigation is required what that would be; or signpost where within the documentation this is detailed.

Ref:	Question to:	Question:
12.	**Socio-economics, tourism, and recreation**	
1.12.1	Applicant	The Framework Skills, Supply Chain and Employment Plan (fSSCEP) [APP-204]. ES21 Opportunity 3 – STEM Education and Careers says the applicant is exploring the use of a community benefit fund as part of the scheme. Please provide further details on the fund and whether, (and if so how) the applicant proposes to secure it in the dDCO.
1.12.2	City of Doncaster Council	The Local Impact Report [REP1-048] paragraph 11.8 comments that the fSSCEP [APP-204] could be more ambitious in respect of the number of people employed during construction within a 60-minute drive time. Please provide clarification on what further detail the CDC would wish to be included within this strategy.
1.12.3	City of Doncaster Council	The SoCG between CDC and the applicant [REP1-032] does not include Chapter 12: Socio-economics [APP-064] within those chapters that are acceptable for the assessment methodology or baseline assessment. Please comment on why this chapter has not been included within these parts of the SoCG.
1.12.4	Applicant	The fSSCEP paragraph 2.2.9 [APP-204]. Please signpost the actual figures for construction workers within the study area and outside the study area upon which the conclusions in this paragraph have been based.
1.12.5	Applicant	The fSSCEP paragraph 2.2.10 and Table 2: Gross Direct Value Added Per Annum from the Scheme During the Construction Phase [APP-204]. Please explain the differences in numbers given in paragraph 2.2.10 for the estimated amount construction would contribute to Yorkshire and Humber of £14.3Mpa compared to Table 2 of £12.6Mpa.
1.12.6	Applicant	ES Chapter 12: Socio-Economics and Land Use Table 12-20: Business Premises Within 500m of the grid connection corridor [APP-064]. Please comment why Branson Haulage are not contained within this table.
1.12.7	City of Doncaster Council	Are CDC satisfied that the applicant, through ES Appendix 12-2 Minerals Safeguarding Report [APP-174], have provided a mineral survey identifying the extent and quality of mineral and an estimate of the overall economic value.
1.12.8	Applicant	ES Appendix 12-2 Minerals Safeguarding Report [APP-174]. Please confirm the length of the grid connection corridor that would affect the minerals safeguarding area (MSA). Paragraph 2.3.3 of the Minerals Safeguarding Report states that approximately 1.47km is located within the MSA and a further 1.1km within the MSA buffer however paragraph 6.2.5 states that the maximum length of the grid connection corridor

Ref:	Question to:	Question:
		which overlies safeguarded mineral is around 3-4km in length "*therefore the land take associated with the Grid Connection Cables is relatively small as it will be a narrow linear feature*". Please explain this disparity and then how the land take would be relatively small given paragraph 2.3.3 says the total length of the grid connection corridor would be 5.6km.
13.	**Other planning matters**	
Waste		
1.13.1	Applicant	Paragraph 4.1.2 of the framework Site Waste Management Plan (fSWMP) [APP-208] states that excavated material is not included in the construction waste estimates or when calculating the overall waste recovery rate as the material would be reused on site where practicable. Please provide details on what activities would generate excavated waste, what the excavated waste would be comprised of and where it is anticipated this waste would be used on site to avoid removal. It is noted that paragraph 2.1.2(e) of the fSMP [APP-199] only refers to subsoil being retained on site for landscaping whereas paragraph 6.2.2 of the fSWMP refers to all soil. Please also confirm that excavated soils from the temporary compound areas would be held in stockpiles before being returned to the area they were stripped from.
1.13.2	Applicant	Please explain why the likely impact of an increase in the volume of materials having to be recycled locally, regionally and nationally has not been included at paragraph 14.8.62 of ES Chapter 14: Other Environmental Topics [APP-066] as a likely impact and effect.
1.13.3	Applicant	Paragraph 6.6.1 of the fSWMP [APP-208] says that excavated soils and earthworks materials would be stored onsite in stockpiles until required for use. There is a reference to the fSMP [APP-199]. The fSMP only refers to the storage of top and subsoils not excavated materials. Please clarify which document and where details for the methodology and location of excavated earthwork materials would be contained.
1.13.4	Applicant	Paragraph 14.8.68 of ES Chapter 14: Other Environmental Topics [APP-066] says that excavated material is not included in the construction waste estimate or when calculating the overall waste recovery rate as it would, where practicable, be reused on site and therefore not be categorised as waste. Paragraph 14.8.69 then says that total excavated material for the cable route trench dimensions would be approximately 42000m^3. Please clarify what would be the intended end use for that 42000m^3 and how would that align with the embedded mitigation referred to in paragraph 14.8.49 and good practice waste recovery.
1.13.5	Applicant	Please provide details on the failure rate of the solar PV panels on a yearly basis.

Ref:	Question to:	Question:
1.13.6	Applicant	Table 14-25 within ES Chapter 14: Other Environmental Topics [APP-066] has columns for the amount of panel waste, other waste and total waste in tonnes. The rows within the table for total waste from cumulative developments, waste to landfill (realistic worst-case scenario), waste to landfill (absolute worst-case estimate); and regional landfill capacity are all in metres cubed (m^3). It is unclear whether the figures provided for within these rows are in tonnes or m^3. Please confirm and please provide the figures in both tonnes and m^3. Please confirm what is anticipated to be the hazardous waste component in m^3 of the solar panels.
Ground Conditions and Land Contamination		
1.13.7	Applicant	Chapter 14: Other Environmental Topics [APP-066] and paragraph 2.10.4 of the fCEMP [REP1-019] refer to the potential for a Materials Management Plan (MMP) to be developed under the CL:AIRE Definition of Waste: Development Industry Code of Practice. Please signpost the information outlining what the trigger would be, and when it would be triggered, for the production of a MMP. Please clarify why the production of a MMP is not included within Table 3-16 within the fCEMP. Please clarify why a reference to the CL:AIRE code has not been provided within the fSMP [APP-199].
1.13.8	Environment Agency	In your relevant representation [RR-003], you note that within ES Appendix 14-3: Phase 1 Preliminary Risk Assessment [APP-183] paragraph 12.1.3, the applicant states that the proposed ground investigation works can be used to allow for considering options for appropriate reuse. However, the Environment Agency also say the scope of the works suggested in paragraphs 12.1.1 and 12.1.2 are unlikely to be sufficient to inform assessments for reuse of material but that any additional sampling could be carried out at a later time when earthworks requirements are better understood. Please provide clarification on what further details would be required.
1.13.9	Environment Agency	The Environment Agency's relevant representation [RR-003] has stated that Thorpe Marsh Power Station is a permitted landfill and there are monitoring boreholes located within the former Thorpe Marsh Power Station. Please confirm which monitoring boreholes would be impacted by the proposal and what they monitor alongside what safeguards are expected from the applicant.
1.13.10	Applicant	The Environment Agency's relevant representation [RR-003] has stated that refuelling should take place on impermeable surfaces. Please explain why this is not contained within the Mitigation and Commitment Register [APP-189] or the fCEMP [REP1-019].

Ref:	Question to:	Question:
1.13.11	Applicant	ES Appendix 14-4: Phase 1 Preliminary Risk Assessment – grid connection corridor [APP-184]. Please provide context as to what the figures in Table 3-2: Estimated Soil Chemistry column 2 'Estimated Geometric Mean Concentration 9mg/kg)' means for each potentially harmful element and each Section and where those definitions originate.
BESS		
1.13.12	Applicant	The Framework Battery Safety Management Plan (fBSMP) [APP-205]. Please explain why the Draft Guidance on Grid Scale Battery Energy Storage Systems (BESS) by the National Fire Chiefs Council (NFCC) (the 2024 document) has been applied instead of the published, and not yet revoked, Version 1.0 November 2022 guidance (the 2022 guidance).
1.13.13	South Yorkshire Fire and Rescue Service	The ExA notes that the applicant has referred to the Draft Guidance on Grid Scale Battery Energy Storage Systems (BESS) by the National Fire Chiefs Council (the 2024 document) within the fBSMP [APP-205]. Please comment on the appropriateness of using this document instead of the 2022 guidance.
1.13.14	Applicant	The fBSMP [APP-205] paragraph 2.1.23 (b) says the BESS layout "*allows for a separation distance of 3m between BESS enclosures and ESS equipment, and 3 m between adjacent BESS enclosures. This exceeds the NFPA 855 (2023) guidelines of 3 feet, considered safe practice by the latest NFCC guidelines if UL 9540A testing shows propagation does not occur*". The 2022 guidance states that access between BESS units and unit spacing should be a minimum of 6m unless suitable design features can be introduced to reduce spacing. Please provide evidence and information to demonstrate what suitable design features have been introduced that would make the 3m separation distances acceptable. As the NFCC 2024 guidance has not been published, please confirm what alternative design options have been investigated to accommodate a 6m BESS unit spacing and whether this would result in a reduction in the 432 batteries that would be on site and if so, by how much.
1.13.15	South Yorkshire Fire and Rescue Service	Please comment on the proposed reduced distance of 3m between BESS units as stipulated within fBSMP [APP-205] paragraph 2.1.23 and that the applicant states they can demonstrate suitable design features for this.
1.13.16	South Yorkshire Fire and Rescue Service	Further to the comment made in your relevant representation [RR-009] please comment on the fBSMP [APP-205] in relation to:

Ref:	Question to:	Question:
		a) the nature and number of the proposed accesses to the BESS please see Figure 2-3 Indicative Site Layout sheet 5 of 11 [APP-074]. b) The volume of water supply proposed. c) The measures to contain fire water.
1.13.17	South Yorkshire Fire and Rescue Service	Please comment on the parameters, risk management and response plan, monitoring provisions and scope of the fBSMP [APP-205].
1.13.18	Applicant	In response to South Yorkshire Fire and Rescue Service relevant representation [RR-009], please confirm why the distance of 10m from BESS enclosures to any planted combustible vegetation is not contained within the ODPS [APP-193].
1.13.19	Applicant	Paragraph 3.6.5 of the fBSMP [APP-205] says that "*The emergency response plan (ERP) produced at the detailed design stage (template outlined in Paragraph 4.5.5) will incorporate all necessary emergency response procedures and actions based upon comprehensive thermal runaway test data supplied by the BESS system provide*r". Section 4 pre-construction Information Requirement contains section 4.1 only. Please signpost where within the documentation or fBSMP the template ERP is as referred to in paragraph 3.6.5.
1.13.20	Applicant	Section 2.1.25 of the fBSMP [APP-205] provides details of the type of foundations that may be used. If ground screws or piles are to be used, they should not affect the impermeable nature of the attenuation basins within the BESS area to ensure any contaminated water from fire suppression is contained. Please confirm this would be the case and confirm how this would affect the fBSMP.
1.13.21	Applicant	Please explain why the BESS has not been located on previously developed land for example at the Thorpe Marsh substation.
1.13.22	Applicant	Paragraph 2.1.16 of the fBSMP [APP-205] states that the location of the BESS has been based on a number of factors with a pertinent factor being to maximise the distance to receptors where practical. There are minimum offsets then provided in subpoints a) - j). Please clarify why all of these subpoints have not

Ref:	Question to:	Question:
		been carried through into the ODPS [APP-193] under the heading 'Location' as the reference to residential property has done.
1.13.23	Applicant	Paragraph 1.4.1(h) and 2.1.10 of the fBSMP [APP-205] says if the BESS system is designed to safely burn out to remove the risk of stranded energy in the battery systems, then full scale free burn testing will have been conducted to demonstrate that loss will be safely limited to one container without the intervention of SYFR. Please confirm who will carry out the full-scale free burn testing and when this would occur in the process.
Electromagnetic Fields		
1.13.24	Applicant	ES Chapter 14: Other Environmental Topics [APP-066] paragraph 14.7.18 refers to the Planning Circular 01/0318: Safeguarding Aerodromes, Technical Sites and Military Explosive Storage Areas. Please confirm if this is a typo and should be Planning Circular: 01/03.
Lighting		
1.13.25	Applicant	The Planning Statement [APP-190] paragraph 4.2.27 states that lighting for the construction compounds would be covered within the fCEMP [REP1-019] with the exact detail being covered by Requirement **12**. Please comment on whether this should be Requirement **11** or whether this sentence relates to another aspect.
Air Quality		
1.13.26	Applicant	ES Chapter 14: Other Environmental Topics [APP-066] paragraphs 14.2.37 – 14.2.39 covers emissions from non-road mobile machinery (NRMM) stating emissions from NRMM would be controlled through best practice measures. Please explain why this aspect is not detailed within the fCEMP [REP1-019].
1.13.27	Applicant	ES Chapter 14: Other Environmental Topics [APP-066] paragraph 14.2.58 and Table 14-4: Representative Dust Risk Receptors and Figure 14-1 Dust Risk Assessment [APP-128]. Whilst Figure 14-1 identifies dust risk assessment (DRA) receptors as small triangles around the order limit, the ExA consider it would assist the reader if Figure 14-4 could be annotated with the Receptor IDs listed in Table 14-4.
1.13.28	Applicant	The Department for Environment, Food and Rural Affairs (Defra) published interim guidance in October 2024 related to the Environment Act Particle Matter ($PM_{2.5}$) targets and applies to future developments where planning applications have been submitted post 4 October 2024. The guidance emphasises the

Ref:	Question to:	Question:
		importance of implemented appropriate mitigation measures during the design stage to minimise $PM_{2.5}$ emissions and exposure than assessing the likelihood of exceeding the limit value. Please clarify: a) How has exposure to $PM_{2.5}$ has been considered when selecting the development site. b) What actions and/ or mitigations have been considered to reduce $PM_{2.5}$ exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of $PM_{2.5}$ and its precursors. c) if no mitigation measures have been implemented, why this was not proposed.
1.13.29	Applicant	Given the potential for overlap of construction vehicles at Thorpe Marsh Substation and the number of proposals identified (and in some cases where planning permission has now been granted) within the cumulative impact short list (table 15-4: Short List of Other Developments ES Chapter 15: Cumulative Effects and Interactions [APP-067]), please review the approach to the availability of information for cumulative schemes. Please also consider whether the section titled 'Cumulative Effects' of section 14.2 of ES Chapter 14: Other Environmental Topics [APP-066] requires updating particularly given planning application 23/00793/FULM has been granted planning permission.
14.	**Compulsory Acquisition and related matters**	
1.14.1	Applicant	There are a number of plots identified in the Book of Reference (BoR) [REP1-009] for which the owners are not known. Please provide an update on efforts to establish these owners/interests and details on what further steps will be undertaken to identify these owners prior to the exercise of CA powers.
1.14.2	Applicant	Annex C of the CA Guidance indicates (at paragraph 4) that where it is necessary for the Land Plan to have more than one sheet, appropriate references must be made to each of them in the text of the draft order so that there is no doubt that they are all related to the order. Please signpost where these can be found or include appropriate references in subsequent versions of the dDCO.
1.14.3	Applicant	The ExA notes the concerns raised by Able UK Limited and Elba Securities Limited [AS-003 and REP1-057] in relation to its land interests and in particular the proposed CA powers in relation to plot 10/05. Please can the applicant explain the need for CA powers over this plot, what rights are being sought and how it proposes to ensure that existing infrastructure is protected.

Ref:	Question to:	Question:
1.14.4	Applicant	Paragraphs 1.3.3 and 4.1.4 of the Statement of Reasons (SoR) [APP-018] explains that a grid connection line drop is being explored as an alternative to the proposed grid connection corridor and will be determined by National Grid post any grant of development consent. The ExA notes that, if viable, this would result in a considerable reduction in the amount of land subject to CA powers (around 98ha). Please can the applicant explain why this option is only to be determined after any grant of development consent and how this accords with paragraph 8 of the CA guidance which indicates that the applicant should be able to demonstrate that all reasonable alternatives to CA, (including modifications to the scheme) have been explored.
1.14.5	Applicant	The SoR [APP-018] contains various references to the applicant's 'Outline Design Principles' document. Please confirm that the document being referred to is the ODPS [APP-193].
1.14.6	All Affected Persons (APs)	APs are asked to please provide comments on the following: a) If they are aware of any inaccuracies in the BoR [REP1-009] the Statement of Reasons [APP-018] or the Land Plan [APP-006]. If so, please indicate where these are and provide the correct details. b) Views on whether there may be any reasonable alternatives to CA or Temporary Possession (TP) sought by the applicant. c) Views on whether there are any areas of land or rights that the applicant is seeking the power to acquire that you consider are not needed. d) Details of any other concerns relating to the legitimacy, proportionality or necessity of the CA or TP powers sought by the applicant that would affect the land that you own or have an interest in.
1.14.7	Applicant	Part 2 of the BoR [REP1-009] lists ‘Category 3’ persons. The applicant is asked to: a) provide further detail/justification of how you have identified Category 3 persons for the purposes of the BoR; c) clarify if there are any persons who might be entitled to make a relevant claim if the DCO were to be made and fully implemented, and who should therefore be added to the BoR as a Category 3 person.

ExQ1 issued on Friday 9 May 2025. Responses are due by deadline 2 (Wednesday 28 May 2025)

Ref:	Question to:	Question:
1.14.8	Applicant	The ExA notes the comments contained in [REP1-063] in relation to the impact of the proposed development on the ability to access this affected person's property. Please explain whether, and if so how, the proposed development would affect access to that property.
1.14.9 M	Mr Henstock	Please explain how the proposed development would restrict access to your property (and identify the relevant plot by reference to the land plans [APP-006]
1.14.10	Applicant	The ExA notes that the Land Rights Tracker [REP1-043] indicates that the applicant is in negotiations with the owners of plot nos. 6/06, 6/07, 6/08, 8/06, 8/12, 8/14, 8/15, 8/16, 9/01 and that negotiations are in the final states. Does the applicant anticipate concluding those negotiations before the close of the examination?
1.14.11	Applicant	The ExA notes that heads of terms were signed for plot nos. 7/03 and 7/04 in September 2024. Please explain why no further progress with formal agreements has been made since this time.
1.14.12	Applicant	For plot nos 9/02 and 9/04, please provide details of attempts to contact the landowner.
1.14.13	Applicant	Please provide a copy of the letter from BT referred to in the Land Rights Tracker [REP1-043] which confirms it supports the use of standard protective provisions for the protection of operators of communications code networks.

END