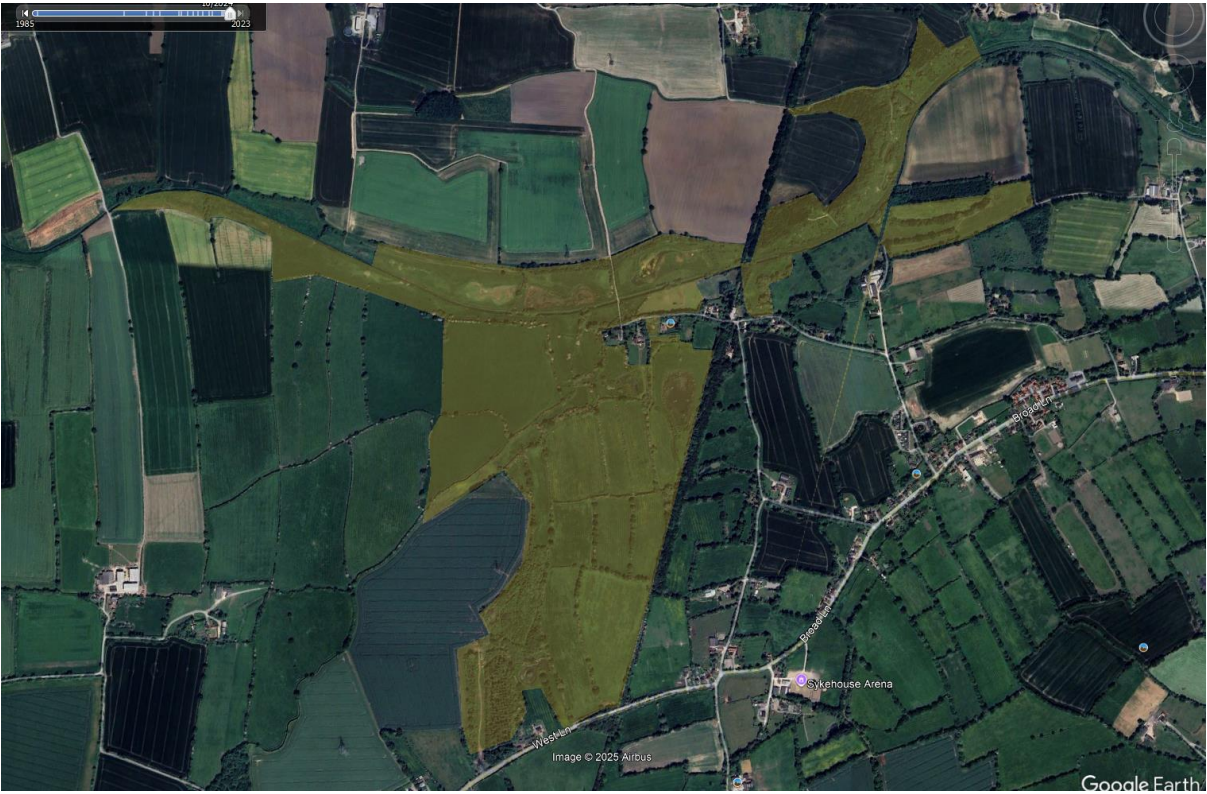


The Burnet Heritage Trust's (BHT) response to ExQ1 (issued Friday 9th May 2025), including.

- Comments relevant to Question 1.6.1
- An answer to Question 1.6.2
- Comments and new information relevant to Question 1.6.8
- Comments and new information relevant to Question 1.6.9.
- Comments relevant to Question 1.6.18
- Comments relevant to Question 1.6.20 and 1.6.21



Ref:	Question to:	Question:
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.
The Burnet Heritage Trust; Comments relevant to Ref 1.6.1		<p>In response to the Trust's submission for SSSI status at Topham, Natural England has confirmed that they "<i>are not taking any additional sites further at this time.</i>"</p> <p>The Trust's ecologists have presented data to show that the proposed SSSI meets the criteria set out by Natural England for SSSI designation and believe that the land should be treated as such in this situation. BOOM's Ecology Chapter details that candidate Local Wildlife Sites which have not yet been designated are included as they are being considered for designation and may become so within the lifetime of the Scheme; it therefore follows that candidate SSSIs should also be assessed as such.</p> <p>Natural England's lack of resources and their inability to process new submissions should not be a reason to disregard sites that meet the given criteria (based on evidence submitted by qualified ecologists) when those sites are potentially at risk, and ignoring the data would be neglectful.</p>
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].

Ref:	Question to:	Question:
The Burnet Heritage Trust; Response to Ref 1.6.2		<p>The Burnet Heritage Trust's SSSI submission was placed before the Examining Authority, along with additional relevant representation, before Deadline 1 [REP1-054]. Page two of this document sets out the proposed boundary of the candidate SSSI, and details as follows:</p> <p><i>"The current potential designation application consists of 289 acres of lowland riparian grassland along the River Went, together with a series of small ponds and wetlands between the Fleet Drain and disused railway embankment at Topham. The areas form a single contiguous unit of habitat, where sympathetic management has been ongoing for more than two decades, resulting in a particularly well-preserved biodiversity. "</i></p>  <p>Figure 1. Map showing the location of proposed SSSI, to the North-west of Sykehouse village (53.6489755,-1.0640457</p>

Ref:	Question to:	Question:
1.6.8	Applicant	<p>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:</p> <ul style="list-style-type: none"> • 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.
The Burnet Heritage Trust; Comments relevant to Ref 1.6.8		<p>The Burnet Heritage Trust welcomes the Examining Authority's queries regarding the thoroughness of bird surveys. The Trust has provided information to direct interested parties to the sources of the relevant data (REP1-054).</p>
The Burnet Heritage Trust; New information relevant to Ref 1.6.8 and the proposed issue-specific hearing (ecology and mitigation).		<p>The Trust would again query the omission of curlew records from the applicant's surveys and the species listed above (1.6.8). The Trust has provided records on numerous occasions, and a recent EIR data request confirmed that Natural England also accepts the presence of curlew in the area.</p> <p>See attached documents: EIR202504725_24-01-24_email_Redacted EIR202504725_EIA letter_Redacted</p> <p>In correspondence with the landowner, NE asked the landowner to confirm in which of the land parcels under investigation, curlews had attempted to breed. In their letter to the landowner regarding the outcome of their investigation, they state "...we found evidence of curlew breeding in the vicinity..."</p> <p>As the Government's own conservation agency is satisfied that there is evidence of Curlew in the area, the Trust would ask that the presence of Curlew be accepted and for the Impact Assessment to be reviewed to provide the necessary mitigation.</p>
1.6.9	Applicant	<p>The Burnet Heritage Trust relevant representation [RR-011] raises concerns that inclusion of fields SE6 and SE7 would result in a disproportionately 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:</p> <p>a) how it represents good design?</p>

Ref:	Question to:	Question:
		<p>b) the ecological impacts that result from the inclusion of these fields.</p> <p>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.</p>
The Burnet Heritage Trust; Comments relevant to Ref 1.6.9		The Trust welcomes further examination of the value of fields SE6 and SE7 to both the solar project and biodiversity.
The Burnet Heritage Trust; New information relevant to Ref 1.6.9 and the proposed issue-specific hearing (ecology and mitigation).		The Trust has previously drawn attention to the fact that an area of Coastal/ Floodplain and Grazing Marsh, within the development area, was sprayed and ploughed by the landowner in September 2023. The Trust would like to draw attention to the fact that Natural England investigated this matter concerning the Environmental Impact Assessment Regulations 2006. Natural England chose to take no action against the landowner on this occasion but confirmed that <i>"the project carried out and the type of land affected would most probably have fallen within the scope of the Regulations, requiring a screening application by you [landowner] prior to work being started."</i> The area has therefore already suffered habitat loss, making robust mitigation measures even more important, particularly for the curlew, now confirmed by a Statutory Body to be in the area.
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.
The Burnet Heritage Trust; Comments relevant to Ref 1.6.18		To date, the Trust has limited its comments to the actual PV site at Fenwick, but we support YWT's concerns about the scope of the surveys undertaken on the grid connection corridor to Thorpe Marsh and the protection of Bunfold Shaw Ancient Woodland in the event that the grid connection line drop is utilised. The corridor covers over 100 hectares and a mosaic of habitats. Inadequate mitigation along this corridor would compound the already poor mitigation being offered for other areas within the development boundary, and the loss of the Floodplain Grazing marsh that has already occurred.
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.

Ref:	Question to:	Question:
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.
The Burnet Heritage Trust; Comments relevant to Ref 1.6.20 & 1.6.21		<p>Several of the questions within ExQ1 relate to the lack of assessment or acknowledgement of the cumulative impact of the development on key areas of functionally linked land.</p> <p>Representation from Natural England raises concerns about the loss of functionally linked land for Humber Estuary SPA and RAMSAR birds, foraging nightjars around Thorne and Hatfield Moors, and numerous SSSIs in the vicinity of the development area.</p> <p>Natural England recommends that further information be sought in the assessment of the loss of functionally linked land, including justification for screening species out of the assessment where relevant. The trust would echo these concerns and recommendations, as we feel the importance of the habitats within and adjacent to the development area, as functionally linked land to key national sites, has been dismissed by the applicant.</p>