

Date: 23 July 2025  
Our ref: 518668  
Your ref: TR030008



The Planning Inspectorate  
Major Applications & Plans  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

[fenwicksolar@planninginspectorate.gov.uk](mailto:fenwicksolar@planninginspectorate.gov.uk)

**BY EMAIL ONLY**

Dear Inspector,

**NSIP Reference Name / Code: EN010152**

**Natural England's initial response to the Examining Authority's (ExA's) second written questions and requests for information (ExQ1).**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

For any further advice on this consultation please contact the case officer Nicholas White at [██████████@naturalengland.org.uk](mailto:██████████@naturalengland.org.uk) and copy to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

██████████  
Yorkshire and Northern Lincolnshire Area Team  
Natural England

# 1. Natural England's response to the Examining Authority's (ExA's) second written questions and requests for information (ExQ2)

Table A: Natural England's response to ExQ2 (9 July 2025)			
ExA question ref	Question addressed to	Question	Answer
Q1.6.10	Natural England, City of Doncaster Council	<p><i>Breeding Bird Report [APP-152], Breeding Bird Report – Annex A (Confidential) [APP-153] and Non-Breeding Bird Report [APP-154].</i></p> <p>The Burnet Heritage Trust (BHT) have questioned the thoroughness of the breeding bird and non-breeding bird surveys conducted for the project, the data used and the omission of curlew records from the applicant's surveys ([RR-011], [REP1-054], [REP2-075] and [REP3-035]). Please comment on the bird survey methodology and approach for the project and the comments raised by the BHT on this matter.</p>	<p>Natural England has no outstanding concerns with the non-breeding bird survey methodology. We have agreed that the proposed survey methodology is appropriate to inform an assessment of whether the site provides functionally linked land for Humber Estuary SPA/Ramsar/SSSI birds in this case. However, additional available evidence should also be considered by the applicant to determine whether it affects the conclusions of the NSER.</p> <p>We do not have comments to make on the breeding bird surveys as these do not fall within our remit. We would defer to City of Doncaster Council's advice on this matter and highlight <a href="#">Protected species and development: advice for local planning authorities - GOV.UK</a>. Relevant additional evidence should be considered in the assessment of impacts.</p>
Q1.6.23	Natural England	<p><i>NSER Rev 3 [REP2-038] and the BHT responses at relevant representations [RR-011], deadline 1 [REP1- 054], deadline 2 [REP2-075] and deadline 3 [REP3-035].</i></p> <p>The BHT have commented that for Pink Footed Goose, European Golden Plover, Eurasian Curlew and Eurasian Marsh Harrier, these bird species are of a number that would make them functionally linked to the Humber Estuary Special Protection Area (SPA) / Ramsar site. The BHT also say that the spatial distribution of both local scape observations and</p>	<p><u>Thorne &amp; Hatfield Moors SPA</u></p> <p>Note that Thorne &amp; Hatfield Moors SPA is designated for breeding nightjar only and there is no designated bird assemblage feature. Therefore, it is not a requirement to assess impacts to other bird species in the NSER for Thorne &amp; Hatfield Moors SPA. Natural England agrees with the justification for ruling out likely significant effects on nightjar in the NSER.</p>

Table A: Natural England's response to ExQ2 (9 July 2025)			
ExA question ref	Question addressed to	Question	Answer
		<p>region observation rates demonstrates a very clear spatial link between birds occurring within the order limits of the DCO and those breeding and roosting on Thorne Moor SPA. The BHT comment that the reporting demonstrates how the feeding areas of the DCO are linked to breeding populations of Thorne Moors Special Area of Conservation (SAC) and Humber Estuary SPA. Please comment on the points raised by the BHT within their written representations on these bird species being functionally linked to Thorne Moor SPA/ SAC and Humber Estuary SPA/ Ramsar; whether the number of qualifying bird species in the area in question is too low and/ or the area of land is too small to be classified as functionally linked. Please comment whether the comments raised by the BHT would alter the outcomes and conclusions of the NSER.</p>	<p><u>Humber Estuary SPA/Ramsar</u></p> <p>We have provided some species-specific comments relating to the Humber Estuary SPA/Ramsar below:</p> <p><i>Pink-footed goose</i></p> <p>For pink-footed goose, we recommend that the applicant obtains the data mentioned by the BHT from the relevant records centre/s. The data should be assessed in the context of the Humber Estuary SPA/Ramsar to determine whether they affect the conclusions of the NSER.</p> <p>We note that a response has previously been provided by the applicant in:  <a href="#">EN010152-000502-8.20 Applicant's Responses to Submissions Received at Deadline 1.pdf</a>.</p> <p>However, we advise that the additional data should be assessed in more detail to determine whether significant counts of pink-footed geese have been recorded feeding within the red line boundary. Although Natural England has previously agreed with the applicant's justification in the NSER based on the non-breeding bird survey results, we advise that this justification would not necessarily apply if there is robust evidence that pink-footed geese have been recorded in higher numbers (<math>\geq 1\%</math> of the Humber Estuary population) within the site boundary. Further assessment would be required in such a case.</p> <p>All relevant data should be reviewed to determine the number and regularity of pink-footed geese recorded within the DCO boundary. The methodology of the records should be</p>

Table A: Natural England's response to ExQ2 (9 July 2025)			
ExA question ref	Question addressed to	Question	Answer
			<p>considered. It should be clarified from the data referred to by the BHT whether the birds recorded 'dropping onto the DCO area' in October 2024 were recorded feeding within the DCO boundary. The assessment should also consider relevant factors such as the spatial distribution of the birds and habitat/crop type at the time of different surveys to understand patterns of usage and potential impacts and determine whether the NSER conclusions are affected.</p> <p><u>Golden plover</u></p> <p>Natural England considers that the current NSER sufficiently assesses impacts to golden plover, based on available evidence. The additional information presented by the BHT on regional sightings does not directly relate to this site and is not anticipated to affect the conclusions of the NSER.</p> <p><u>Curlew</u></p> <p>We note that the BHT have recorded curlew within the DCO boundary, and the relevant data should be assessed in the context of impacts to breeding birds (see above 1.6.10).</p> <p>However, Natural England advises these pairs would not be considered functionally linked to the non-breeding waterbird assemblage of the Humber Estuary SPA/Ramsar or the breeding assemblage of the SSSI. This is due to the timing of recordings and location of nesting sites:</p> <ul style="list-style-type: none"> <li>• The curlew pairs were recorded during the breeding season so are not considered part of the non-breeding waterbird assemblage.</li> </ul>

Table A: Natural England's response to ExQ2 (9 July 2025)			
ExA question ref	Question addressed to	Question	Answer
			<ul style="list-style-type: none"> <li>For curlew pairs to be considered part of the Humber Estuary SSSI breeding assemblage, they would have to be nesting within the SSSI. As the birds observed on the site were nesting outside the SSSI, they would not be considered part of the breeding assemblage. The distance between the site and the Humber Estuary is also beyond the expected normal range of foraging curlew.</li> </ul> <p><u>Marsh harrier</u></p> <p>Marsh harriers are not a designated feature of the Humber Estuary SPA/Ramsar during the non-breeding period.</p> <p>Marsh harrier are a designated breeding feature of the Humber Estuary SPA; however, the birds were recorded in the non-breeding season so are not considered breeding birds.</p> <p>Marsh harrier are not considered part of the non-breeding waterbird assemblage, as they do not fall within the definition of 'waterbirds' (as defined by the Ramsar Convention and applied in <a href="#">The UK SPA network: its scope and content (Volume 1 – Rationale for the selection of sites)</a>).</p> <p>Potential wider impacts to foraging marsh harrier from the proposals should be considered and suitable foraging areas should be provided, but the review of the suitability of the scheme design falls outside Natural England's remit for NSIPs in this context.</p>