



**The Burnet Heritage Trust's Comments on the Examining Authority's Second Written Questions (ExQ2)**  
**For submission by Deadline 4 (23<sup>rd</sup> July 2025).**

The Burnet Heritage Trust welcomes the Examiner's questions to the applicant and statutory consultees, which further explore the issues raised by the Trust.

Trustees have additional information to provide to the Examiner regarding ExQ2 1.6.8 and 1.6.23, detailed in the table below.

At the time of submissions for Deadline 3, the Trust also forwarded comments and past submissions directly to Natural England, to ensure they had the opportunity to review them, as Trustees came to understand they may have only had occasion to review submissions from the applicant. Given their ongoing capacity issues, we were grateful to receive a response from a Natural England Officer shortly afterwards, advising that they would review the information in due course and would respond to the Examiner's questions at Deadline 4.

Since our last representation, we have also learned that a second landowner in the DCO area (Atkinson) changed their land use from pasture to crop agriculture in September 2023, at the inception point of the scheme, potentially in contravention of planning rules or Environmental Impact Assessment (Agriculture) No. 2, Regulations 2006. We would request that the Examining Authority ask the applicant to provide details of all land use changes that have occurred within the DCO area since initial communication with the applicant. We are concerned that the converted land will represent a degraded baseline in BNG calculations.

| Ref:   | Examiner's Question to:                  | Question:   | BHT Comment   |
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| <b>6. Biodiversity (including HRA and Biodiversity Net Gain)</b> |  |   |   |
| 1.6.8  | City of Doncaster Council, the applicant | Please confirm who currently has responsibility for the Went Valley LWS within the Order limits and who would be responsible for its management during the life of the project, and how this would interact with the management plans.  | <p>Please note that Fleet Ings (Burnet Heritage Trust site on the opposite bank of the Went to the development area) has historically been designated a LWS by North Yorkshire Council (NYC), and they have recently surveyed the site again.</p> <p>On advisement, BHT will also notify the CDC about the suitability of Topham Ings (adjacent to Fleet Ings) for LWS designation.</p> <p>Both sites lie within the candidate SSSI.</p>  |
| <b>No Significant Effects Report (NSER)</b>                      |  |   |   |
| 1.6.23   | Natural England                          | <p>NSER Rev 3 <a href="#">[REP2-038]</a> and the BHT responses at relevant representations <a href="#">[RR-011]</a>, deadline 1 <a href="#">[REP1-054]</a>, deadline 2 <a href="#">[REP2-075]</a> and deadline 3 <a href="#">[REP3-035]</a>.</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 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</p> | <p>With specific reference to Pink-footed Goose, we which to restate the information provided at Deadline 3 <a href="#">[REP1-054; 2.3.3]</a>.</p> <p><i>“Given the number seen regularly flying over and dropping down within the DCO, it is likely that these birds were regularly feeding within the DCO area also. At least 300 were observed dropping onto the DCO area from Topham on 14<sup>th</sup> October 2024 (<a href="https://ebird.org/checklist/S198919715">https://ebird.org/checklist/S198919715</a>), with a total of 3500+ flying over (either continuing or potentially landing). A significant proportion of these birds’ roost around Humberhead Levels NNR and the Humber Estuary SPA &amp; RAMSAR, suggesting an important contribution to the functionally linked populations. Maximum roosting totals on include 6,000 on Thorne Moors NNR (<a href="https://ebird.org/checklist/S121158258">https://ebird.org/checklist/S121158258</a>),</i></p> |

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|      |                         | <p>Thorne Moors Special Area of Conservation (SAC) and Humber Estuary SPA.</p> <p>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>12,000 on Hatfield Moors NNR (<a href="https://ebird.org/checklist/S121442283">https://ebird.org/checklist/S121442283</a>) and 24,000 Read's Island RSPB within the Humber Estuary SPA &amp; RAMSAR site (<a href="https://ebird.org/checklist/S198652369">https://ebird.org/checklist/S198652369</a>).</p> <p><i>Considering these sightings, it is the view of the BHT that the DCO area constitutes a periodically important foraging area for the Pink-footed Goose population of the region, with potentially as much as 0.6% of the UK population (7% of the Humber Estuary SPA / Humberhead Levels NNR population) using the area as an important stopover."</i></p> <p>We wish to emphasise that this constitutes a shift of the UK population, to regularly utilising Hatfield &amp; Thorne Moors as a wintering site in considerable numbers. This shift has taken place over the past ~10 years and is not reflected in records previously available to Natural England. In fact, such high totals constitute an important part of the UK winter population (which is itself represents around 75% of the global population). Totals are now sufficient to constitute an 'interesting feature' in the SPA designations of Thorne and Hatfield Moors. The flocks observed feeding in the DCO area are undoubtedly functionally linked to these populations.</p> |