



**City of
Doncaster
Council**

Planning Act 2008 (As Amended)

Infrastructure Planning (Examination Procedure) Rules 2010

City of Doncaster Council's response to The Examining Authority's written questions and requests for information (ExQ2): Issued on 07 July 2026

Project: Tween Bridge Solar Farm (EN010148)

Applicant: RWE Renewables UK Solar and Storage Limited

Unique Reference: F2CFC15A3

21st July 2026

Application by RWE Renewables UK Solar and Storage Limited for Tween Bridge Solar Farm Project
The Examining Authority's written questions and requests for information (ExQ2): Issued on 07 July 2026

City of Doncaster Council (CDC) Responses to Questions for CDC. See ExQ1 questions for the full list of questions.

ExQ2	Question to:	Question:	CDC Response:
2. Biodiversity and ecology (Including Habitat Regulations Assessment)			
Q2.2.5	City of Doncaster Council (CDC), North Lincolnshire Council (NLC) and the applicant	Biodiversity Net Gain (BNG) Monitoring CDC's LIR [REP1-062] paragraph 9.35 sets out its suggested requirements for monitoring of BNG. It suggests that a Habitat Management and Monitoring Plan (HMMP) should be produced and implemented with involvement from both CDC and NLC. It suggests that normally a section 106 agreement (s106) would secure this. In response [REP2-089], the applicant has stated: 'The Outline Landscape and Ecology Management Plan [Document Reference 7.6 Revision 3] is secured by Requirement 8 of Schedule 2 to the draft DCO [Document Reference 3.1 Revision 4]. The Outline Landscape and Ecology Management Plan includes relevant implementation and monitoring requirements, particularly in Table 4-1 and sections 6 and 7.' Can CDC, NLC and the applicant set out their latest position on this and, where relevant, make reference to any precedent in solar Development Consent Orders (DCO) for approaches to BNG monitoring?	Background The Biodiversity Net Gain Assessment report as set out in document Reference: 6.3.7.12 June 2026 Revision 3 [REP3-028] may need further revision which will be dependent upon the inclusion of a single type of post development grassland type under and between solar panels. After final revisions and acceptance of the BNG outcomes the delivery of a Habitat Management and Monitoring Plan ("HMMP") using the standard DEFRA template will be required. Although not a mandatory requirement for this proposal the applicant is keen to replicate the mandatory process to ensure best practice and therefore the LPAs should be fully involved in the post development on site delivery, through the approval of the HMMP and monitoring of habitat delivery. The principle of monitoring the on-site delivery of Biodiversity Net Gain follows the approval of the Biodiversity Gain Plan which sets out in detail the delivery of on-site biodiversity net gain. Ordinarily, this is secured through a section 106 agreement which ensures a greater degree of legal weight to guarantee the delivery of all the net gain habitats at target conditions. Any section 106 should also provide for an appropriate monitoring fee to be paid to CDC. This is paid to ensure consistency and compliance throughout the on-site habitat management period.

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			Requirement 8 Disappointingly, the Applicant has not indicated a willingness to enter into a section 106 agreement along the lines mentioned above. Without prejudice to CDC’s preferred position (i.e. that there should be a section 106 agreement) CDC would comment as follows as requirement 8 (landscape and ecology management plan). Regarding requirement 8(3)(a) CDC notes the LEMP must include, for each phase, details of the extent to which the phase contributes to ensuring the authorised development achieves a minimum of 10% BNG during its operational lifetime. Unlike equivalent requirements in other DCOs, requirement 8(3)(a) makes no reference to area-based habitat units, hedgerow units, or watercourse units. For instance, the One Earth Solar Farm Order 2026 was made on 8 July 2026. Requirement 9(2) (biodiversity net gain) of that Order states – “The biodiversity net gain strategy must include details of how the strategy will secure a minimum of 50% biodiversity net gain in area-based habitat units, a minimum of 50% biodiversity net gain in hedgerow units, and a minimum of 10% biodiversity net gain in watercourse units for all of the authorised development during the operation of the authorised development, using the Department of

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			Environment, Food and Rural Affairs’ Statutory Biodiversity Metric to calculate those percentages (or such other biodiversity metric approved by the relevant planning authority in consultation with the relevant statutory nature conservation body)”. [Emphasis added]. Similarly, the Dean Moor Solar Farm Order 2026 (SI 2026/754), which was made on 2 July 2026, includes requirement 7(2) (landscape and ecological management plan) which states – “Any LEMP submitted for approval under sub-paragraph (1) must be in accordance with the outline LEMP and must demonstrate how a minimum biodiversity net gain of 60% for area habitat units, 20% for hedgerow units and 5% for watercourse units, calculated using the Department of Environment Food and Rural Affairs’ Statutory Biodiversity Metric (February 2024), or if this is withdrawn or replaced, a biodiversity metric approved by the local planning authority in consultation with the relevant statutory nature conservation body, will be delivered”. [Emphasis added]. In addition, and most pertinent for CDC, requirement 8(2) (biodiversity net gain) of the Fenwick Solar Farm Order 2026 states – “The biodiversity net gain strategy must include details of how the strategy will secure a minimum of 20% biodiversity net gain for habitat units, a minimum of 20% biodiversity net gain for hedgerow units and a minimum of 10% biodiversity net gain for watercourse units, calculated using the Department of the Environment, Food and Rural

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			Affairs' Statutory Metric (July 2025), or if this is withdrawn or replaced, a biodiversity metric approved by the relevant planning authority in consultation with the relevant statutory nature conservation body and must be implemented as approved". [Emphasis added]. It is not clear from either the Explanatory Memorandum or the Outline Landscape Ecological Management Plan why a similar drafting approach has not been followed here. To allow CDC to understand the Applicant's reasoning, it would be helpful if the Applicant could explain why no reference is made to these matters in the requirement.
5. The draft Development Consent Order (DCO)			
Q2.5 Articles			
Q2.5.4	CDC	Draft DCO [REP3-006] Articles 11 and 12 Could CDC please provide an updated response on the suitability of article 12 (and specifically 12(4)), taking into account ongoing progress and/ or discussions between CDC and the applicant?	On 13 July 2026, the Applicant shared its proposed amendments to Part 3 (streets) of the draft DCO with CDC officers. These amendments include (as new article 12) an article which provides for the application of CDC's permit scheme to the instant project. CDC welcomes this amendment. CDC hopes that further agreement can be reached in terms of the inclusion of satisfactory highways protective provisions. CDC had hoped to submit these into the Examination at deadline 4; however, these are being finalised. CDC now intends to share the highways protective provisions with the Applicant before Deadline 5.

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Q2.5.5	CDC and NLC	Draft DCO [REP3-006] Article 13 CDC's position on the 28 day period is noted. Could NLC please confirm whether a deemed consent period of 28 days is acceptable (please give reasons in your response)?	Based on previous discussions between CDC and NLC officers, CDC understand NLC supports CDC's position.
Q2.5 Schedules			
Q2.5.1	CDC	Schedule 2 – Requirement 12 [REP3-006] Could CDC please explain why it requires the submission of a further iteration of the Outline Archaeological Mitigation Strategy (oAMS)? What is likely to change, if anything?	The Outline Archaeological Mitigation Strategy (oAMS) [REP2-045] is a framework document that identifies a range of archaeological mitigation measures that may be applied across the Order Limits. At this stage, it does not assign specific mitigation measures to particular areas of the site nor does it set out detailed archaeological objectives for each area. Following completion of the evaluation phase, the proposed amendment to Requirement 12 would allow the oAMS to be updated and submitted as a Final Archaeological Mitigation Strategy (Final AMS). The Final AMS would set out the agreed archaeological mitigation for specific areas of the site and would incorporate the Archaeological Mitigation Statements referred to in paragraph 9.2 of the oAMS. In CDC's view, this would provide a clearer and more transparent mechanism for documenting agreed archaeological mitigation and would consolidate archaeological decisions within a single approved document. It would also record the agreed approach in areas where no further archaeological investigation is required (and therefore no WSI is required) including locations where

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			archaeological remains are to be preserved in situ through the design of the scheme.
6. Cultural heritage			
Q2.6.3	CDC and the Applicant	Archaeology CDC's LIR [REP1-062] paragraph 8.30 states in part: 'In order for appropriate weight to be given to the effects of the proposals on the significance of any affected heritage assets, it will be necessary for the Applicant to demonstrate that sufficient flexibility remains within the scheme design and the mitigation options to respond to archaeological discoveries made and to avoid unnecessary harm.' Could CDC please elaborate and explain what this would look like in practice? Could the applicant also provide a response?	CDC's position, as set out in the LIR, is that sufficient weight can only be given to the potential effects on heritage assets where there is a clear understanding of both: • the likely archaeological significance of different parts of the Site; and • the extent to which individual scheme components can be modified or relocated in response to archaeological discoveries. While the Applicant has identified design flexibility as a characteristic of solar farm development, it is recognised that the degree of flexibility is not uniform across all elements of the scheme. Some components may be more constrained in their location or may result in greater levels of ground disturbance than others. CDC therefore considers that the Applicant should demonstrate how the anticipated archaeological significance of different areas relates to the flexibility available within the scheme design and how this relationship would inform the selection of appropriate mitigation measures should archaeological remains be identified. In practice, the datasets gathered for the heritage baseline suggest the varying archaeological sensitivities across the order limits. These can be used as a proxy for significance

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			and, when mapped against the different impacts of the components of the scheme, produce a zoning plan which spatially defines the anticipated magnitude of effects. This spatial definition provides a mechanism for understanding the degree of design flexibility available within particular locations of the scheme and therefore the extent to which adverse effects on archaeological remains can be avoided through design changes or whether alternative mitigation measures would be necessary.
Q2.6.4	Applicant, CDC and NLC	Archaeology Could the applicant please provide a response to the assertions made at paragraphs 8.19 to 8.29 of CDC's LIR [REP1-062]? Specifically, could the applicant explain whether it considers that it has sufficiently taken a holistic approach to the consideration of below ground heritage assets and the extent to which they are likely to be present? Please could both Councils and the applicant also provide an update on discussions with regard to the extent of archaeological works to be secured post consent (in the event that consent is granted)? Any disagreement should be clearly explained with reasons given.	The broad framework for post-consent archaeological works is currently set out within the oAMS [REP2-045]. However, detailed discussions regarding the precise extent of archaeological works that may ultimately be required post-consent have not yet been concluded. Discussions between the Applicant, SYAS (on behalf of CDC) and NLC have instead focused on the development of the zoning plan as a means of understanding the varying archaeological sensitivities and potential impacts across the Order Limits, and thereby informing a proportionate approach to any future archaeological works. Following discussion at ISH2, the Applicant revised the zoning plan which had been submitted as part of the updated oAMS [REP2-045] to include two figures. Those figures were subsequently discussed at a meeting between the Applicant, SYAS and NLC. During that meeting, SYAS provided detailed comments regarding the incorporation of existing archaeological

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			datasets and other baseline evidence, with the aim of enabling the zoning plan to better illustrate the varying potential magnitude of effect across the Order Limits. It was agreed that a further iteration of the zoning plan would be prepared and submitted at Deadline 5. Discussions regarding the detailed scope of post-consent archaeological works remain ongoing and will continue to be informed by the development of that zoning plan.
9. Land use, soil and ground conditions			
Q2.9.3	Applicant, CDC and NLC	Unexploded Ordnance (UXO) risk assessment The applicant has submitted a Detailed Unexploded Ordnance Risk Assessment (Rev 1) [REP3-030]. Could the applicant confirm how the recommendations of this assessment would be implemented? It is noted that some measures are set out at paragraphs 5.15.1 to 5.15.10 of the CEMP [REP3-030]. However, paragraph 20.1 of the risk assessment [REP3-030] states in part: “It is recommended that a site-specific plan for the management of UXO risk be written for this site. This plan should be kept on site and be referred to in the event that a suspect item of UXO is encountered at any stage of the project. It should detail the steps to be taken in the event of such a discovery, considering elements such as communication, raising the alarm, nominated responsible persons etc.(ExA emphasis added).	CDC has reviewed the Detailed Unexploded Ordnance Risk Assessment [REP3-030] and offer the following observations: The risk assessment/report appears comprehensive and provides appropriate consideration of the various types of UXO that could potentially be encountered within the site. The assessment also draws upon relevant historical information relating to the area, which is important in establishing an evidence-based understanding of the potential risk and ensuring the assessment is proportionate and robust. With regard to mitigation measures, CDC supports the recommendation that a site-specific UXO Management Plan should be developed and implemented. In addition, information relating to UXO risks and procedures should be made readily available to personnel working on the site through inductions, regular briefings, and appropriate on-site signage/posters.

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		Please append this management plan to the CEMP, OEMP and DEMP. Details of UXO risk management should be set out in the OEMP and DEMP bearing in mind the risks associated with ‘maintenance’ and decommissioning works respectively. Could CDC and NLC provide any representations on the applicant’s risk assessment [REP3-030]?	CDC’s rationale for supporting these measures is set out below: • Parts of the proposed development site are located in relatively close proximity to residential properties. As such, the discovery of UXO could present a risk not only to site personnel but also to local residents. • Early identification and reporting of suspected UXO will be critical in ensuring that appropriate specialist advice and intervention can be sought at the earliest opportunity. • Clear and effective incident management arrangements should be established and maintained to ensure a prompt, coordinated, and proportionate response in the event that a suspected UXO item is discovered. • Consideration should also be given to the potential wider impacts on the local community. The discovery of UXO may necessitate a multi-agency emergency response, including evacuation of neighbouring properties and the establishment of exclusion zones while assessment and disposal activities are undertaken. • Depending on the nature and size of any item located, disruption may extend beyond the immediate site area. In some circumstances, specialist transportation of UXO to a safe disposal

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			location may be required, potentially affecting local residents and transport networks. A recent example of the potential scale of such impacts occurred in Plymouth in 2024, where the discovery of a large World War Two bomb resulted in the evacuation of approximately 10,000 residents whilst the ordnance was safely removed and disposed of. See: https://www.bbc.co.uk/news/uk-england-devon-68390787 It's also worth noting as well as the primary risks from UXO i.e. detonation, explosion, fire etc, dependent on the type of UXO there could be a risk from chemicals leading to increased risk to those exposed and/or to the environment. An explosion may also cause damage to other infrastructure causing disruption to utility supplies for example. On this basis, CDC supports the recommendation that a dedicated UXO Management Plan is developed and incorporated within the relevant Construction, Operational and Environmental Management Plans, together with suitable training, awareness and incident response arrangements for those working on the site.
13. Transport and access			
Q2.13.1	CDC and NLC	Abnormal Indivisible Loads (AIL) Are the Councils satisfied with the applicant's approach to AILs set out in its response to written question 13.0.5 [REP2-087].	CDC is generally satisfied with the applicant's approach to AILs set out in its response to written question 13.0.5 [REP2-087]. However the following requirements should be met as part of the approach:

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			• Agree that movements for AILs need to be agreed with CDC, NLC, the Police but should also include National Highways; • All movement applications should be made by the haulier to ESDAL (Electronic Service Delivery for Abnormal Loads) which will serve as the conduit and set out the communications of AIL movements; and • Any removal of street furniture or temporary alterations to the highway to accommodate AIL movement would be at the cost of the developer. CDC also has a concern about the hardstanding area and length from the highway boundary into each of the development parcels; CDC has been unable to find where construction for these is specified.
14. Other matters			
Q2.14.2	CDC	Air Quality CDCs LIR [REP1-062] states at paragraph 14.7: “CDC is still considering the air quality impacts of the development and whether there would be more prescriptive requirements in relation to PM10s than the nuisance regime and what measures are likely to be required to mitigate any likelihood of nuisance arising.” Could CDC please confirm its position on the air quality effects of the proposed development? In responding, please take into account the construction management measures proposed by the applicant.	Having further reviewed Chapter 12 of the Environmental Statement Appendix 1.2: Applicant’s EIA Scoping Report [APP-058], Environmental Statement Chapter 14 : Air Quality & Greenhouse Gases [REP2-025] and Environmental Statement Appendix 14.5: Construction Mitigation [APP-119] CDC confirms that it is satisfied that the development is unlikely to have a significant detrimental effect on air quality. Additionally, CDC can confirm that it is satisfied with the proposed dust mitigation measures contained in Environmental Statement Appendix 14.5: Construction Mitigation [APP-119] for air quality as these follow the guidance contained in IAQM Guidance on the assessment of

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			dust from demolition and construction. As long as the proposed mitigation measures are implemented, CDC requires no further assessment for air quality.