



City of
Doncaster
Council

Deadline 5 Submission

Project: Tween Bridge Solar Farm (EN010148)

Applicant: RWE Renewables UK Solar and Storage Limited

Unique Reference: F2CFC15A3

4th August 2026



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1. Introduction:

- 1.1 This document sets out the Deadline 5 Submission of City of Doncaster Council (“CDC” or “the Council”) in response to the Tween Bridge Solar Farm Project (“the proposed development”). The proposed development is being progressed by an application for Development Consent by RWE Renewables UK Solar and Storage Limited (“the Applicant”).
- 1.2 This submission provides CDC’s comments on the answers to ExQ2 and any further information requested by the ExA including any further information requested by the ExA under rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010, and comments on any further information received by Deadline 4. As no further information has been requested by the ExA from the CDC under rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010, this response is limited to comments on the answers to ExQ2 and comments on the further information received by Deadline 4, in accordance with the ExA’s Rule 6 Letter of 13th March 2026
- 1.3 The ExA should note that unfortunately the period for responses to be submitted at Deadline 5, has coincided with the summer 2026 holiday season, during which a time a substantial proportion of the CDC team have been on annual leave. It has therefore not been possible to submit a full set of responses within the timeframe available up to Deadline 5. CDC may accordingly make additional submissions at a later date if it considers it necessary to do so, but will in meantime seek continue on-going dialogue with the Applicant in relation to any relevant matters.

2. Responses to ExQ2

- 2.1 The following sections set out comments from CDC in response to the ExQ2 submissions. They only refer to those questions where the CDC has comments to make.

Responses to ExQ2 Q2.6.5 Archaeology

- 2.2 In their response to ExQ2 Q2.6.5 [\[REP4-062\]](#), the Applicant has addressed suggested changes to the DCO wording “to require the Applicant to submit a final Archaeological Mitigation Strategy, in addition to the Outline Archaeological Mitigation Strategy” [\[REP4-034\]](#). For clarity, CDC does not see this as an additional document but rather an update to the outline Archaeological Mitigation Strategy [\[REP4-034\]](#) with site specific detail so that it becomes the Final Archaeological Mitigation Strategy, recording actual decisions taken.
- 2.3 More detail on CDC’s position is given in the answer to ExQ2 Q2.5 Schedules Q2.5.1 [\[REP4-082\]](#).

Q2.9.3 Unexploded Ordinance (UXO) Risk Assessment

- 2.4 CDC has reviewed the Applicant's response to Q2.9.3 Unexploded Ordinance (UXO) Risk Assessment, and is satisfied that no amendments are required.

3. Comments on any further information received by Deadline 4

- 3.1 The following sections set out comments from CDC on any other information received by Deadline 4:

Landscape and Visual

- 3.2 CDC notes that the land and visual impact assessment (LVIA) set out in 6.2.6 Environmental Statement Chapter 6 Landscape and Visual (Clean) (Rev 4) [REP4-021] has been updated to include sections on the two more recent character assessments (as requested) and the value of the landscape outside national designations in accordance with the Landscape Institute's Technical Guidance Note 02/21 Assessing landscape value outside national designations (TGN02-21)¹. The CDC has only had limited opportunity to review this, but from what has briefly been reviewed, it would continue to make the point that the landscape character has been under valued and underplayed in the LVIA.
- 3.3 Within the LVIA, baseline information has been added and then a statement on the susceptibility, value and sensitivity for these additional character areas made. However, no explanation is included on how the conclusion on value, susceptibility and sensitivity has been made. All the character areas added have been given a medium value, medium susceptibility to the development and medium sensitivity.
- 3.4 For example, Hatfield Chase Levels LCA (from the 2014 character assessment) is summed up in LVIA paragraph 6.4.51 [REP4-021] stating that the 'Hatfield Chase Levels LCA is considered to be of medium sensitivity based on medium susceptibility and medium value'. The description prior to this statement, extracted from the LCA text, includes the bullet points – 'Important historic landscape', 'rare historical settlement pattern'; 'strongly geometric landscape, dominated by big skies with a marked sense of space'. CDC considers that it is difficult to see how an area with that description would not be considered high value. It also does not understand why it would not have a high susceptibility to the type of development proposed when a large portion of the proposals lie within it. This would result in a high sensitivity.
- 3.5 Similarly, in relation to the Trent Levels – flat Open Remote Farmland (in the NLC study) includes key characteristics including 'the landscape has been

¹ <https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2021/05/tgn-02-21-assessing-landscape-value-outside-national-designations.pdf>

described as remote, although this now feels to have been eroded due to the significant vertical intrusion of the windfarm to the west of Medge Hill'. This CDC considers demonstrates that the landscape is already under pressure and changing as a result of development, so a solar development would add to this pressure, meaning the landscape is highly susceptible (not medium).

- 3.6 And in relation to the Thorne and Crowle Moors (2014 LCA) they are described as 'internationally designated for their important raised bog habitats', 'one of the largest lowland raised bogs in Britain', 'remote, peaceful and largely inaccessible' but are summed up in the LVIA as being of medium value, medium susceptibility, medium sensitivity.
- 3.7 Other character areas have been addressed in a similar manner with medium value, medium susceptibility and medium sensitivity being the default for all character area added.
- 3.8 The assessment includes additional text on landscape value. From a brief reading of this CDC would question how, for example, Factor 2 – Cultural Heritage, can be recorded as medium considering the historical land use associated with this area. The value assessment has been carried out on the order limits as a whole and since the character areas have been downplayed, the CDC considers that it is no surprise, that the value of the whole area has been assessed as 'medium'. It goes on to give the whole site a susceptibility of 'medium' and sensitivity of 'medium'.
- 3.9 CDC has not yet had the opportunity to consider the assessment more fully, but would continue to make the point that it considers that the landscape character has been undervalued and underplayed in the LVIA.

Ecology

6.2.7 Environmental Statement Chapter 7 Ecology and Nature Conservation (Clean) (Rev 4) [REP4-024].

- 3.10 Referencing the written summary of oral submissions made at hearings in the week commencing 22nd June 2026 and paragraph 4.3-4.4 of CDC's Deadline 3 Submission [REP3-081] CDC requested simplification and re-drawing of the mitigation mapping as the mapping in earlier versions of Outline Landscape Ecological Management Plan (oLEMP) was very crowded and confusing. Revision 5 of the oLEMP [REP04-055] provides at Drawing Nos 16413/P20 Sheets 1 to 7 showing the detailed mitigation measures requested by CDC. These drawings provide clearly defined areas of mitigation with accurate buffer zone locations and widths and fulfil the requirements of CDC.
- 3.11 At paragraph 4.5 of CDC's Deadline 3 Submission [REP3-081] CDC requested cross sections of breeding bird mitigation areas and in an e-mail message

(Tyler Grange 24th July 2026) covering other ecological matters the Applicant's ecologist responded stating that:

".... in our D4 updates we addressed all the comments received previously, including detailed in your Written summary of oral submissions made at hearings in w/c 22 June 2023 [REP3-081]. Unfortunately we were not able to provide cross-sections of mitigation areas as we do not have the graphics capability to complete this, but we did include additional text and photographs within the OLEMP that should provide the detail you required."

3.12 This additional information along with the drawings 16413/P20 Sheets 1 to 7 are acceptable to CDC and compensates for the lack of cross sectional illustrations .

3.13 At paragraph 4.16 of CDC's Deadline 3 Submission [REP3-081] CDC requested, following internal and external consultation; the undertaking of water quality assessments:

"In respect of water quality the Council requests that Applicant confirms whether they will have a water quality monitoring regime as . It is easy to assume that the cessation of arable cropping with absence of inputs and land/soil disturbance will lead to improved water quality as stated 3.2.3 of the oLEMP [REP2-070] But, it should not be assumed that this is the case and there should be some monitoring over a 10 year period at specific locations to ensure that these benefits do accrue and that there are not other adverse impacts that are currently unknown. The Council also requires the Applicant to confirm if there is any potential for unexpected contaminating inputs as a result of the locations of the panels, e.g. any fixings or connecting equipment. It is understood that there is a significant stand-off between the operational areas and watercourses but gravitational effect cannot be easily overcome. The Council considers that a water quality monitoring programme should be put in place. It would request that the Applicant puts forward a water quality monitoring plan that includes:

- Objectives of water quality monitoring;*
- Sampling locations;*
- The types of pollutants to be tested at sampling locations;*
- Frequency and duration of monitoring programme; and*
- Reporting and sharing of data reviews.*

3.14 CDC does not consider this to be a disproportionate requirement but will consider a review after 3 and 5 years with an option to terminate sampling if water quality is shown to be unaffected by the solar farm.

Biodiversity Net Gain (BNG)

- 3.15 Referencing 6.3.7.12 Environmental Statement Appendix 7.12 Biodiversity Net Gain Assessment (Rev 3) (Clean) [\[REP3-028\]](#) CDC is pleased to see the matter of strategic significance so fully addressed at paragraphs 3.7 to 3.8 even though the South Yorkshire Local Nature Recovery Strategy is still in the later stages of its preparation.
- 3.16 Following representations set out paragraph 4.6 of Council's Deadline 3 Submission [\[REP3-081\]](#) and supported by a South Yorkshire wide approach to solar panel grassland types and BNG, the Applicant's at paragraph 3.13 of 6.3.7.12 Environmental Statement Appendix 7.12 Biodiversity Net Gain Assessment (Rev 3) (Clean) [\[REP3-028\]](#), have agreed that a single grassland type of low distinctiveness should be used for the habitat type under and between the solar panels. This has resulted in a far less complicated post development habitat matrix and as explained by CDC, such a change of this type where arable land is being used for the development, CDC considers that this will not jeopardise the significant biodiversity unit surplus.
- 3.17 Also in response to earlier CDC previous representations the inclusion of solar panel infrastructure and mounting systems has been taken into account and now is included as 10% developed land 'habitat under each panel. This has come about through positive discussions between CDC and the Applicant's ecologists to deliver an acceptable approach to dealing with the often ignored elements of solar panel array construction and operation.
- 3.18 At paragraph 4.7 of Council's Deadline 3 Submission [\[REP3-081\]](#) CDC raised the matter of the breaking of trading rules within the first version of the BNG assessment. CDC pointed out that where a surplus has been generated through the BNG assessment process it is unacceptable through the BNG DEFRA User Guide (2026) to break trading rules and be in surplus. The Applicant's ecologists have addressed this error and have changed habitat losses with appropriate higher value replacement habitat. CDC are now satisfied with the biodiversity net gain assessment as shown in 6.3.7.12 Environmental Statement Appendix 7.12 Biodiversity Net Gain Assessment (Rev 3) (Clean) [\[REP3-028\]](#).
- 3.19 CDC has on several occasions alerted the Applicant that because they have chosen to follow the mandatory Biodiversity Net Gain process and replicate all the steps in the process, they should ensure that both a Habitat Management and Monitoring Plan (HMMP) and a Net Gain Plan are submitted. The approval of these by the LPA should be part of the process and the delivery of 'post intervention' habitats should be steered by the HMMP and alongside this, there should be an agreement between the Applicant and the LPA for monitoring by the LPA to be carried out as is the case in mandatory BNG with an attached monitoring fee. This should all be secured by a Section 106 agreement.

However as this is a DCO process and not a standard planning application there may be some other form of legal agreement that secures the monitoring and the fees.

Public Rights of Way

6.2.12 Environmental Statement Chapter 12: Transport and Access (Rev 3) [\[REP4-015\]](#)

- 3.20 The CD notes that on page 37 of document 6.2.12 Environmental Statement Chapter 12: Transport and Access (Rev 3) [\[REP4-015\]](#) it states at paragraph 12.4.34, that a number of Public Rights of Way (PRoW) are routed through or abut the Order Limits. These are shown on ES Figure 12.1 - Indicative Access Strategy [APP 164] and are summarised in Table 12-9.
- 3.21 CDC however notes that Public footpath No.15 Thorne referred to in the table has been omitted from the plan and is not shown on ES Figure 12.1 - Indicative Access Strategy [\[APP 164\]](#). This accordingly needs updating to include public footpath Thorne15.

Development Consent Order [\[REP4-004\]](#)

Land Contamination

- 3.22 Since the Deadline 4 submission of the responses to ExQ2, CDC has been contacted by the Environment Agency, restating the concerns that it set out in its written summary of oral submissions made at the hearings in week commencing 22nd June 2024 [\[REP3-082\]](#) and explaining why it considers that an additional requirement is needed in relation to the management of the risk of contamination, including securing the necessary contamination assessments before remediation works can take place. CDC would support the concerns set by the Environment Agency in its submission. It is also concerned in the light of comments from the Environment Agency that the fee regime covers CDC's actual costs of discharging requirements and other consents under the Order, as set out below.

Amendments to articles 11 to 14

- 3.23 CDC notes the amendments made to articles 11 (street works), 12 (application of permit scheme), 13 (application of the 1991 Act) and 14 (power to alter layout, etc. of streets) of the draft DCO [\[REP4-004\]](#). After Deadline 4, CDC submitted its proposed highways protective provisions into the Examination. The Applicant has commented on, and proposed amendments to, the same, and CDC is considering those comments and amendments. CDC is considering the amendments to the articles mentioned above in the context of the amended

highways protective provisions and intends to revert to the Applicant on the same shortly.

Amendments to articles 16, 17 and 19

- 3.24 CDC welcomes the amendments made to articles 16(10) (temporary closure or restrictions of streets and public rights of way), 17(3) (access to works) and 19(9) (traffic regulation measures) whose effect is to follow the deeming provision included in each of those articles with a provision which requires the undertaker to inform the authority of the deemed provision when it makes the application. CDC considers there should be corresponding provision which states that if that information is not included, the deeming provision will not apply. The corresponding provision should also be included in article 14 (power to alter layout, etc. of streets) after existing paragraph (6).

Amendments to paragraph 4 of part 2 of Schedule 2

- 3.25 In respect of the amended fees regime included at paragraph 4 of part 2 of Schedule 2, CDC notes the following text from the Applicant's Schedule of Changes to the Draft Development Consent Order [\[REP4-067\]](#): "Following discussions with City of Doncaster Council (CDC) regarding the Draft DCO [Document Reference 3.1. Revision 7], the Applicant has amended the fee structure for applications to discharge the Schedule 2 requirements to align with recent solar precedent including the One Earth Solar Farm Order 2026 and the Springwell Solar Farm Order 2026".
- 3.26 CDC would stress that it maintains its position set out in previous submissions: it is essential that the fee regime covers CDC's actual costs of discharging requirements and other consents under the Order. It is not clear that the amended fee regime will secure this and CDC intends to continue discussions with the Applicant on paragraph 4 (amongst other provisions) to ensure the Order includes a satisfactory mechanism for costs recovery.