

# **Supplementary Written Representation on Behalf of Fields for Farming (FFF) Community Group – F4E ECC D3C**

**Submitted to: The Examining Authority for the Steeple Renewables Project (EN010163)**

**Date: 28<sup>th</sup> October 2025**

**Reference: Relevant Representation RR-035**

## **1. Introduction**

### **1.1.**

This Supplementary Written Representation is submitted by Fields for Farming (FFF), a community group representing the interests of residents in Sturton le Steeple, Fenton, Littleborough, North Leverton, and North and South Wheatley (the “Residents”). It builds upon our initial Relevant Representation (RR-035, dated 28 August 2025) and provides further evidence and analysis to oppose the application for a Development Consent Order (DCO) by Steeple Renewables Limited (the “Applicant”) for the Steeple Solar Farm and Battery Energy Storage System (BESS) (the “Proposed Development”).

### **1.2.**

As detailed in RR-035, the Proposed Development’s scale (approximately 888 hectares, equivalent to 1,700 acres) would engulf Sturton le Steeple, transforming a rural, arable landscape into an industrial site for up to 60 years. This would have profound negative impacts on community life, ecology, and the local economy. Our 2024 survey of 745 residents showed 99% opposition to the scale, underscoring widespread concern.

### **1.3.**

This submission draws on the Applicant’s Environmental Statement (ES) (APP-057 to APP-177), including key chapters on

Landscape and Visual Impact (Chapter 6, APP-064),

Ecology and Biodiversity (Chapter 7, APP-065),

Hydrology and Flood Risk (Chapter 8, APP-066),

Cultural Heritage (Chapter 9, APP-067),

Socio-Economics (Chapter 10, APP-068),

Noise and Vibration (Chapter 11, APP-069),

Transport and Access (Chapter 13, APP-071), and

Land Use and Agriculture (Chapter 15, APP-072).

It also references the Examining Authority’s (ExA) Report for the Tillbridge Solar Project (EN010142, dated 14 July 2025), a comparable NSIP approved despite identified

weaknesses, to highlight parallels and argue that Steeple's harms outweigh benefits under Section 104(7) of the Planning Act 2008.

#### 1.4.

The Tillbridge ExA assigned "great weight" to harms in heritage and landscape (Sections 3.5 and 3.7), "moderate weight" to cumulative effects and BMV land loss (Sections 3.4 and 3.10), and noted gaps in surveys and mitigations. Steeple exhibits similar flaws, exacerbated by its proximity to Tillbridge's cumulative schemes (e.g., West Burton Solar, EN010132; Cottam Solar, EN010133) and others.

We urge the ExA to reject the DCO, or at minimum, require substantial redesign to, avoid BMV land use, reduce scale, and enhance mitigations.

#### 1.5.

FFF reserves the right to supplement this representation as the examination progresses, including at Issue Specific Hearing 1 (ISH1) on 12 November 2025 and further discretionary ISH meetings currently proposed to be held in February 2026.

#### 1.6.

Our comments are structured under the categories in RR-035, with cross-references to Tillbridge and Steeple documents.

## **2. Cumulative Impact**

#### 2.1.

As in RR-035 (Section 2), the Proposed Development's cumulative effects with existing/approved NSIPs and major projects (e.g., West Burton Solar and BESS, EN010132; Sturton Quarry, NCC V/4386) and proposed projects (e.g., STEP Fusion; Grid Upgrade, FN0200034) are inadequately assessed. The ES Cumulative Effects Assessment (Figure 2.2, APP-142; Appendix 2.3, APP-088) lists 37 developments but omits STEP and the Grid Upgrade, despite their scale (e.g., STEP's £2.5bn investment and 15-year construction period to then commence first operations in the early 2040s.; Grid Upgrade's 41-51m pylons near Sturton le Steeple).

#### 2.2.

Tillbridge's ExA (Section 3.4) assigned "moderate weight" to cumulative harms, criticizing isolated assessments and underestimation of landscape "solar-domination." Steeple's adjacency to West Burton amplifies this: combined, these schemes could industrialize 90% of Sturton le Steeple's parish (Figure 1 in RR-035). The ES (Chapter 2, APP-060) fails NPS EN-1 (para 4.3.1) requirements for robust in-combination effects, ignoring synergies like shared traffic routes or compounded habitat loss.

#### 2.3.

STEP (at former West Burton A) will dominate the area both during construction (expected 15+ years) and its period of operation from 2040 onwards, yet Steeple's ES ignores it. Table 1 in RR-035 highlights energy inefficiency: Steeple's 180,000 homes

powered (per hectare: 203) versus West Burton A's 7,200,000 (35,468 per hectare). Cumulative traffic (e.g., Steeple's 24-month construction overlapping STEP/Quarry) risks gridlock on rural roads, unaddressed in the Transport Assessment (Appendix 13.1, APP-128).

#### 2.4.

We note and support the ExA's suggestion that it will factor in and ask questions of the applicant on the interrelationship of the proposed development with other proposed projects, particularly the North Humber to High Marnham project and STEP Fusion Project, amongst others.

### **3. Ecology, Biodiversity, and Wildlife**

#### 3.1.

As in RR-035 (Section 3), the ES (Chapter 7, APP-065) reveals survey gaps (e.g., incomplete access, weather disruptions) and inadequate mitigations, risking harm to protected species. Tillbridge's ExA (Section 3.3) noted similar baseline deficiencies (e.g., bats/badgers) and assigned "a little weight" to residual harm, questioning post-consent plans like the Landscape and Ecological Management Plan (LEMP, Appendix 7.14, APP-116).

#### 3.2.

Breeding/Wintering Birds: Surveys limited by access (Appendix 7.4/7.6, APP-106/APP-108) underestimate impacts; skylark mitigation (Appendix 7.13, APP-115) compensates only 55-64% of territories, per RR-035 (3.17). Tillbridge flagged cumulative bird displacement; Steeple's overlap with other large scale projects in the area exacerbates this.

#### 3.3.

Bats/Badgers: Omission of emergence surveys (Appendix 7.7, APP-109) contravenes guidelines; badger setts (62 active, Appendix 7.8, APP-110) face disruption. Tillbridge criticized bat/badger mitigations; Steeple's LEMP lacks detail.

#### 3.4.

Great Crested Newts/Otters/Water Voles: Unsurveyed ponds (Appendix 7.10, APP-112) create uncertainty; invasive species risks (Appendix 7.11, APP-113) unmitigated. Nottinghamshire Wildlife Trust (email 20 Aug 2025, cited in RR-035) echoes concerns.

#### 3.5.

Biodiversity Net Gain (BNG, Appendix 7.12, APP-114): Partial hedgerow surveys and no mandatory 10% gain limit benefits. CPRE research (cited in RR-035) shows minor gains/losses in similar projects.

#### 3.6.

Brown Hares/Barn Owls: Omissions (RR-035, 3.18-3.24) risk legal breaches. We urge pre-determination surveys and enhanced LEMP, as also noted in Tillbridge's ExA recommendations.

## **4. Flood Risk**

### **4.1.**

As in RR-035 (Section 4), the Proposed Development risks exacerbating flooding in Flood Zones 2/3 (ES Chapter 8, APP-066; Flood Risk Assessment, Appendix 8.1, APP-117). Tillbridge's ExA (Section 3.12) noted flood zone vulnerabilities and required robust drainage; Steeple's Surface Water Drainage Strategy (Appendix 8.2, APP-120) underestimates cumulative run-off with STEP/Quarry.

### **4.2.**

Impermeable panels and soil compaction could increase run-off to villages (e.g., Beckingham Marshes floods). The FRA ignores climate change over 60 years (NPPF para 172-181). Wheel washing (Outline CTMP, Appendix 13.2, APP-129) may compound issues.

### **4.3.**

Request revised FRA with cumulative modeling, as per Tillbridge precedent.

## **5. Loss of BMV Agricultural Land, Food Security, and Socio-Economics**

### **5.1.**

As in RR-035 (Section 5), the scheme removes ~888 ha of BMV land (Grades 2/3a, Appendix 15.1, APP-131), breaching NPS EN-3, NPPF (para 187), and May 2024 WMS. Tillbridge's ExA (Section 3.10) assigned "moderate weight" to 111 ha BMV loss, criticizing alternatives; Steeple's Site Selection (Chapter 3, APP-061) dismisses brownfield without justification.

### **5.2.**

Food Security: DEFRA data shows UK self-sufficiency at 60%; East Midlands output £3.9bn. Steeple impacts 12 farms (39-71% land loss), rendering four unviable. No long-term jobs (Appendix 10.1, APP-127).

### **5.3.**

Bassetlaw Local Plan (ST49) requires cumulative assessment; Steeple's ES ignores this. Request alternatives evidence, per Tillbridge.

## **6. Road Safety, Construction Traffic, Transport, and Access**

### 6.1.

As in RR-035 (Section 6), 24-month construction (Outline CTMP, APP-129) risks safety on narrow roads (e.g., A631, Gainsborough Road). Tillbridge (Section 3.11) flagged traffic cumulative impacts; Steeple's overlap with STEP/Quarry unassessed.

### 6.2.

HGV volumes, rail omission, and PROW disruptions threaten amenity. Request revised Transport Assessment.

## **7. Landscape and Visual Amenity**

### 7.1.

As in RR-035 (Section 7), the ES LVIA (Chapter 6, APP-064) underestimates harms in Trent Vales (NCA 48). Tillbridge's ExA (Section 3.7) gave "great weight" to visual intrusion; Steeple's photomontages (Appendix 6.2, APP-097/098) are optimistic, ignoring 15-year screening delays.

### 7.2.

Cumulative "industrialization" (850,000 panels, 12m infrastructure) affects all PROWs. Request independent LVIA.

## **8. Cultural Heritage**

### 8.1.

As in RR-035 (Section 8), the ES (Chapter 9, APP-067) risks harming assets (e.g., North Leverton Windmill, Grade II\*; Littleborough Church). Tillbridge (Section 3.5) assigned "great weight" to "less than substantial harm"; Steeple's Geophysical Survey (Appendix 9.2, APP-123) lacks local input.

### 8.2.

Construction disturbs archaeology; cumulative with STEP/quarry and other projects utilising same land unassessed. Request enhanced mitigation.

## **9. Air, Noise, and Light**

### 9.1.

As in RR-035 (Section 9), BESS/inverters cause 24/7 noise (Chapter 11, APP-069). Tillbridge (Section 3.8) noted vibration gaps; Steeple's assessment omits night operations.

### 9.2.

Glint/glare (Chapter 16, APP-073) and polarized light risk wildlife. Request acoustic evaluations.

## **10. Conclusion and Recommendations**

10.1.

The Proposed Development fails policy tests (NPS EN-1/EN-3, NPPF, WMS) due to unmitigated harms. We request rejection or redesign.

10.2.

Recommendations: Revised assessments (cumulative, ecology, flood, LVIA); independent reviews; community consultation on mitigations.

On behalf of FFF,

Fields for Farming Community Group