



The Planning Inspectorate

Our ref: XA/2025/100487/01

By email

Your ref: EN010163

SteepleRenewables@planninginspectorate.gov.uk

Date: 25 November 2025

Dear Sir / Madam

EXAMINATION DEADLINE 1: SUMMARY OF INTERESTED PARTY RELEVANT REPRESENTATION.

STEEPLE RENEWABLES PROJECT

We are advised that on 11 June 2025 an application (reference EN010163) for a Development Consent Order (DCO) was accepted by the Planning Inspectorate for examination.

These Relevant Representations contain an overview of the project issues which fall within our remit. They are given without prejudice to any further detailed representations we may make throughout the examination process. We may also have further representations to make when supplementary information becomes available in relation to the project.

We have reviewed the draft DCO, Environmental Statement (ES) and supporting documents submitted to the Planning Inspectorate as part of the above-mentioned application.

Our key issues are identified below.

Summary of the Environment Agency position

1. Flood Risk

Further work is required to demonstrate a full understanding of the following aspects of flood risk:

- Consideration of the flood risk impacts of any structures on site beyond 2069, which is the end of the operational lifetime of the development.
- Further clarity is sought regarding the impacts of, and resilience to, an extreme flood event, arising from a breach in the River Trent defences.
- Further clarity is required regarding the assessment of flood risk from ordinary watercourses.

2. Ecology and Fisheries

- Aquatic habitats and species are not mentioned in the Decommissioning Plan.

3. Groundwater and Contaminated Land

- The Conceptual Site Model (CSM) is inadequate, and not all sources of contamination have been assessed.
- The ground investigation recommendations for the assessment of potential contaminants includes soil testing but should also include groundwater testing.
- Further clarity and consistency throughout all submission documents is required regarding the mitigation measures for unexpected contamination.
- There is a lack of clarity and consistency between documents regarding the firefighting strategy and the need for firewater containment measures.
- There are some outstanding issues regarding the management of surface water drainage, and associated pollution control measures.

4. Water Quality

- Further detail is required in the Outline Construction Environmental Management Plan (oCEMP) to ensure the detailed CEMP(s) adequately mitigate environmental risk.

5. Work Package Tracker

- The Environment Agency tracks its position through the planning process, please see Appendix 2.

Yours sincerely,

[Redacted Signature]

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Appendix 1 – Issues Tracker

Subject	Work package	Scope	Method	Results	Mitigation	Requirement	Tier1 (matter for refusal)/ Tier2 (can be resolved in inquiry)	Notes
Flood risk	Flood Risk Assessment						T2	Further clarity required regarding the impact of extreme flood (breach) events; the assessment of flood risk from ordinary watercourses; and flood risk beyond 2069.
Ecology and Fisheries	Decommissioning Plan						T2	Include aquatic habitats and species in the Decommissioning Plan
Ground water & contaminated land	Conceptual Site Model						T2	Not all sources of contamination have been assessed.
	oCEMP						T2	The assessment of potential ground contaminants should include groundwater testing as well as soil testing.
	Surface Water Drainage Strategy						T2	Further detail required regarding drainage design around BESS
Water Quality	oCEMP						T2	Further details required regarding mitigation measures