

Steeple Renewables Project

Steeple Renewables Project: Written Summaries of Oral
Submissions 11 – 12 November 2025

EN010163/EX/8.4



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1. Introduction

- 1.1. The purpose of this document is to set out the Applicant's written summary of its oral case for Open Floor Hearing 1 (OFH1) and Issue Specific Hearing 1 (ISH1) requested by the Examining Authority in their Rule 8 letter dated 20 November 2025.
- 1.2. This document does not propose to summarise the oral case of parties other than the Applicant. Summaries of the oral case made by other parties are included only where necessary in order to give context to the Applicant's summary.
- 1.3. Where the ExA requested further information from the Applicant on particular matters, or the Applicant undertook to provide further information during the Hearing, the Applicant's response is set out.
- 1.4. This document follows the order of the agenda published by the ExA on the 21 October 2025.

2. Open Floor Hearing 1

- 2.1. A number of parties attended and participated in the OFH1. This summary may not reference all those who took part, but the following are provided acronyms due to extensive interaction during the hearings.

Participants to the Hearings	
CW	██████████ (Resident)
FFF	Fields for Farming (Represented by: Karen Hodgson, Steve Smith, Ruth Edwards, Julie Barlow, Robert Fleming)
JB	Julie Barlow
JBa	James Barlow
NCC	Nottinghamshire County Council, (Represented by: ██████████ (and other colleagues))
NLPC	North Leverton Parish Council
NLWCT	North Leverton Windmill Charity Trust
PW	Peter Warburton
SPC	Sturton Parish Council
RF	Robert Fleming (Resident)

Table 2.2: Written summary of Applicant's oral submission at the OFH1

Interested Party	Submission
Applicant Response to Interested Party Submissions	<p>3 EXA QUESITON(S)</p> <p>3.1. In response to an ExA query re contact with Bassetlaw District Council, the Applicant corrected its position to note that that the last contact had been 3 months not 6 months prior. The Applicant said it expects engagement re. the Local Impact Reports which have been required by the ExA, but that it will continue to try and engage with Bassetlaw District Council.</p> <p>3.2. In response to an ExA question about how members of the public engage with the Applicant, the Applicant directed anyone to the website, [REDACTED] email address was provided on application documents and noted that people could engage with the Applicant at the venue now and on other hearing days.</p> <p>4 QUESTIONS FROM ATTENDEES</p> <p>4.1. In response to question from CW about who at Bassetlaw District Council the Applicant engages with, the Applicant stated that major project manager is [REDACTED].</p> <p>4.2. The Applicant noted that a public liaison consideration would be expected to be put in place as part of the construction stages of the project.</p> <p>4.3. The Applicant noted that on the ecological assessments of hares it will provide further information on this in the responses to relevant representations.</p> <p>4.4. In response to a question from FFF about the potential future expansion of the site, the Applicant noted that there is no proposed expansion of the NSIP.</p>

5. Issue Specific Hearing 1

5.1. A number of parties attended and participated in the ISH1. This summary may not reference all those who took part, but the following are provided acronyms due to extensive interaction during the hearings. The below table also includes commonly used acronyms in the summary.

Applicant / Interest Parties	
BDC	Bassetlaw District Council
CA	Compulsory Acquisition
EA	Environment Agency (Liz Locke, John Bine, Susie Bateson)
ExA	The Examining Authority (as appointed: Max Whiltshire and Andrew Robinson)
CPRE	Campaign for the Protection of Rural England
FFF	Fields for Farming (Represented by: Robert Flemming, Andrew Gibson, Karen Hodgson, Julie Barlow, John Bowler and others)
FSL	Fusion Solutions Limited (Pippa Waterman – observation only)
HE	Historic England (Hayley James)
NGET	National Grid Electricity Transmission (Jonathon Welch (Barrister))
NCC	Nottinghamshire County Council, (Represented by: Steven Pointer, Matt Adams, Jason Morden, Nina Wilson and John Brody)
NLPC	North Leverton Parish Council
NHHM	North Humber to High Marnham Overhead Line Project
NLW	North Leverton Windmill
NLWCT	North Leverton Windmill Charity Trust (James Barlow and Julie Barlow)
SPC	Sturton Parish Council (Richard Appleyard and Lynn Clapperton)
WBSP	West Burton Solar Project (Gareth Phillips)

Table 2.2: Written summary of Applicant's oral submission at the ISH1

ID	Agenda Item	Submission
1. Welcome, introductions, arrangements for the hearing.		
5.2	ExA opened the ISH1 and invited introductions to be made.	
2. Purpose of the issue specific hearing		
5.3	ExA introduced the purpose of ISH1. The Applicant did not make any submissions in relation to this agenda item.	
3. Principle of the proposed development		
3	The Applicant will be asked to describe the principle of the proposed development and its components including considering need for the proposed development.	<p>5.4 The Applicant provided an outline of the principles of proposed development regarding need. The Applicant referred to the respective sections of the NPS EN-1, EN-3 and EN-5 and referred to the respective sections of the ES. The Applicant noted that the contributions it will make to decarbonisation, security of supply and affordability. 3.2.6-3.2.8 EN1 demonstrate the government's urgent need for renewable development. The proposed development will help deliver the Government's objectives. The Development it is covered by the NPS and should be given substantial weight. 3.3.4-3.4.12 sets out additional needs to infrastructure e.g. plans and storage connectors etc. There is a Critical National Priority ('CNP') for the provisions of nationally significant low carbon infrastructure as set out at Paragraph 3.3.62 of NPS EN-1. Underpinning this urgency is paragraph 3.3.63 of NPS EN-1 that confirms Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible. And paragraph 4.1.3 of NPS EN-1 sets out given the level and urgency of need for infrastructure of the types covered by the energy NPSs, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs.</p>
3	The Applicant will be asked to describe the principle of the proposed development and its components including in relation to site selection and the approach to considering alternatives for the proposed development.	<p>5.5 The Application referred ES Chapter 3 APP-061 in relation to site selection. There was a five-stage approach taken considering viable connection, other developments, land size shape and typography. It is worth explaining that in considering land parcels the Applicant considered 3 parcels of 150 acres and then three of these within 5km to make a suitable viable and deliverable site. The Applicant made reference to the Alternative Sites plan [APP-146].</p> <p>5.6 The Applicant stated that site selection is an iterative process and key changes in para 3.6.4 Chapter 3, ES. The Applicant summarised the site selection process by themes. The Applicant explained that progressing from scoping to PEIR stage, sensitivities were identified e.g. Scheduled Ancient</p>

		Monuments were removed from the application site, mitigation areas not identified at scoping were identified and carried forward into the design. Offsets were applied to known constraints e.g. badger sets, ancient trees etc. The Applicant discussed that it had removed proposing infrastructure in the western and eastern area of the site in response to geophysical surveys and to reduce visual impact on the edge of the settlement.
3	The Applicant will be asked to describe the principle of the proposed development and its components including in relation to size.	5.7 The Applicant noted that the Scheme's total area is 888ha. The Applicant discussed its Note on Scheme Efficiency [APP-185] and confirmed that the density of the site is within the 2-4 acres per MW guidelines set by NPS EN3.
3	The Applicant will be asked to describe the principle of the proposed development and its components including in relation to overall generating capacity.	5.8 The Applicant stated that the site has a 600MW overall generation capacity which currently is provisionally split between a 450MW solar array and 150MW BESS.
3	The Applicant will be asked to describe the principle of the proposed development and its components including in relation to grid connection.	5.9 The Applicant confirmed that its Grid Connection Statement [APP-056] sets out the detail of its connection. The Applicant confirmed that it has a connection agreement with National Grid to connect to the West Burton substation in October 2029. The Applicant confirmed that its cable route from the Scheme substation to the National Grid substation comprises circa 700m of 400kV cable. 5.10 In response to queries by the ExA as to the site selection and assessment of alternatives, and whether the Applicant looked for sites to satisfy the 600MW connection point, the Applicant confirmed sites that could accommodate a range of size and scale were searched for. The Applicant explained that there is not a set density for solar farms so that suitable alternative sites could have had a range of area sizes, but a set methodology was used for the identification of alternative sites as set out in Chapter 3 [APP-061]
3	The Applicant will be asked to describe the principle of the proposed development and its components including in relation	5.11 Applicant stated that the Scheme includes a 150MW BESS. The Applicant explained that NPS EN1 outlines the important role of BESS as solar energy does not respond to demand, and therefore BESS is required to respond to grid requirements in times of intermittence.

	to the battery energy storage system.	
3	The Applicant will be asked to describe the principle of the proposed development and its components including in relation to technology.	5.12 Applicant stated that its Note on Scheme Efficiency [APP-185] sets out the types of technology used in designing the scheme. The Applicant confirmed that the Scheme is for a fixed solar array. The Applicant stated that the type of panel is not confirmed as technology will continue to advance and therefore the Applicant will utilise the most appropriate and efficient form of panel on the market at the time of construction.
3	The ExA will give the local host authorities (LHAs), being Bassetlaw District Council (BDC) and Nottinghamshire County Council (NCC), an opportunity to comment on the issues raised throughout this agenda item, followed by any other statutory consultees and interested party (IP).	<p>5.13 In response to a query from NLWTC about the units referred to being a mixture of hectares and acres, the Applicant acknowledges the two types of units being used and offered an explanation as to the reason for the differing units.</p> <p>5.14 In response to a query from FFF about whether the final panel technology selected would be larger in scale, the Applicant clarified that the development is controlled by parameters so the heights cannot go above the Rochdale envelope that is assessed.</p>
4. Relationship with other proposed projects		
4	The ExA will 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, to understand whether there are likely to be any implications for the proposed development.	<p>5.15 The Applicant, in response to a query from the ExA about when the report on the interrelationships would be available, stated that it was being prepared and would be provided at Deadline 1. The Applicant then ran through a summary of the main interactions with STEP, Holcim, Wood Lane, West Burton and NHHM. The Applicant made reference to the submission “Order Limits and Surrounding Projects” [AS-022] and provided a description of the plans in that document.</p> <p>5.16 In relation to the West Burton power station that is being redeveloped by STEP, the Applicant confirmed that it has minimal interaction, with the overlap being limited to the existing access road to the 400kV substation. STEP will be protected via a set of protective provisions and will in turn require its own DCO for consideration.</p> <p>5.17 In relation to Holcim, the adjacent quarry site, the Applicant confirmed that the Scheme is not anticipated to have any impediment to the quarry. The Scheme is proposing to HDD underneath the</p>

		<p>quarry access road, and the Applicant is in the process of engaging with Holcim on a set of protective provisions.</p> <p>5.18 In relation to Wood Lane Solar, the Applicant confirmed that this scheme has been implemented and is now in the control of the landowner. The Applicant did not raise any concerns regarding the interaction of the two projects.</p> <p>5.19 In relation to West Burton Solar, the Applicant confirmed that this is a solar DCO that had been approved on the 24 January 2025. The Applicant confirmed that it had been in ongoing discussions with IGP and a form of cooperation agreement had been discussed since 2024. The Applicant confirmed that since the grant of the West Burton DCO discussions on the cooperation agreement have recommenced. The Applicant clarified that the interaction of the Scheme is in relation to West Burton's buried cable which had been accounted for in the Scheme design. The Applicant confirmed that there may be a construction overlap between the Schemes but that positive engagement is ongoing to manage this interaction.</p> <p>5.20 The Applicant then discussed its interaction with the proposed NHHM project. Applicant stated that NHHM was first made public in early summer of 2023 non-stat consultation was held on 1 June 2023 and 27 July 2023. Referring to AS-22, the Applicant took the ExA through the various stages of consultation carried out by the NHHM Project and the Scheme. The Applicant confirmed that it was not its intention to go into the specifics of the interaction with the NHHM Scheme as further discussion is required with National Grid to understand further the position of the parties. However, the Applicant did note that the indicative route of the NHHM Project would go through a large unbroken area of the Scheme, and therefore there is a pressing need for both parties to be provided fair opportunity to consider material provided by the other, and to see what accommodation can be achieved. The Applicant confirmed that it considers that there is enough of a concern to be making timetable provision for an ISH to deal with the interaction with NHHM in order that a recommendation can be made and decision taken on protective provisions if they are not agreed by the Parties.</p>
4	The ExA would welcome input from National Grid Electricity Transmission Plc and Fusion Solutions Limited on this agenda item noting the comments in their	<p>5.21 In response to the ExA's request for the Applicant's comments in relation to PPs and the management of the site layout, the Applicant stated that it would not typically expect protective provisions to ensure that site layout is fundamentally changed so that it is not clear on the face of the Order what is consented and that protective provisions are much more concerned with construction techniques, micro-siting and detailed design.</p>

	relevant representations ([RR-049] and [RR-046] respectively).	5.22	In response to the ExA's request to clarify how the evolution of an agreement with NGET will be documented, the Applicant responded that updates can be given at each deadline in various forms including the Report on the Interrelationships of other Schemes, or a s127 Report, as well as an update on SoCGs and agreed that an enhanced level of reporting may be helpful to provide clarity on what issues remain and where there is an impasse, in more detail than simply recording that discussions are ongoing.
4	The ExA will then give the LHAs, statutory consultees and IPs an opportunity to comment on the issues raised throughout this agenda item.	5.23	In response to a question posed by NLWTC about loss of land affecting the Applicant's ability to secure land and the possibility that they may then seek to expand the area, the Applicant stated that it had no intention of increasing its boundaries.
		5.24	In response to a question posed by NLWTC in relation to AS-022, about the land shaded pink not having a redline boundary, the Applicant explained that the pink shading represents all of the area that has been under consideration since the start the redline is the point we have fixed on for the application boundary. The Applicant reiterated that whilst there is a process to change red line boundaries, a significant change adding in a considerable area of land would be unlikely to be possible.
		5.25	In response to a question posed by NLWTC about why some areas in the Site Layout don't show panels, the Applicant replied that the area shown with no panels, referenced in this case, was an area excluded due to archaeological constraints.
		5.26	In response to a question from SPS as to why Wood Lane Solar Farm hadn't been incorporated into this application, the Applicant stated it is a separate project with a separate consent capable of being developed independently. The Applicant confirmed they had assessed Wood Lane for cumulative impacts.
5. Landscape and visual			
5	The Applicant and LHAs will be asked questions relating to the effects of the proposed development on landscape and visual matters including the	5.27	Applicant confirmed that the landscape and Visual Impact Assessment (LVIA) APP-68 was prepared in accordance with the overarching principals set out in the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLIVA 3). The methodology for the identification of significant effects was explained in full in Section 6.3 of the LVIA. In summary, an assessment was made as to the level of effect by combining a judgement on the sensitivity of the receptors and the magnitude of

	<p>methodology adopted for assessing significant effects, including rationale for difference with assessing significance for other environmental topics.</p>	<p>the impact. Effects were set out on a 5 point scale from Major to Minor. Effects which were identified to be 'Major', 'Major-Moderate' and in some cases 'Moderate' were identified as being Significant</p> <p>5.28 The Applicant explained how significant and not significant effects have been differentiated where the level of effect is described as "moderate". Applicant confirmed that the moderate is effectively a range between major/moderate and moderate/minor with those effects closer to the major/moderate being considered significant and those closer to moderate/minor being non-significant.</p> <p>5.29 The Applicant responded to the ExA's point on clarity where the scale sits and the thought process behind it, stating that regarding moderate effects it is set out in each case if it is moderate significant, or moderate not significant.</p> <p>5.30 The Applicant responded to the ExA's question about the components of sensitivity (susceptibility and value) and how sensitivity is assessed by stating that the assessment criteria is set out in the LVIA. The example was given that users of a PRoW/residential area would be higher sensitivity compared to users of a trunk road.</p> <p>5.31 Applicant responded to the ExA's question about how viewpoint 20 in APP-098 was identified as a moderate and not a significant effect, stating that the assessment made in the ES were based on winter, the worst-case period. The photomontage takes account of seasonal variation and how the mitigation planting would look in Year 15.</p> <p>5.32 To clarify how the 5 magnitudes of change were dealt with in the ES, the Applicant explained that it is more akin to a scale than 5 specific points but if it sits between the two, the closer point is the one it is identified as.</p> <p>5.33 In response to an ExA query about whether there is a clear table explaining the finding, the Applicant stated that the method used is professional judgement, based on a combination of the narrative text and the overarching assessment criteria.</p> <p>5.34 In response to a question from the ExA about comparing low and medium magnitude, the Applicant stated that the explanation at 6.3.5 gives an indication of the relevant factors applied to reach a conclusion.</p>
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5	The applicant and LHAs will be asked questions relating to the effects of the proposed development on landscape and visual matters including the content of viewpoint photographs [APP-095] and [APP-096] and photomontages [APP-097] and [APP-098], including choice of locations.	<p>5.38 In response to an ExA question as to how the viewpoint selection was finalised, the Applicant stated that the viewpoint photographs included in the LVIA illustrate the views from a series of 26no. representative locations. The viewpoints were photographed in summer 2024. The photomontages illustrate how the Proposed Development would look from a selection of the viewpoints in winter and summer. The photomontages include proposed planting reflecting the summer or winter conditions. Effort was made to agree the locations for the viewpoints and photomontage locations with relevant consultation bodies through the EIA Scoping and PEIR stages, with a request for feedback on the proposed locations included within both the Scoping Report and the PEIR. Very few comments on the viewpoint locations were provided though the EIA Scoping or PEIR stages, with the comments which were received being discussed in Section 6.5 of the LVIA</p> <p>5.39 In response to an ExA question as to how the viewpoints were agreed with other consultees, the Applicant stated that the proposed viewpoints were set out in both the EIA scoping and PIER and the Councils did not request any extras.</p> <p>5.40 In response to an ExA question as to why in APP-096 the views were chosen to show receptors on the Trent Valley Way, the Applicant stated that the LVIA considers the full extent of the Trent Valley Way and how the view changes over its extent. The viewpoints were noted to be an aid to the assessment, but not the sole basis of the assessment.</p>

		<p>5.41 In response to an ExA question about why a viewpoint with views to Sturton-le-Steeple wasn't included, the Applicant stated that as you get closer there is another viewpoint along the route closer to Sturton-le-Steeple, but there wasn't a viewpoint in that particular location. The Applicant noted that it cannot provide a viewpoint for every location, nor should the viewpoints demonstrate the worst-case scenario only. The ultimate point is the overall assessment.</p> <p>5.42 In response to an ExA question as to why viewpoints weren't selected to include the significant effects identified at 6.7.80, the Applicant stated that the assessment of the Trent Valley is in the LVIA itself not the appendix 6.3 and that it confirms any locations where significant effects would arise, whether there are specific viewpoints or not.</p> <p>5.43 In response to a question from JBa/FFF as to the selection of viewpoints, the Applicant clarified that regarding the viewpoint selections the ISH1 has only looked at 2 of the 26 viewpoints at this point in time and that there are a number of the locations covering a selection of nearby, roads, PRoW and residential settlements - they are not the sole judgement - they are an aid.</p>
5	The applicant and LHAs will be asked questions relating to the effects of the proposed development on landscape and visual matters including the conclusions of the landscape and visual assessment, including suitability of proposed mitigation measures in reducing any significant effects.	<p>5.44 In response to an ExA question as to how the landscape affects assessment on landscape features was undertaken and how the landscape features were selected, the Applicant stated that the landscape features consider all as part of the site within the assessment and this was divided within different categories - the woodland, the individual trees, and the hedgerows, and the land cover of the site itself e.g. agricultural or pastoral use and then considered effects on each these elements in the construction period and the operational period.</p> <p>5.45 In response to an ExA question as to what categories are encompassed by land cover, the Applicant stated that if you discount woodland, trees and hedgerows, then land cover is what remains.</p> <p>5.46 In response to an ExA question as to how the beneficial effects on receptors occur in ES paragraphs 7.6.31 and 7.6.32, the Applicant stated that the mitigation planting is far greater in extent than the existing hedgerows to be removed, so the net effect is one that is beneficial.</p> <p>5.47 In response to an ExA question about how the planting referred to in paragraph 6.7.31 would be experienced at Year 1, the Applicant stated that the volume would be notable and already by Year 1 there would be a notable benefit to the landscape.</p> <p>5.48 In response to an ExA question as to why hedgerow planting would have a significant effect, the Applicant stated that it would be at the higher end of moderate in terms of its level of effect.</p>

		<p>5.49 In response to an ExA question as to whether the volume of planting makes it a significant beneficial effect, the Applicant stated that it was a combination of factors including the volume, but also the extent that it would repair existing hedgerow gaps and restore historic pattern. It is all those things together that would add up to that significant effect.</p> <p>5.50 In response to an ExA query as to why ground cover on previously arable land would be beneficial, the Applicant stated that as a landscape farmland is not a species-diverse, so new species rich grassland would be beneficial compared to the arable use.</p> <p>5.51 In response to an ExA question about farmland not being regarded as a high value feature, the Applicant stated that it is commonplace in the landscape and would not be a diverse species-rich feature like that which is being proposed.</p> <p>5.52 In response to an ExA question as to how the species-rich grassland would have an impact when covered by panels, the Applicant stated that the panels do not cover the whole site. They have margins and that grassland grows well under panels and they do not impede its ability to be a landscape feature.</p> <p>5.53 In response to an NCC question as to how the mitigation would be beneficial without proper maintenance or a guaranteed survival rate, the Applicant stated that the oLEMP requires monitoring and management and if there are failures within the first 5 year there are provisions within the LEMP to control this.</p> <p>5.54 In response to a FFF question as to how biodiversity and ecology will be maintained and monitored, the Applicant stated that the LEMP will address this point.</p> <p>5.55 In response to an ExA question as to how there would be a negligible change in Year 1 at Viewpoint 13 of APP-098, the Applicant stated that the 200m distance stated at paragraph 6.7.83 of the ES is an important factor and with the minimal vertical scale the 200m distance can be notable in reducing the effects and the change will be of a lower magnitude given the nature of the landscape.</p> <p>5.56 In response to an ExA query as to why the assessment findings differ between paragraph 6.3.85 and 6.7.180 for the same viewpoint, the Applicant stated that it would not be our intention to do two assessments of magnitude for the same location and we would expect this to be the same. We will review and confirm in writing the assessment finds re. para 6.7.83 and 6.7.108 as ExA thinks different effects have been identified at the same viewpoint. See section below.</p>
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5	The applicant was requested to provide clarification regarding ES paragraphs 6.7.83 and 6.7.108.	<p>5.63 There is no inconsistency between ES paragraphs 6.7.83 and 6.7.108. In short, paragraph 6.7.108 is a collation of paragraphs 6.7.83 and 6.7.84.</p> <p>5.64 Paragraph 6.7.83 is part of the wider discussion of effects on the Trent Valley Way. It states that when the route first reaches Fenton the built elements are over 200m away and the effect would be minor.</p> <p>5.65 Paragraph 6.7.108 is part of the discussion of Fenton Lane (also the route of the Trent Valley Way at this point). Again, it states that at this point of the route the built elements are over 200m away and there is limited potential for effects. It then goes “Further to the east along the route” before providing the assessment of greater effects, for the section the route which is actually adjacent to the built development.</p>

		5.66	This aligns with the same way the assessment changes as the route progresses towards the built development in paragraph 6.7.84, following on from paragraph 6.7.83. The only difference is that paragraph 6.7.108 isn't divided into two paragraphs, in the way that 6.7.83 and 6.7.84 are.
	The applicant and LHAs will be asked questions relating to the effects of the proposed development on landscape and visual matters including the conclusions of the landscape and visual assessment, including the approach to and findings of the cumulative assessment with other projects.	5.67	In response to an ExA query as to why the Applicant does not consider that there will be significant cumulative effects, the Application stated that Chapter 2 of the ES covers the approach to the cumulative assessment. The Zone of Influence (ZOI) for the LVIA was noted to be within a 10km radius. The potential for cumulative effects with other sites in that distance were considered in part through the Zone of Theoretical Visibility (ZTV) coverage of the Proposed Development itself, which is limited when tested in the field. There would be limited intervisibility with the scheme and other sites. The characterisation of the area as housing energy infrastructure was an important part of the baseline as set out in the published Landscape Character Assessment and considered in the judgement.
		5.68	In response to an ExA query as to whether the effect will never be significant if you keep adding to the baseline, the Applicant stated that it thinks it is possible for there to be further significant impacts but in this instance it would not be significant.
		5.69	In response to an ExA question as to whether a sequential cumulative effects assessment had been carried out, the Applicant stated that sequential cumulative effects have been considered along with simultaneous and successive effects. No significant sequential cumulative effects have been identified.
		5.70	In response to an ExA query about sequential views at paragraph 6.10.22, the Applicant stated that there is nothing further written in the LVIA but the process included consideration of the potential for such views. However noting the limited visibility of the proposed development itself from surrounding routes, no significant sequential cumulative effects would arise.
		5.71	In response to an ExA question about the production of any cumulative ZTVs, the Applicant stated that cumulative ZTVs were considered but chose not to utilise them. CZTVs are one tool available but it was considered they would not show an accurate view due to the presence of additional hedgerows and planting which was observed when testing the ZTV of the Proposed Development. They are not the sole basis for judging a development in any case.

		<p>5.72 In response to an ExA question as to whether there were any photo montages including other schemes, the Applicant replied that there were no cumulative montages but in most cases other schemes wouldn't be visible</p> <p>5.73 In response to an FFF/JBa question as to how one scheme encircling the area would not have a cumulative effect, the Applicant stated that the effect that would have is considered in the main body of the assessment and cumulative effects is different and relates to the effects of multiple schemes.</p> <p>5.74 In response to a FFF query as to whether views from Lincolnshire had been considered in the cumulative effects, the Applicant stated that views from Lincolnshire were considered.</p>
6. Historic environment		
6	<p>The applicant, LHAs and Historic England will be asked questions relating to the effects of the proposed development on the historic environment including pre-determination trial trenching for archaeological remains.</p>	<p>5.1 In response to an ExA query about the approach to pre-trial trenching the Applicant stated that a staged approach to below ground archaeology has been adopted, as detailed in the Cultural Heritage Baseline [APP-122] and in line with the assessment in para 2.10.112 to 2.10.119 of NPS EN3 and BDC policy 41 section 6. The consideration of archaeology and its evaluation have included to date:</p> <ul style="list-style-type: none"> (a) Site walkover; (b) Analysis of historic mapping; (c) Analysis of LiDAR data; (d) Analysis of geology and geoarchaeological assessment; (e) Analysis of aerial photographs; (f) Review of archaeological report for previous schemes within the area; (g) Geophysical survey across the entirety of the Order Limits; (h) Trial trench across fixed areas of infrastructure

		<p>5.2 The Appellant has carried out pre-determination trial trenching. Trial trenching carried out has focused on the fixed areas of the scheme around the BESS and the substation – elements of the Scheme which have little flexibility in their position.</p> <p>5.3 Our approach to the archaeological evaluation of the Site was set out in the Scoping Report and has been archaeologically-led – each stage informing the next. This also takes into account the flexible nature of the Scheme – this is not a housing scheme or other large scale power station which requires large scale topsoil stripping or extensive areas of excavation.</p> <p>5.4 The Approach has also been led by the flexibility inherent in the DCO process. A DCO is consented within an envelope so elements within that envelope can be flexible.</p> <p>5.5 Solar, as a technology and development type has far fewer below ground impacts than other types of development and is very flexible in terms of positioning of elements of the scheme. The ability to microsite elements of the Scheme is something noted at NPS EN-3 2.10.137The very low impact of the construction of the solar panel area itself is due to the very narrow profile of the piles and the insertion of these, even over archaeological features such as large ditches and linears, does not prevent future excavation.</p> <p>5.6 As part of the trial trenching, 16 trial trenches were dug with 12 being blank – that is no archaeological features were present. These results aligned with geophysical survey results.</p> <p>5.7 Importantly, the scheme layout has already been influenced by the findings of the archaeological evaluation process. This is in line with NPS EN-3 2.10.116. Four areas of the Site have been excluded from the Scheme and in particular, the area to the south of the Scheduled Monument of the Roman town at Littleborough has been excluded from the area of panels and will be an area of ecological mitigation.</p> <p>5.8 Further archaeological works are proposed as set out in Outline WSI for Post-Consent Archaeological Works APP-126 and the results will continue inform the design and layout of the scheme. The approach is in line with the recently issued consultation draft guidance on Archaeology and Solar Farms: Good Practice Guide (appended). The flexibility of solar is such that anything that is found is mitigatable – this cannot be said for other types of development.</p> <p>5.9 Again, it is noted that we have carried out pre-determination trial trenching.</p>
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		<p>5.10 There are five potential mitigation options available for the siting of panels post-consent as set out in Post-Consent Archaeological Works APP-126. Again, ability to microsite and change locations as per 2.10.137 NPS EN-3 is a requirement of consideration for decision-makers. .</p> <p>5.11 In relation to a question on paragraph 5.9.6 of EN-1 relating to the treatment of non-designated archaeological assets of demonstrably equivalent significance to Scheduled Monuments, we were able to demonstrate that we have already dealt with non-designated assets of potentially equivalent significance with the possible extension of the Roman settlement identified with geophysical survey. This area was removed from the developed area of the Scheme – in the same way, any such deposits identified during trenching post-consent can be dealt with via mitigation.</p> <p>5.12 In response to an HE query on the Applicant’s approach to archaeology in BNG/ecological mitigation areas, the Applicant confirmed that Archaeological Mitigation Strategy APP-124 sets out the approach to be taken. The Applicant also pointed out that these areas are currently under the plough. The Scheme would take these areas out of cultivation for the lifetime of the Scheme, which would be less harmful than the current ploughing regime.</p> <p>5.13 In response to an HE query about whether their piling guidance had been considered, the Applicant noted that the HE guidance is not relevant to the scheme because it deals with tall, multi-storey construction grade piles in urban context. It is not dealing with the type of piling (3mm thick U-shaped profile piles going to a shallow depth to support a solar panel) being used in this scheme.</p> <p>5.14 The Applicant has carried out pre-determination trenching.</p> <p>5.15 The Applicant is committed to a scheme of post-consent archaeological fieldwork, including further trenching with mitigation measures to be deployed as needed. The post-determination strategy is set out in Post-Consent Archaeological Works APP-126.</p> <p>5.16 In response to an HE/NCC query about percentages of site to be trial trenched, the Applicant stated that the NPS does not set out a percentage of trenching or even that trenching is compulsory. requires that trial trenching be proportionate to the sensitivity of and proposed extent of the proposed ground disturbance (2.10.115 NPS EN-1). A move away from a percentage is supported by Mallard Pass (see paragraphs 3.5.50 and 3.3.57 of the ExA’s report). It was made clear that a percentage approach was not appropriate and that a solar scheme would not lead to as much disturbance as other types of development.</p>
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6	The applicant, LHAs and Historic England will be asked questions relating to the effects of the proposed development on the historic environment including the	<p>5.23 In response to an ExA question as to why the impact on NLW is negligible, the Applicant first set out the approach to the assessment of this asset as set out at 6.47 to 6.51 of the Heritage Baseline APP-122 and 9.7.18 of the Heritage ES Chapter APP-057. It was set out that there would be no physical impact to the fabric of this asset arising from the Scheme. As such, any adverse effect would arise from changes to elements of the setting that contribute to its significance. It was then set out that</p>

	assessment of effects and extent of harm to the significance of North Leverton Windmill.	<p>the staged approach as set out within the Historic England GPA3: Setting of Heritage Assets 2017 was utilised which involves identifying and describing the significance of the asset, the setting of the asset which contributes to the significance, whether the Site forms part of the setting and to what extent this contributes. Through this, the Scheme can be assessed.</p> <p>5.24 This assessment identified that the key elements of the significance, the built fabric, would not experience any change. It also identified that the key elements of the setting of the asset would not experience any change – that is, the immediate surrounding yard, mill cottage, the lane to the south or the immediately surrounding agricultural land. A portion of one element, which makes a minor contribution to the asset (the wider agricultural surroundings once historically associated) would experience change as a result of the Scheme.</p> <p>5.25 Because of this, the level of change was considered to be negligible, resulting in a minor adverse effect. This is a temporary effect and would be removed upon the decommissioning of the Scheme.</p> <p>5.26 In response to an ExA question about the relationship between the NLW and the Trent Valley Way, the Applicant stated the Trent Valley Way is modern and is not a heritage asset in its own right – views to and from this PRoW are not a heritage asset and only matter where they contribute to the significance of a heritage asset. The Trent Valley Way has no connection with the NLW and is not a route to or from this asset. The Applicant also noted that guidance is careful to set out that views of a development from, towards or together with a heritage asset are not inherently harmful. The view must contribute to the understanding of the asset and the development must cause a detriment to this relationship for this to matter. In this case, the view of the windmill from the Trent Valley Way is incidental, the windmill was built on the rise to serve its function to capture prevailing winds, not to be seen from the valley floor. The asset is visible from many vantage points. Even where the Scheme may alter views, this would not remove every single view of this asset. It would still be able to be appreciated.</p> <p>5.27 In response to an ExA question about the use of sails as a messaging tool, the Applicant stated that this is an ancillary function. The asset was constructed as a windmill, not for communication and the height of the asset is to enable the more efficient functioning of the asset. The fact it could be used for communication is a factor which does not change the assessment, and regardless, views of the sails would not be entirely obscured by the Scheme – the ability to appreciate the messages sent by the sails would remain intact. .</p>
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7. Flood risk, groundwater and contaminated land		
7	<p>The applicant and Environment Agency will be asked questions relating to the effects of the proposed development on flooding, including Environment Agency concerns in respect of groundwater and contaminated land.</p>	<p>5.1 Applicant stated that the EA comments have been received on this point and their concerns have been understood.</p> <p>5.2 The Applicant noted that ground water contamination associated with West Burton Power Station would be tested for contamination and that it is likely that the soil and surface water would also be tested if leaching identified associated with cable route infrastructure. The disturbance for cable routes would be no greater than a 1m depth.</p> <p>5.3 The Applicant noted that there are numerous records of tanks on and off site, with two in particular in the power station area and the Applicant would investigate these if a risk to the proposed development was identified.</p> <p>5.4 The Applicant expanded on comments made by the EA in relation to PFAS contaminants in their relevant representation and explained that PFAS would be a diffused contamination linked to sewage sludge application permitted for use in agriculture for the purpose of growing food and so is not expected to have a material impact but possible presence of PFAS compounds will be reflected in the updated CSM.</p>

		5.5	The Applicant confirmed that it would continue to engage with the Environment Agency regarding its concerns on contaminated land but considered that all points raised by the Environment Agency are able to be resolved.
8. Land use and agriculture			
8	The applicant will be asked questions relating to the effects of the proposed development on land use and agriculture, including omission of the biodiversity mitigation areas and cable route from the agricultural land classification survey.	5.1	In response to a question from the ExA as to why the BNG area occupied by biodiversity mitigation and cable routes have been omitted from the ag land classification survey, the Applicant noted that it is to deal with written questions on this and so will respond in that setting.
		5.2	The Applicant noted that the BNG enhancement areas were excluded from ALC surveys as generally nothing in those areas will physically affect the soils, so there is no prospect of the land quality being affected. NE have focused on small areas of proposed ponds (shown on plans 3 and 6 of APP-160) and the soil and land quality of these small areas would be investigated post-DCO and pre-construction. An extra section has been added to the oSMP to cover this and the soil will be stored and can be put back at landowner request at decommissioning. The Applicant will be consulting NE on the changes to the oSMP.
		5.3	The Applicant clarified that the cable route has since been refined and is only about 1km long, and the ALC surveys would be carried out post-DCO but before cable installation, as agreed with NE. Intention is for no permanent degradation or loss of agricultural land.
		5.4	The Applicant noted NE comments made in relevant representations regarding the requirement for ALC surveys over areas of proposed woodland. The Applicant confirmed that this doesn't seem to be necessary as the trees will be retained and there will be no permanent impact on the soil, and the areas involved are small, but they would not resist such surveys post-DCO and pre-planting.
		5.5	The Applicant stated that land loss is a different consideration to the loss of use of land for arable purposes. Land loss is very limited, the scheme is fully reversible and APP-072 notes no permanent loss even in the areas of the BESS. Only 12.1 ha of BMV and 13.2ha of all arable land is temporarily affected during the operational stage.
		5.6	In respect of the loss of use of land for arable farming, and the effects on food production, Government (eg Solar Roadmap) identifies biodiversity loss and climate change as the greatest threats to food production land. The Tillbridge Solar DCO decision gave arable land loss neutral weight (para 4.28) and recent agricultural land use figures stated that 444,000ha is in agricultural

		<p>environmental schemes compared to only 100,000ha of arable land needed for solar. This demonstrates that the focus of government efforts is not in relation to food production. (Agricultural Land Use in England at 1 June 2025, Defra, 25 September 2025). The land will still be available for food production by the grazing of sheep.</p> <p>5.7 The Applicant noted that, as set out in Chapter 3 of the ES, there is poor information on the location of BMV. The maps reflect that the majority of the site is in an area where there is limited or low likelihood of BMV and therefore there is not the ability for the Applicant to accurately assess areas of BMV prior to getting onto site and carrying out surveys which takes time and cost.</p>
9. Review of issues and actions arising		
5.8	ExA will publish the action points as soon as they can after the hearing.	
5.9	FFF raised a procedural question as to whether land use, BMV and socioeconomic impact will be considered orally or only in written submissions. ExA stated that they cannot promise anything at this stage and will consider timetabling and need for other hearings.	
10. Any other business		
5.10	The Applicant did not raise any AOBs.	
11. Closure of the hearing.		
5.11	ExA closed the hearing.	