

Steeple Renewables Project

Statement of Common Ground between Applicant and Lincolnshire County Council

January 2026

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Prepared By	The Steeple Renewables Project Consultant Team	
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Table of Contents:

1	Introduction.....	3
2	Current Position.....	4
3	Appendix A1 - Record of Engagement.....	7
4	Appendix A2 – Signing Sheet.....	8

Table of Contents:

Table 1 – Matters Engaged in this SoCG	4
Table 2 – Current position of matters relevant to the parties’ discussions.....	5

1 Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground ('SoCG') has been prepared to support the Examination of the Development Consent Order ('DCO') application for the Steeple Renewables Project (the 'Proposed Development').
- 1.1.2 The SoCG has been prepared jointly by Steeple Solar Farm Limited (the 'Applicant') and Lincolnshire County Council ('LCC') to clarify the current position of the relative parties on specific matters that are, or have been, under discussion. It seeks to confirm to the Examining Authority ('ExA') where there are points of agreement between the parties and where agreement has not been reached to date. It therefore aids the ExA in identifying any specific issues that may need to be addressed during the Examination and provides a structure to any further discussions for the parties engaged in the SoCG.
- 1.1.3 This document has been prepared in response to a specific request from the ExA as per the Rule 6 Letter Issued 10th October 2025.

1.2 Terminology

- 1.2.1 Section 2 of this document sets out the relevant matters raised through discussion between the parties. It provides a summary of the position of each party and identifies the status of discussion on each matter:
- "Agreed" means that a matter has been resolved between the parties and is not anticipated to be subject to further discussion:
 - "Under discussion" means that a matter remains in active dialogue between the parties and a final position has not been reached:
 - "Not Agreed" means that the parties have established a final position that they cannot resolve the matter and will remain a point of difference.
- 1.2.2 In accordance with the request from the ExA in the Rule 6 Letter, a Low, Medium and High 'traffic light' (also known as a RAG system) is applied to each matter to indicate the likelihood of their resolution during the Examination period.

1.3 Status of this document

- 1.3.1 This document is currently at draft stage. Matters engage are summarised in Table 1.

Table 1 – Matters engaged in this SoCG

Waste Disposal	Waste Hierarchy and Recycling

2 Current Position

- 2.1.1 Table 2 on the next page provides a summary of the current position of the Applicant and LCC in relation to specific matters that have been under discussion to date.
- 2.1.2 Where a matter is not represented in the table, it should be assumed that it is either: (i) agreed between the parties and has never required detailed discussion; or (ii) not relevant to the discussion between the parties.
- 2.1.3 Appendix A of this document provides a record of engagement undertaken between the parties in relation to the Proposed Development. This is limited to engagement which is materially relevant to the contents of this SoCG and does not seek to include every correspondence between the parties (e.g. that which was primarily administrative).

Table 2 – Current position of matters relevant to the parties' discussions

Row ID	Topic	Applicants Position	LCC's Position	Status
LCC 1	Waste disposal.	<p>Waste is included and assessed as a section within ES Chapter 17: Miscellaneous Issues [APP-074] from all phases of development (construction, operation and decommissioning) and the potential for cumulative effects. No significant effects are anticipated regarding waste. Furthermore, waste management is outlined during construction through ES Appendix 4.1 Outline Construction Environmental Management Plan (oCEMP) [APP-089], operation through ES Appendix 4.4 Outline Operation Environmental Management Plan (oOEMP) [APP-092] and decommissioning through ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090].</p> <p>Requirements 7 (CEMP), 9 (OEMP) and 21 (Decommissioning and Restoration) of the draft DCO [APP-042] secure more detailed plans for each phase of development.</p> <p>Following the receipt of Examining Authority's Written Questions 1 (ExQ1) [PD-005] (Q12.0.7) further information as requested by the ExA is to be prepared regarding an assessment of local and regional landfill capacity at Deadline 3.</p>	<p>STATUS: Under discussion</p> <p>As a general comment, LCC would wish to see forecasts of waste arisings by type at each phase of the project, along with what the developer intends to do with them, particularly if anything may need to be sent to destinations in Lincolnshire. Specifically for the three project stages:</p> <p>Construction waste: Within Chapter 17 (Miscellaneous Issues) (APP-074) there is reference to 'minimal' waste, but with little detail to substantiate this statement. The oCEMP does not provide any further information in this regard. Ultimately, the developer needs to forecast waste arisings and what they intend to do with the waste. This should include some reference to PV panels and expected failures during commissioning.</p> <p>Operational waste: Chapter 17 (APP-074) suggests that there will be 'substantially less [waste] than that of the construction phase' and that the waste hierarchy will be followed, including for PV panels.</p>	Under Discussion

			<p>Table 3.14 of the oOMP (APP-092) references a Site Waste and Materials Management Plan (SWMMP) that will be an appendix to the CEMP, and implies that these will be construction waste forecasts. LCC would like to see the same information supplied for every phase, and thus the SWMMP should be referenced for the oCEMP, oOMP and the oDP/DWMS (see below).</p> <p>For the Operational phase, are the PV panel and other equipment expected to last the full lifetime of the project? If not, what is their anticipated replacement schedule?</p> <p>A forecast of anticipated waste arisings, intended management of those arisings, with reference to an estimated annual failure rate for the PV panels, should be provided (acknowledging that this could be a significant quantity over the lifetime of the development).</p> <p>Decommissioning waste: LCC recognise the applicant's reference to multiple waste streams and following the waste hierarchy (ES Chapter 17 (APP-074), including their hope (at 17.5.64 and following paras) that, whilst cumulative arisings alongside other developments "could create pressure on the</p>	
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			<p>capacity of local recycling plants or landfill sites”, that the “new industry ...emerging for the recycling of solar panels, and the re-sale of any operational panels” will resolve this. Whilst the oDP (APP—090) promises a DWMS (Strategy), there is little detail provided. Again, there needs to be a forecast of how much waste is anticipated, what they intend to do with it, particularly in light of the current lack of recycling capacity and the cumulative arisings across multiple projects in the region.</p> <p>Additional comments 22/12/25</p> <p>LCC welcomes that the applicant will be providing more information on waste arisings and impacts at Deadline 3. Our previous comments still apply with regard to the content we would like to see in that assessment, including that it should cover the construction, operational and decommissioning phases of the project.</p>	
LCC 2	Waste – Hierarchy and recycling	<p>The Waste Section of ES Chapter 17: Miscellaneous Issues [APP-074] details how the Proposed Development is designed, constructed and to be operated under the 'Waste Hierarchy' guidance and abide by the principles of sustainable waste management.</p>	<p>STATUS – Agreed</p> <p>Overall, LCC are encouraged to see repeated references to the waste hierarchy, including specifically to reuse and recycling. We would welcome further clarity on the quantity and</p>	Agreed

		<p>Waste management (waste hierarchy and recycling) is also outlined during construction through ES Appendix 4.1 Outline Construction Environmental Management Plan (oCEMP) [APP-089], operation through ES Appendix 4.4 Outline Operation Environmental Management Plan (oOEMP) [APP-092] and decommissioning through ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090].</p> <p>Requirements 7 (CEMP), 9 (OEMP) and 21 (Decommissioning and Restoration) of the draft DCO [APP-042] secure more detailed plans for each phase of development.</p>	<p>proposed fate of each waste type to put this into practice.</p> <p>With reference to the draft DCO (APP-041) (NB not APP-42) it is welcome that the DCO secures the production of a CEMP, OEMP & DP in consultation with the local planning authority. However, it would be helpful for LCC to be consulted on any of those documents, either directly or via the LPA, where there is a realistic prospect that any waste arisings may be sent into the LCC area.</p>	
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A1 Record of Engagement

Date	Method of Engagement	Purpose/Description/Description
20/01/2025	Email	S42 Notification
15/07/2025	Email	S56 Notification
11/11/2025	Email	SoCG issued to Lincolnshire County Council for comment
25/11/2025	Email from Lincolnshire County Council	Date of comments on SoCG to be provided
25/11/2025	Email	Accepting the amended date of return
27/11/2025	Email from Lincolnshire County Council	Comments on SoCG provided attached to email.
28/11/2025	Email	Requested SoCG is returned in word format
02/12/2025	Email from Lincolnshire County Council	Comments on SoCG returned in word format
18/12/2025	Email	Revision 2 of SoCG issued via attachment to email
22/12/2025	Email from Lincolnshire County Council	Comments on SoCG revision 2 returned via attachment to email in word format
19/01/2026	Email	SoCG Rev 2 returned to Lincolnshire County Council for signing
20/01/2026	Email from Lincolnshire County Council	SoCG Rev 2 returned signed from Lincolnshire County Council via attachment to email

A2 Signing Sheet

Duly signed and authorised on behalf of
Steeple Solar Farm Limited (the 'Applicant')

Name:	[REDACTED]
Job Title:	DCO Lead Developer
Date:	21/01/2026
Signature:	[REDACTED]

Duly signed and authorised on behalf of
Lincolnshire County Council

Name:	[REDACTED]
Job Title:	Head of Planning
Date:	20/01/2026
Signature:	[REDACTED]