

# Steeple Renewables Project

## Statement of Common Ground between Applicant and Natural England

January 2026

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## **Statement of Common Ground between Applicant and Natural England**

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<b>Prepared By</b>	The Steeple Renewables Project Consultant Team	
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## **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 Natural England ('NE') 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 10<sup>th</sup> 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 engaged are summarised in Table 1.

**Table 1 – Matters engaged in this SoCG**

BMW Agricultural Land	Ecology	All SSSI	Shadow Habitat Regulation Assessment	Biodiversity Net Gain	Protected species licences
Yellow	Green	Green	Green	Green	Yellow

## **2 Current Position**

2.1.1 Table 2 on the next page provides a summary of the current position of the Applicant and NE 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	NE's Position	Status
NE 1	BMV Agricultural Land	<p><b>ES Chapter 15: Land Use and Agriculture [APP-072B]</b> has had regard to agricultural land quality and identified the grade of land within the Order Limits. <b>ES Appendix 15.1 Agricultural Land Classification Report [APP-131]</b> provides more detail of the land classification within the Order Limits and <b>ES Appendix 15.2 Outline Soil Management Plan [APP-132]</b> details how soil within the Order Limits will be managed for the lifetime of the Proposed Development.</p> <p>Approximately 72.1% of the land within the Order Limits forms BMV land.</p> <p>The site will remain in agriculture as it will be grazed.</p> <p><b>ES Appendix 4.1 Outline Construction Environmental Management Plan [APP-089]</b>, <b>ES Appendix 4.4 Outline Operational Environmental Management Plan [APP-092]</b> and <b>ES Appendix 4.2 Outline Decommissioning Plan [APP-090]</b> detail phases of development and impact to BMV agricultural land.</p> <p>A revised outline Soil Management Plan was issued to Natural England on 12/01/2026 for comment (prior to submission at Deadline 3) to include the cable corridor (in this case about 1km) and the</p>	<p>Natural England have reviewed the additional information provided (12/01/2026), and have remaining concerns regarding one item:</p> <ul style="list-style-type: none"> <li>- NE12 – ALC Survey Methodology – Absence of ALC Survey across the full order limits.</li> </ul> <p>Previous concerns raised with regard to the below items have either been addressed and agreed, or NE consider them unlikely to make a material difference to our advice or the outcome of the decision-making process:</p> <ul style="list-style-type: none"> <li>- NE13 – Development Design and Avoidance of Best &amp; Most Versatile (BMV) Land – Limited consideration of avoidance of BMV land.</li> <li>- NE14 - ALC Survey Results and Data Presentation – Recommendation for presentation of the areas, and amounts of BMV land, used for temporary construction works (e.g. construction compounds).</li> <li>- NE17 – Soil Management – Recommendation to include Natural England as a consultee on the final Soil Management Plan.</li> <li>- NE18 – Soil Reinstatement – Recommendation for clearer commitment to restoration of all land disturbed during construction to be reinstated to its original ALC grade.</li> </ul>	<p>Under Discussion</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed</p>

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		<p>environmental enhancement areas, as well as a few other amendments, which are listed at the start of the document.</p> <p>A further BMV Note document has also been provided to Natural England on 12/01/2026 (prior to submission at Deadline 3) regarding the micro-siting points under amber for NE13. Requirement 7 (CEMP), 9 (OEMP), 11(SMP) and 21 (Decommissioning and Restoration Plan) of the <b>dDCO [REP2-007]</b> secure further details of each plan.</p>	<ul style="list-style-type: none"><li>- NE19 – Soil Monitoring and Research – Recommendation for additional soil monitoring and research through the project.</li></ul> <p>For further detail please see our most recent Risk and Issues Log, which will also be submitted for D3.</p>	Agreed
NE 2	Ecology	<p><b>ES Chapter 7: Ecology &amp; Biodiversity [APP-065]</b> includes an assessment of the Proposed Development's impact on ecological receptors supported by extensive survey work to confirm the designated sites, and the habitats and species, that are likely to be affected by the Proposed Development.</p> <p>The Proposed Development will minimise impacts on protected species and habitats in line with national policy. Appropriate Ecological habitat will be provided during operation of the Proposed Development impact for relevant species through mitigation, compensation and enhancement.</p> <p><b>A Skylark Mitigation Strategy is presented in ES Appendix 7.13 [APP-115]</b>, which shows further details and the locations of the measures at the Site.</p> <p>Buildings and trees with bat and barn owl suitability will be retained, thereby avoiding direct impacts upon potential bat roosts.</p>	<p>NE note that this topic is extremely broad and includes matters we have not reviewed. As such, we cannot agree nor disagree. All items relevant to NE's remit have been captured in other topics within this document.</p>	Agreed

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		<p>Where possible existing field boundary hedgerows will be retained and enhanced. Whilst the loss of some vegetation will be required, this loss will be kept to a minimum and is outweighed by proposed additional planting and mitigation measures.</p> <p>Existing hedgerows, trees and woodland to be retained will be buffered from the development and habitat diversity will be managed as set out in the <b>ES Appendix 7.12 outline Landscape and Ecological Mitigation Plan (oLEMP) [APP-116]</b>. Widths of the buffers vary according to the value of trees and hedgerows, possible bat roosts etc.</p> <p>Requirement 6 (LEMP) of the <b>dDCO [REP2-007]</b> secure further LEMP details including 10% BNG. Requirement 7 (CEMP) of the <b>dDCO [REP2-007]</b> secures additional ecological details including pre-construction surveys for protected species and a habitat constraints plan.</p>		
NE 3	All SSSIs	<p>An assessment of the potential impacts of the Proposed Development on relevant nationally designated statutory sites (including Clarborough Tunnel) and the need for further mitigation is included in <b>ES Chapter 7: Ecology &amp; Biodiversity [APP-065]</b>. Due to the nature of the Proposed Development and the separating distance from any areas of development within the Site, no direct or indirect impacts on the interest of Clarborough Tunnel SSSI are anticipated. No mitigation towards Clarborough Tunnel SSSI is necessary.</p> <p>Clarborough Tunnel SSSI has also been considered within the Construction Dust Risk Assessment in <b>ES Appendix 14.1(C) - Air Quality Appendices [APP-130]</b>. This SSSI is classified as a medium</p>	<p>Natural England concur that impacts to any SSSIs during construction, operation and decommissioning are unlikely. Further detailed comments are provided at NE7-NE9 of our Relevant Representations (RR-054).</p>	Agreed.

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		<p>sensitivity receptor to dust but when combined with distance from the source of dust emission is defined as having a low area sensitivity, in line with IAQM guidance.</p> <p>Nevertheless, the Applicant has committed to producing a Dust Management Plan when detailed construction information is available, as secured within <b>ES Appendix 4.1 outline Construction Environmental Management Plan [APP-189]</b> and requirement 7 of the <b>dDCO [REP2-007]</b>. This will detail how to practically implement the mitigation measures proposed, including monitoring, during construction when dust emissions are most likely to be generated by the Proposed Development.</p>		
NE 4	Shadow Habitat Regulation Assessment (sHRA)	<p>The <b>Information to Inform Habitats Regulation Assessment (sHRA) [APP-180]</b> concludes the Proposed Development is not likely to have a significant effect on any of the following designated sites either alone or in-combination:</p> <ul style="list-style-type: none"><li>• Birklands and Bilhaugh SAC.</li><li>• Hatfield Moor SAC.</li><li>• Humber Estuary SPA.</li><li>• Humber Estuary Ramsar.</li><li>• Humber Estuary SAC.</li><li>• Thorne and Hatfield Moors SPA; and,</li></ul>	<p>NE concur with the conclusion of the sHRA. Further detailed comments are provided at NE1-NE6 of our Relevant Representations (<a href="#">RR-054</a>).</p>	Agreed

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		<ul style="list-style-type: none"><li>• Thorne Moor SAC.</li></ul> <p>There is no requirement to progress to Stage 2 of the appropriate assessment process (the test of 'adverse effect on integrity').</p>		
NE 5	Biodiversity Net Gain	<p><b>Section 5 and 6 of the Planning Statement [APP-182]</b> set out the Environment Act 2021 will make it mandatory for NSIPs to deliver 10% BNG, but this is not yet applicable for NSIPs.</p> <p><b>ES Appendix 7.12 Biodiversity Net Gain Report [APP-114]</b> sets out the results of the Proposed Development's BNG assessment and concludes an overall net gain of 10%.</p> <p>Requirement 6 (LEMP) of the <b>dDCO [REP2-007]</b> sets out how a minimum of 10% biodiversity net gain will be achieved.</p>	<p>It should be noted that Natural England have not reviewed the Biodiversity Metric in detail. Nonetheless, Natural England welcome the commitment to deliver a minimum of 10% BNG, in line with the intended mandate due to come in to force May 2026 (Biodiversity net gain for nationally significant infrastructure projects).</p> <p>Natural England continue to encourage the applicant to secure gains in excess of the minimum 10%, as demonstrated within the Biodiversity Metric Calculations.</p>	Agreed
NE 6	Protected species licences	<p>The need for protected species licences is considered within <b>ES Chapter 7: Ecology and Biodiversity [APP-065]</b>. The outcome is that licences for bats and great crested newts are not likely to be required. A badger development licence is likely to be required for temporary impacts to a small number of setts.</p> <p>Table 1 part 7 of the <b>Consents and Agreement Position Statement [APP-181]</b> confirms the Applicant proposes to submit a draft badger licence application to Natural England. The draft licence application will assess the realistic worst-case impacts to badgers and their setts to identify the activities that may require licence and agree appropriate</p>	<p>Natural England welcome the intention for a draft licence application to be submitted, but are yet to receive the application, as set out at NE11 (RR-054).</p>	Under Discussion

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	<p>mitigation so that Natural England may issue a Letter of No Impediment regarding protected species licencing.</p> <p>The Applicant spoke with NE on 21 November 2025 to clarify the intended timescale for a draft license application to be submitted to NE.</p> <p>The Applicant confirmed the intent is to submit the draft application before the end of January 2026. NE advised that it would normally take around 30 working days to issue the Letter of No Impediment (LoNI). Therefore, the Applicant considers that it will be able to provide the LoNI before close of examination.</p>		
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## **A1 Record of Engagement**

<b>Date</b>	<b>Method of Engagement</b>	<b>Purpose/Description/Description</b>
20/01/2025	Email	S42 Notification
15/07/2025	Email	S56 Notification
11/11/2025	Email	Draft SoCG emailed to Natural England
21/11/2025	Email from Natural England	Comments on SoCG provided
12/01/2026	Email	Revised outline Soil Management Plan and BMV note emailed for comment
13/01/2026	Email	Rev 2 SoCG emailed to Natural England via email attachment
16/01/2026	Email from Natural England	Comments on Rev 2 SoCG provided via email attachment
19/01/2026	Email	Clean SoCG Rev2 issued for signing
21/01/2026	Email from Natural England	Signed SoCG Rev 2 provided 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:	22/01/2026
Signature:	[REDACTED]

Duly signed and authorised on behalf of  
Natural England

Name:	[REDACTED]
Job Title:	Senior Sustainable Development Officer – East Midlands Area Team
Date:	21/01/2026
Signature:	[REDACTED]