POWER FOR GOOD

Steeple Renewables Project

Statement of Common Ground between Applicant and the Environment Agency

January 2026

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Infrastructure Planning (Applications: Prescribed Forms and Procedure)

Statement of Common Ground between Applicant and the Environment Agency

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Prepared By	The Steeple Renewables Project Consultant Team	
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Version	**Date**	**Version Status**
Examination	January 2026	Rev 2

Table of Contents:

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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 the Environment Agency ('EA') 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.

Ecology	Species Survey - Lamprey	Fish Mitigation	Non-invasive Species	Biodiversity Net Gain	Culverts	Decommissioning and Fish	Otter Mitigation	Flood Risk – Sequential Test	Flood Risk - Assessment of flood risk beyond 2069	Flood Risk – Site Shut Down Process	Flood Risk – Site recoverability following breach flood event

Flood Risk Modelling	Surface Water Drainage	Consents Strategy	BESS Drainage Strategy and Fire water management	Foul Water Drainage	Ground Water Protection – Impact of Heat	Channel Capacity and Water Crossing	Water Usage	Water Framework Directive	Waste	Soil Management	Draft Development Consent Order

2 Current Position

2.1.1 Table 2 on the next page provides a summary of the current position of the Applicant and EA 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	EA's Position	EA Relevant Rep Ref.	Status
EA 1	Ecology	**ES Chapter 7: Ecology & Biodiversity [APP-065]** 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, which are likely to be affected by the Proposed Development. 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. 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 **ES Appendix 7.12 outline Landscape and Ecological Mitigation Plan [APP-116]**. Widths of the buffers vary according to the value of trees and hedgerows, possible bat roosts etc.			Agreed
EA 2	Species Survey – River Lamprey and Sea Lamprey	River lamprey and sea lamprey were listed in the Humber Estuary SAC designation in **ES Appendix 7.2: Designated Sites [APP-104]** baseline report.	Satisfied. Matter can be closed	N/A	Agreed

		The potential for impacts to arise on lamprey species is assessed in section 5 of the **Report to Inform Habitats Regulations Assessment [APP-180]** No impact pathway has been identified to the SAC or to lamprey specifically, and therefore specific mitigation measures are not proposed.			
EA 3	Fish Mitigation	Direct impacts to watercourse and wet ditch habitats have been avoided in most cases. No new culverts will be installed on watercourses that are likely to support fish. Where required across suitable watercourse, crossings will be clear-span bridges. Suitable mitigation for fish is provided on page 27 and Page 28 of **ES Appendix 4.1 - Outline Construction Environmental Management Plan [APP-089]**. This includes timing of works to avoid key spawning and migration periods where possible and fish rescue and relocation to take place, supervised by an Ecological Clerk of Works ('ECoW') secured by Requirement 7 of the **draft DCO [APP-041].**	Satisfied. Matter can be closed	N/A	Agreed
EA 4	Invasive Non Native Species	Paragraph 7.2.59 of **ES Chapter 7: Ecology & Biodiversity [APP-065]** confirms during the onsite field surveys; Canadian waterweed was observed within Mother Drain in the east of the Site. No other Invasive Non-Native Species (INNS) have been noted within the Order Limit to date.	Satisfied. Matter can be closed.	N/A	Agreed

		Appendix 4 Table 7.9 on page 151 of **ES Chapter 7: Ecology & Biodiversity [APP-065]** confirms an INNS Management Plan will be provided post-consent. The following **dDCO [APP-41]** requirements will secure commitment to INNS management and monitoring: • Requirement 7 (CEMP) – part (1) of the requirement specifies that the CEMP must be in accordance with the **outline CEMP [APP-089]**, which includes INNS control measures in Table 3.3. • Requirement 6 (LEMP) – part (1) of the requirement specifies that the LEMP must be in accordance with the **outline LEMP [APP-166]**, which includes INNS monitoring and actions in Table 14. • Requirement 21 (Decommissioning Plan) - part (2) of the requirement specifies that the Decommissioning Plan must be in accordance with the **outline Decommissioning Plan [APP-090]**, which includes measures relating to invasive species in Table 3.1.			
EA 5	Biodiversity Net Gain	**Section 5 and 6 of the Planning Statement [APP-182]** set out the Environment Act 2021 will make it mandatory for NSIPs to deliver 10% BNG, but this is not yet applicable for NSIPs. **ES Appendix 7.12 Biodiversity Net Gain Report [APP-114]** sets out the results of the Proposed Development's BNG assessment and concludes an overall net gain of 10%.	Satisfied. Matter can be closed	EF3	Agreed

		Requirement 6 (LEMP) of the **draft DCO [APP-041]** sets out how a minimum of 10% biodiversity net gain will be achieved.			
EA 6	Culverts	New culverting of watercourses suitable for fish is not proposed, and any access crossings will be clear span to avoid these impacts. This is included in the ES **Chapter 7: Ecology & Biodiversity [APP-065]**. The proposed culverts on seasonally wet ditches will not impact on fish as the ditches are considered unsuitable for fish based on being seasonally wet only with shallow water (ca. 5cm). Existing culvert crossings on watercourse DD8 may need to be removed to enable the installation of a new clear-span bridge (subject to the detailed design). If works in a waterway that is suitable for eels is needed, fish rescue measures and eel screens on over-pumping equipment would be used. Suitable mitigation for fish (including eels) is provided on page 27 and Page 28 of **ES Appendix 4.1 - Outline Construction Environmental Management Plan [APP-089]**. This includes timing of works to avoid key spawning and migration periods where possible and fish rescue and relocation to take place, supervised by an Ecological Clerk of Works ('ECoW'). Details will be provided in the final CEMP secured by Requirement 7 of the **draft DCO [APP-041].**	Satisfied. Matter can be closed.	N/A	Agreed
EA 7	Impacts of the decommissioning	It is recognised that standard measures will be needed to guard against incidental pollution of watercourses, and these have been described in	Satisfied. Await updated oDP at Deadline 3 before this matter can be closed.	EF1	Under Discussion

	phase on waterways and fish	the **ES Appendix 4.2 Outline Decommissioning Plan [APP-090]** secured by Requirement 21 of the **draft DCO [APP-041]** All culverts that were created/replaced or ponds that were enhanced/created during construction will be left in situ. Therefore, no specific measures above the measures relating to the water resource – such as pollution prevention and run-off control – are specifically required for aquatic habitat. The Applicant doesn't anticipate any change at watercourse crossings during decommissioning. The **Outline Decommissioning Plan (oDP) [APP-090]** will be updated at Deadline 3 to cover this.			
EA 8	Otter mitigation	Mitigation information for preventing mammals from becoming entrapped in temporary excavations is provided in **ES Appendix 4.1 - Outline Construction Environmental Management Plan [APP-089]** secured by Requirement 7 of the **draft DCO [APP-041].** The otter section in the **Outline Construction Environmental Management Plan [APP-089]** will be updated at Deadline 3 regarding excavations.	Satisfied. Await updated Outline CEMP at Deadline 3 before this matter can be closed.	EF5	Under Discussion
EA 9	Flood Risk – Sequential Test	A summary of flood risk from all sources is contained within **ES Chapter 8 – Hydrology, Hydrogeology, Flood Risk and Drainage [APP-066] Flood Risk Assessment [APP-178]** and **Flood Risk Sequential Assessment and Exception Test [APP-186 to APP-189]** that confirm the Site is at risk from both fluvial (low-medium) and surface water (very low-medium) flooding sources. However, mitigation measures have been proposed to ensure the Proposed Development will be safe	Satisfied. Matter can be closed	N/A	Agreed

		without increasing flood risk elsewhere. Whilst alternative sites may perform better in terms of flood risk (fluvial sources), no alternative site is without some flood risk, when all sources are considered. However, the DCO site is more sequentially preferable in wider sustainable development terms, as it is not affected by heritage constraints, habitat, ecology, and landscape constraints to the same degree as the alternative sites assessed are. Therefore, as there are no available sequentially preferable sites that are of sufficient size to accommodate the whole Proposed Development, the Proposed Development satisfies the Sequential Test.			
EA 9.1	Flood Risk – Assessment of flood risk beyond 2069	The **Flood Risk Assessment [APP-117 to 119 and APP – 178]** was updated (paragraph 5.2.9) at Deadline 2 to state that the grid connection date is October 2029 and the 40 year design life is specified as Requirement 21 of the draft DCO **(dDCO) [APP-041].** The 40 year operational period is triggered at the grid connection date, therefore there is no flexibility to extend the operational lifetime beyond 2069 and no need to stipulate this as an end date within the DCO. With regard to the decommissioning phase, paragraph 8.1.4 of the **Flood Risk Assessment [APP-117 to 119 and APP – 178]** was updated at Deadline 2 to explain that approximately 10% of the site falls within the design flood extent during the decommissioning phase, and the only infrastructure present in this design flood extent will be solar panels and invertors, with negligible associated floodwater displacement. The amended Flood Risk Assessment also explains that	Satisfied. Regarding 40-year design life to 2069. Matter can be closed. Under discussion regarding decommissioning phase. A simple calculation (xm^3 lost within an overall floodplain of ym^3) should be provided to support the assertion that floodplain impact will be negligible.	FR01 & FR02	Under Discussion

		the decommissioning works will take place over a 12 month period at the very start of the 2080s epoch, therefore consideration of a 39% climate change allowance, which considers a 55 year period from 2070, is highly conservative.			
EA 9.2	Flood Risk- Site Shutdown Process	The **Flood Risk Assessment [APP-117 to 119 and APP – 178]** was updated (paragraph 7.3.2 and 7.3.3) at Deadline 2 to state that Flood Risk Management for the operational phase is covered in **ES Appendix 4.4 outline Operational Environmental Management Plan (oOEMP) [APP-092]** and for the construction / decommissioning phases is covered in **ES Appendix 4.1 outline Construction Environmental Management Plan (oCEMP) [APP-089]** and **ES Appendix 4.3 outline Decommissioning Plan (oDP) [APP-090].** Detailed versions of these plans are secured via Requirement 7, 9 and 21 of the **draft DCO (dDCO) [APP-041].** No further detail regarding the shutdown process is to be submitted at this stage.	Satisfied. Matter can be closed.	FR03	Agreed
EA 9.3	Flood Risk – Site recoverability following breach flood event	The **Flood Risk Assessment [APP-117 to 119 and APP – 178]** was updated (paragraph 7.2.5) at Deadline 2 to note that in the event of flooding, all electrical connections beyond the rack terminations will no longer be live until the flood has subsided. Given the ingress protection (IP) rating of the modules within the BESS enclosure, and the IP rating of the enclosure itself, a short circuit in the event of a flood is unlikely. The Applicant accepts that any equipment damaged during a breach flood event may need to be repaired or replaced, this is a commercial	Working on a solution. We recognise that a breach scenario would not normally be considered as the "design event", however, given the criticality of the BESS, has any consideration been given to bunding the BESS to provide additional resilience in the event of a breach or can the BESS be	FR04	Under Discussion

		risk and there is no risk to life as the site will be unmanned during this event.	designed so that any damage in the event of a breach is minimalised?		
EA 9.4	Flood Risk - Modelling	Appendix G (Hydraulic Assessment of Ordinary Watercourses) of the **Flood Risk Assessment [APP-117 to 119 and APP – 178]** was updated at Deadline 2, together with paragraph 5.2.20 of the Flood Risk Assessment, to discuss the findings of the updated modelling work undertaken by the Applicant. The updated modelling included the addition of structures on the Catchwater Drain into the model and sensitivity testing as requested by the Environment Agency. The updates to the Flood Risk Assessment and the Hydraulic Assessment of Ordinary Watercourses explain that the updated modelling shows that the risk of fluvial flooding to proposed infrastructure from the modelled watercourses (Catchwater Drain, Mother Drain and New Ings Drain) is low.	To be confirmed pending review of hydraulic assessment [REP2-018]	FR05 & FR06	Under discussion
EA 10	Surface Water Drainage	A Surface Water Drainage Strategy is proposed for the Proposed Development in **ES Chapter 8 – Hydrology, Hydrogeology, Flood Risk and Drainage [APP-066]** and **ES Appendix 8.2 Surface Water Drainage Strategy [APP-120]** detailing appropriate use of a Sustainable Drainage System on site. Whilst not required to make the development acceptable, two large detention basins have been strategically placed within the Site on land to the west (up-gradient) of Sturton-le-Steeple. Their locations and sizes have been carefully designed to intercept overland flows, with	Satisfied. This matter can be closed.		Agreed

		water held in the basins before being released at a controlled rate to the existing drainage ditches after the peak of the rainfall event. The two basins combined would provide an attenuation capacity of approximately 4300m3 to help reduce the flooding issue reported by the residents. As it is a grassland area infiltration and evapotranspiration are likely to occur. Requirement 16 (surface and foul water drainage) of the **draft DCO [APP-041]** secures additional surface water drainage details.			
EA 10.1	Consents Strategy	Table 1 of the **Consents and Agreements Position Statements [APP-181]** sets out at ref three if water discharge activities are required then an application for water discharge activity environmental permit will be made by the contractor before water is discharged. This position is also made clear in Part 4 Article 15 of the **draft DCO** submitted at Deadline 2 **[REP2-007]**.	Satisfied. This matter can be closed.	GWCL4	Agreed
EA 10.2	Consents Strategy	Article 15 of the draft DCO submitted at Deadline 2 **[APP-041]** does not operate to replace the consenting procedure operated by the Environmental Permitting (England and Wales) Regulation 2016. Article 15(7) sets this out specifically, stating that the article does not override the controls set out by regulation 12 of the aforementioned regulations. The consents discussed within the article, as per 15(3) are consents obtained from the owner of the water course, sewer, or drain. In this way, the Applicant does not consider that the example raised by the EA of regulation 12 regime to be a relevant example. It should be noted	Satisfied. This matter can be closed..		Agreed

		that the 28-day period, provided in Article 15(9) of the dDCO, has been used in many DCOs, and in particular, to reference recent examples, has been used in: Byers Gill Solar Order 2025, Five Estuaries Offshore Wind Farm Order 2025, Mona Offshore Wind Farm Order 2025, M5 Junction 10 Development Consent Order 2025.			
EA 10.3	BESS Drainage Strategy and Fire water management	**ES Appendix 4.3 Outline Fire Risk Management Plan,** relevant text has been updated throughout the document to reflect a commitment to accommodating the use of water for firefighting purposes. The Outline Fire Risk Management Layout Plan in Appendix C of the document has been updated to show the drainage basin and penstock valve. **ES Appendix 8.2 Surface Water Drainage Strategy [APP-120]**, paragraphs 5.3.12 and 5.3.13 were added and Table 8.2 (paragraph 8.2.2) was updated at Deadline 2 to detail a typical schedule of maintenance activities for the granular stone material to be installed at the BESS compound. Table 8.4 (paragraph 8.2.4) was updated to include a typical schedule of maintenance activities for the automatic shutdown valve to be installed at the BESS downstream manhole.	Satisfied with the wording in Outline Fire Risk Management Plan [REP2-030] however Appendix C Layout Plan is not available to view. Satisfied with revisions to Surface Water Drainage Strategy [REP2-034], This part of the matter can be closed.	GWCL5, GWCL6, GWCL7	Agreed pending review of Layout Plan
EA 10.4	Foul Water Drainage	Table 3.4 of the **Outline Construction Environmental Management Plan [APP-089]** sets out during construction foul water from any Site compound (including temporary toilets) will be taken away by tanker to an appropriate disposal facility by a licensed waste disposal contractor.	**Foul Water Management –** **We await review of updated Outline Construction Environmental Management Plan.** We would like to see additional detail. Expand wording of oCEMP to include a new section 'Foul water management' to	WQ	Under discussion

		The **Outline Construction Environmental Management Plan [APP-089]** will be updated at Deadline 3 and include a new section on Foul Water Management.	ensure the detailed CEMPs include details of estimated effluent volumes, storage capacity, tankering arrangements, and contingency measures in the event of service disruption.		
EA 11	Surface Water Protection	Measures employed to mitigate impacts related to surface water during both the construction, operation and decommissioning phases of the Proposed Development are set out in **ES Appendix 4.1 outline Construction Environmental Management Plan (oCEMP) [APP-089]**, **ES Appendix 4.4 outline Operational Management Plan (oOEMP) [APP-092]** and ES **Appendix 4.2 outline Decommissioning Plan (oDP) [APP-090]**. Considering embedded and additional mitigation measures the residual significance of the effect of the construction, operational, maintenance and decommissioning phases of the Proposed Development risks of accidental pollution incidents affecting water quality of surface water and groundwater bodies are minimised to an acceptable level. A targeted ground investigation is proposed to identify any areas of ground contamination requiring remediation to protect groundwater. The **Outline Construction Environmental Management Plan [APP-089]** will be updated at Deadline 3 and include temporary construction	**We await review of updated Outline Construction Environmental Management Plan.** **Temporary Construction Drainage Strategy** The CEMP should include a detailed drainage strategy covering infrastructure layout, runoff management, particularly during heavy rainfall, and treatment methods for discharges to controlled waters. **Water Management Plan** Amend wording of oCEMP 'General' to ensure the Water Management Plan specifies monitoring parameters, sampling locations, sampling frequency, and consider the use of real-time sensors for continuous monitoring in high activity areas. Include post-construction monitoring to assess long-term impacts on watercourses.	WQ	Under Discussion

		drainage strategy, amended wording regarding water management plan and expanded wording of spillage risk. Requirement 7 (CEMP), 9 (OEMP) and 21 (Decommissioning/ Restoration) of the **draft DCO [APP-041]** secure further details of each plan.	**Pollution Incident and Emergency Response Plan** Expand wording of oCEMP 'Spillage Risk' to ensure the Emergency Response Plan outlines spill response procedures, staff responsibilities, training, spill kit locations, and the process for notifying relevant authorities.		
EA 11.1	Contaminated Land and Groundwater Protection	A targeted ground investigation is proposed to identify any areas of ground contamination requiring remediation to protect groundwater.	Satisfied. This matter can be closed.	GWCL3	Agreed
EA 11.2	Contaminated Land and Groundwater Protection	The amended Phase 1 Geoenvironmental desk study report, Rev. 3, Section 5.1 now includes clear references to the need to undertake groundwater and potentially affected nearby surface waters sampling and analysis where the ground investigation reveals evidence of mobile or leachable significant contaminants that could affect the development or which the development could interfere with or mobilise during construction.	[REP2-023] is to be reviewed and response provided by Deadline 4.	GWCL2	Under Discussion
EA 11.3	Contaminated Land Conceptual Site Model and	The amended Phase 1 Geoenvironmental desk study report, Rev. 3, Section 4.2 and Appendix E have both been modified to include reference to potential diffuse source contaminants present in the farmland from the application of sewage sludge. The buried of two	[REP2-023] is to be reviewed and response provided by Deadline 4.	GWCL1	Under discussion

	associated risks to groundwater	buried oil pipelines (their presence was unknown in the first report) is also now included as a potential linear source, with the location of these services included in Appendix A. The CSM is also updated and expanded to include: separate assessment of contaminants risks in the 99% greenfield (farmland) and the 1 % brownfield (farm yards and buildings and power station) areas of the site. The risk of significant contaminant exposure in the brownfield areas is now deemed to be moderate to construction workers and low to moderate to end users/maintenance workers. The statements relating to historical tanks have been clarified and reference to them as potential sources of hydrocarbon contaminants for the proposed development in the Power Station area is included in the updated CSM.	Previous comment: We are not satisfied that that the Phase 1 Geoenvironmental Desk Study Report uses all relevant information in the data search, and that the CSM is appropriate for the risks identified. The potential for soil and groundwater contamination associated with West Burton Power Station cannot be ruled out without further investigation. Based on the evidence presented, we consider this to be at least a Moderate risk (currently given as Low). Remediation or mitigation may be required. Numerous records of historical tanks both on- and off-site are noted in the Groundsure reports. These are not mentioned in the desk study. Some of these could be sources of contamination and should be in the CSM.		
EA 11.4	Groundwater Protection – impact of heat	The Applicant acknowledges heat can be a groundwater pollutant, and this could be caused by thermal transmission from high voltage (HV) underground cables. The Applicant confirms no sensitive abstractions or protected habitats have been identified that could be affected by this impact. **ES Chapter 8: Hydrology, Hydrogeology, Flood Risk and Drainage [APP-066]** assesses the impacts of heating of groundwater	Satisfied. This matter can be closed.		Agreed

		from HV cables. The assessment determines the residual effects are not significant.			
EA 12	Channel Capacity and water crossing	Channel capacity and water crossings is considered in **ES Chapter 8 – Hydrology, Hydrogeology, Flood Risk and Drainage [APP-066]**. There is the potential for a reduction in channel capacity due to creation of new crossings or culverts. However, as part of the Proposed Development, existing watercourse crossings have been used where possible. Any new bridges / culverts will be designed to ensure flow capacity is retained and access to watercourse for maintenance is maintained.	Satisfied. This matter can be closed.		Agreed
EA 13	Water Usage	Section 8.7 of **ES Chapter 8: Hydrology, Hydrogeology, Flood Risk and Drainage [APP-066]** details water usage and identifies options for water sources for all stages of the Proposed Development. A Pre-Planning Assessment Report (dated 06.05.25) from Anglian Water ('AW') confirms the availability of up to 20m3 per day via an existing main on Gainsborough Road. Exceptionally, should demand exceed this rate, water would be sourced via rainwater harvesting, mobile bowser from off-site sources or surface water abstraction (adhering to any limits set by the relevant discharge consents). No significant effect is anticipated on local water reserves or existing abstractions.	Satisfied. This matter can be closed.		Agreed
EA 14	Water Framework Directive	**ES Appendix 8.3 Water Framework Directive Assessment [APP-121]** concludes that the Proposed Development does not present a risk of deterioration of status of WFD waterbodies or jeopardise the attainment of 'good' overall status of WFD waterbodies.	Satisfied. This matter can be closed.		Agreed

EA 15	Waste	**ES Chapter 17 (Miscellaneous Issues) [APP-074]**, **Planning Statement [APP-182]**, **ES Appendix 4.1 Outline Construction Environmental Management Plan (oCEMP) [APP-089]**, **ES Appendix 4.4 Outline Operational Environmental Management Plan (oOEMP) [APP-092]** and **ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090]** have considered waste from all phases of development (construction, operation and decommissioning) and the potential for cumulative effects has been considered. Specifically, **ES Appenidx 4.1 Outline Construction and Environmental Management Plan (oCEMP) [APP-089]** and **ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090]** details of how waste will be managed in accordance with the waste management hierarchy. Requirements 7 (CEMP), 9 (OEMP), and 21 (Decommissioning and Restoration) of the **draft DCO [APP-041]** secure additional waste management details through all phases of development.	Satisfied. This matter can be closed.		Agreed
EA 16	Soil Management	Table 3.7 of **ES Appendix 4.1 Outline Construction Environmental Management Plan (oCEMP) [APP-089]** sets out further measures to mitigate effects on agricultural land during construction, including soil storage methodology is set out in **ES Appendix 15.2 Outline Soil Management Plan (oSMP) [APP-132]**. A Soil Management Plan ('SMP') is secured by Requirement 11 of the draft DCO and as a component of the detailed CEMP(s) (Requirement 7 of the **draft DCO [APP-141]**). These will include specific soil resource surveys, Site inspections by a suitably experienced soil scientist and the use of appropriate plant for soil handling and reduction of ground pressure.	Satisfied. This matter can be closed.		Agreed

		During decommissioning a Soil Management Plan ('SMP') will be prepared (if required) in accordance with **ES Appendix 15.2 oSMP [APP-090]**, setting out measures to manage the reinstatement of any soils and minimising soil disturbance and soil compaction when extracting the solar PV panels' supporting infrastructure. Requirement 21 (Decommissioning and Restoration) of the **draft DCO [APP-041]** secures additional details at decommissioning stage.			
EA 17	Draft Development Consent Order (DCO)	The **draft DCO [REP2-007]** provides the principal powers to enable the construction, maintenance and decommissioning of the authorised development. Schedule 2 of the dDCO includes requirements which control these functions. Requirements 3 (Detailed design approval), 7 (CEMP), 9 (OEMP), 16 (surface and foul water drainage) and 21 (Decommissioning and Restoration) of the **draft DCO [REP2-007]** secure additional details through all phases of development.	Consultation on discharge of Requirements: The Environment Agency requests inclusion as a named consultee on: • Requirement 9 Operational environmental management plan • Requirement 10 Fire risk management plan • Requirement 16 Surface and foul water drainage • Requirement 21 Decommissioning and restoration		Under discussion

A1 Record of Engagement

Date	Method of Engagement	Purpose/Description
17/04/2024	Email from the Environment Agency	Introductory email from the Environment Agency
24/05/2025	Email from the Environment Agency	Follow up email from the Environment Agency outlining costs for pre-application advice.
17/07/2024	Meeting	Meeting with the Environment Agency to discuss flood risk in relation to the Proposed Development.
20/01/2025	Email to the Environment Agency	S42 Notification
29/01/2025	Email from the Environment Agency	Email requesting extension on time to respond to the PEIR
29/01/2025	Email to the Environment Agency	Email confirming extension on time to respond to the PEIR
30/01/2025	Email from the Environment Agency	Email confirming response deadline for comments on the PEIR.
30/01/2025	Email to the Environment Agency	Email confirming response deadline for comments on the PEIR.
10/03/2025	Email from the Environment Agency	Statutory consultation response
15/07/2025	Email	S56 Notification
24/07/2025	Email from the Environment Agency	Confirmation of the change of EA lead for the Proposed Development.
11/11/2025	Email	SoCG issued to the Environment Agency via attachment to email
17/11/2025	Email from the Environment Agency	Point of Contact
17/11/2025	Email	Return email on point of contact
20/11/2025	Emil from the Environment Agency	Comments on the SoCG attached to email. Meeting offered.
21/11/2025	Email	Regarding meeting offer
24/11/2025	Email from the Environment Agency	Regarding meeting offer
10/12/2025	Email	Meeting dates and times offered to the Environment Agency (received an out of office at incident automatic email reply)
15/12/2025	Email	Meeting dates
16/12/2025	Email from the Environment Agency	Meeting dates and times (confirmed for 18/12/2025)
18/12/2025	Meeting	Discuss matters further under discussion in the SoCG

13/01/2026	Email	Rev 2 SoCG issued to the Environment Agency via attachment to email
15/01/2026	Email	Requesting EA attend the arrange MS Team meeting
19/01/2026	Email	Chasing comments on Rev 2 SoCG
19/01/2026	Email from Environment Agency	Apologised for missing the MS Team meeting previous week and confirmed comments on Rev 2 SoCG would be provided 20/01/2026
20/01/2026	Email from Environment Agency	Comments on Rev 2 SoCG provided via attachment to email
20/01/2026	Email	Requesting signed copy of the Rev 2 SoCG
21/01/2026	Email from Environment Agency	Signed copy of the Rev 2 SoCG 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

the Environment Agency

Name:	[redacted]
Job Title:	Planning Specialist
Date:	21.01.2026
Signature:	[redacted]