

# Steeple Renewables Project

## Statement of Common Ground between Applicant and National Highways

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## Statement of Common Ground between Applicant and National Highways

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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 National Highways ('NH') 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 engage are summarised in Table 1.

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

| Draft Development Consent Order | Transport Impacts on Local Communities | Strategic Road Network | Abnormal Loads |
|---------------------------------|--|------------------------|----------------|
|                                 |  |                        |                |

## 2 Current Position

- 2.1.1 Table 2 on the next page provides a summary of the current position of the Applicant and NH 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**

| ID Row | Topic                                  | Applicants Position  | NH’s Position  | Status        |
|--------|--|--|--|---------------|
| NH 1   | Draft Development Consent Order (DCO). | <p>There is no freehold acquisition sought in the <b>dDCO [REP3-005]</b>. The remaining powers sought are in relation to the acquisition of new rights and/or temporary possession which is proportionate and necessary to facilitate the Proposed Development.</p> <p>The <b>dDCO [REP3-005]</b> is based on legal precedent and includes the appropriate structure, scope, provisions, requirements and protective provisions.</p>   | National Highways letter dated 25 November 2025 (Our Ref: NH/24/06203) to be referred. In the letter, we note that access to the site is not proposed directly onto the SRN. As such, Section 175(b) of the Highways Act 1980 (as inserted by The Infrastructure Act 2015) is not relevant. As such it is agreed that there are no compulsory acquisition issues.  | <b>Agreed</b> |
| NH 2   | Transport impacts on local communities | <p><b>ES Appendix 13.2 outline Construction Traffic Management Plan (oCTMP) [APP-129]</b> includes measures to manage construction vehicle access and routing to the order limits. This includes traffic routing avoiding Sturton-le-Steeple village and routing for abnormal loads to ensure access roads are suitable for transportation of components to the site.</p> <p>Section 5 pages 18 to 23 of the <b>oCTMP [APP-129]</b> covers anticipated construction traffic flow during AM and PM peak hours in the month when the maximum construction traffic volume is expected.</p> <p>Requirement 8 (CTMP) of the <b>dDCO [REP3-005]</b> secures further construction traffic management details.</p> | National Highways letter dated 25 November 2025 (Our Ref: NH/24/06203) to be referred. In the letter, we have acknowledged that a Construction Traffic Management Plan (CTMP) will be implemented and National Highways should be consulted. The CTMP should cover the anticipated construction traffic flow during AM and PM peak hours in the month when the maximum construction traffic volume is expected. This is now agreed with the applicant under the relevant highway authority named within Requirement 8 (CTMP) of the <b>dDCO [REP3-005]</b> . | <b>Agreed</b> |

|      |                        |  |  |                  |
|------|------------------------|--|--|------------------|
|      |                        | The Applicant can confirm that National Highways are a consultee under the relevant highway authority named within Requirement 8 (CTMP) of the <b>dDCO [REP3-005]</b> .  |  |                  |
| NH 3 | Strategic road network | <p><b>ES Chapter 13: Transport and Access [APP-071]</b> has assessed the impact of the Proposed Development within a defined area. The Strategic Road Network 'SRN' is not located in the local vicinity of the site and scoped out of the assessment. However, the SRN (Junction 34 A1(M)) is included on the delivery and staff restricted routing, and therefore traffic impact on this SRN at this junction is assessed within <b>ES Appendix 13.1 Transport Assessment (TA) [APP-128]</b>.</p> <p>Safe and appropriate access arrangements are provided for the construction and operational phases of development, and that the trips associated with the development are considered not to have a significant impact on the strategic highway network, which will be ensured through the application of the <b>oCTMP [APP-129]</b>, secured by requirement 8 of the <b>dDCO [REP3-005]</b> which includes appropriate mitigation specific for the scheme.</p> <p>The Applicant does not consider it necessary to undertake a junction capacity assessment at Blythe Interchange (Junction 34 A1(M)) as construction vehicular traffic movements can be scheduled outside any peak hours such as AM and PM peaks, an approach set out in the <b>oCTMP [APP-129]</b> and as part of mitigation measures as part of Requirement 8 of the <b>dDCO [REP3-005]</b>.</p> | <p>National Highways letter dated 25 November 2025 (Our Ref: NH/24/06203) to be referred. In the letter, we have recommended junction capacity assessment of Blythe Interchange for the Month 7 (peak delivery month) scenario shall be provided.</p> <p>The submitted oCTMP states deliveries will be scheduled outside of the network peak hours which is welcomed. However, the impact on Blythe interchange during the 8-9 AM and 17-18 peaks is 64 two-way movements, which is double the NH threshold of 30 vehicles used as a proxy for assessment as set out in NH's November letter. There appears to be a contradiction between what is said in the SoCG, that deliveries will be scheduled outside of AM/PM peaks and that provided in previous submissions.</p> <p>NH has requested further evidence to justify capacity analysis at Blythe Interchange (Junction 34 A1(M)).</p> | Under discussion |

|  |   |  |  |
|--|---|--|--|
|  | <p>During an MS Teams meeting with National Highways on the 10<sup>th</sup> February 2026, NH requested additional justification to explain the Applicant's position regarding not providing a junction capacity assessment at Blythe Interchange (Junction 34 A1(M)). The requested justification is set out below:</p> <ul style="list-style-type: none"><li>• Pre-DCO submission discussions with NH confirmed that there was no existing capacity issues at Blythe Interchange (Junction 34 A1(M)), and therefore traffic count data was not requested.</li><li>• The routing strategy was discussed and agreed with NH prior to DCO-submission (vehicle height/weight restrictions on alternative routes in local road network determined the proposed route) using A1(M) J34 for all site related traffic.</li><li>• A1(M) J34 was proposed for the Bumble Bee BESS and Solar site, and the West Burton Power Station site, with no capacity assessment required.</li><li>• The construction period is 24 months and therefore is temporary with Month 7 being the 'peak' time of construction deliveries, therefore management of delivery vehicle impact, rather than proposing highway works mitigation (which in itself could cause traffic disruption) is considered to be more suitable in this instance.</li><li>• There is no suitable WebTRIS data available for the junction including the mainline or the slip roads. In addition to this, with accelerated deadlines of the DCO submission, the Applicant was</li></ul> |  |  |
|--|---|--|--|

|  |  |   |  |  |
|--|--|---|--|--|
|  |  | <p>unable to undertake traffic surveys prior to submission. However as previously indicated, based on pre-application discussions, it was understood that additional traffic surveys were not requested for Blythe Interchange (Junction 34 A1(M)).</p> <ul style="list-style-type: none"> <li>The <b>Transport Assessment [APP-128]</b> outlines the traffic impact associated with the Proposed Development, including the impact at Blythe Interchange (Junction 34 A1(M)) set out in paragraphs 8.15-8.18 for Month 7. This provided a theoretical "Worst Case" peak traffic flows as an example of the peak month and a peak hour. The trips would be temporary due to the construction period timescales with management and monitoring in place as outlined in the <b>oCTMP [APP-129]</b>.</li> <li>The planning portal for developments within the local area were reviewed and no suitable baseline traffic information was available.</li> <li>NH have confirmed that the daily trips associated with the proposed development and set out in the ES do not trigger further assessment. On this basis it is therefore considered that with appropriate management of restricting deliveries during the AM and PM peak where possible, that the traffic impact at this time is also acceptable.</li> </ul> |  |  |
|--|--|---|--|--|

|      |                 |   |   |                      |
|------|-----------------|---|---|----------------------|
|      |                 | Discussions are ongoing with NH to confirm if further information to support the Applicant's justification provided above is required or whether the position is now agreed.  |   |                      |
| NH 4 | Abnormal loads. | <p>Appropriate applications and notifications, in accordance with <b>ES Appendix 13.2 outline Construction Traffic Management Plan (oCTMP) [APP-129]</b> and part 5 Table 1 of the <b>Consents and Agreements Position Statement [REP1-006]</b>, will be made by the contractor in advance of the delivery of abnormal load. This includes Department for Transport, National Highways, Nottinghamshire County Council Highway Authority or the police and bridge owners (if any) as appropriate.</p> <p>The Applicant will engage with National Highways in the normal way and at the relevant time with respect of Abnormal Loads and to establish an effective movement strategy for delivering ALLs as required with a feasibility study to be undertaken as is required.</p> <p>As required in the <b>Consents and Agreements Positions Statement [REP1-006]</b> at Section 5, Table 1, row 5, appropriate applications and notifications, in accordance with the <b>oCTMP [APP-129]</b> will be made by the relevant contractor in advance of the delivery of abnormal loads.</p> | <p>National Highways letter dated 25 November 2025 (Our Ref: NH/24/06203) to be referred. In the letter, we have acknowledged that a construction contractor has not yet been appointed, the proposed routing for deliveries is therefore unknown at this stage. We encourage the Applicant to engage with National Highways as soon as possible to establish an effective movement strategy when the information of routing dimensions and frequencies of ALLs are available.</p> <p>Based on the information set out in the <b>Consents and Agreements Positions Statement [REP1-006]</b> at Section 5, Table 1, row 5, appropriate applications and notifications, in accordance with the <b>oCTMP [APP-129]</b> will be made to NH by the relevant contractor in advance of the delivery of abnormal loads.</p> | <p><b>Agreed</b></p> |

## A1 Record of Engagement

| Date                           | Method of Engagement   | Purpose/Description  |
|--------------------------------|--|--|
| 20/01/2025<br>to<br>03/03/2025 | Statutory Consultation - Technical meetings with specialists and/or correspondence via email | The Applicant engaged with National Highways over road uses. National Highways confirmed use of A1(M) Junction 34 would be acceptable in principle during the construction period. |
| 20.01.2025                     | Email  | S42 Notification   |
| 17.10.2025                     | Email  | Email with post submission technical note attached.  |
| 11.11.2025                     | Email  | Draft SoCG issued to National Highways via attachment to email   |
| 03.12.2025                     | Email  | Chasing comments on draft SoCG   |
| 09.12.2025                     | Email  | Chasing comments on draft SoCG   |
| 10.12.2025                     | Email from National Highways   | Confirming SoCG comments will be provided 19.12.2025   |
| 18.12.2025                     | Email from National Highways   | Draft SoCG returned via email with comments from National Highways   |
| 23.12.2025                     | Email from National Highways   | Revised comments on draft SoCG returned via email with comments from National Highways   |
| 24.12.2025                     | Email  | Email clarifying National Highway comments and position in the SoCG  |
| 12.01.2026                     | Email  | Chasing National Highways to clarify their position and comments on the draft SoCG   |
| 13.01.2026                     | Email from National Highways   | Revised comments on draft SoCG returned via email with comments from National Highways   |
| 13.01.2026                     | Email  | Revised draft SoCG (Rev 3) issued to National Highways via attachment to email updating Applicants position  |
| 16.01.2026                     | Email from National Highways   | Confirming no further comments on SoCG and requested a copy for signing  |
| 16.01.2026                     | Email  | SoCG (Rev 3) issued to National Highways via attachment to email ready for signing   |
| 19.01.2026                     | Email from National Highway  | Signed SoCG (Rev 3) returned from National Highways via attachment to email  |
| 30.01.2026                     | Email  | Chasing updates on the SoCG  |
| 06.02.2026                     | Email  | Chasing updates on the SoCG  |
| 09.02.2026                     | Email from National Highways   | Requesting an MS Team meeting that was agreed for the following day  |

**Statement of Common Ground between Applicant and  
National Highways  
Steeple Renewables Project**

[www.steeplerenewablesproject.co.uk](http://www.steeplerenewablesproject.co.uk)

|            |                              |   |
|------------|------------------------------|---|
| 10.02.2026 | MS Team Meeting              | Discussed the three principle matters. NH2 NH indicated allowing to agree subject to confirmation they are a named consultee for Requirement 8 (CTMP) in the dDCO. NH3 NH requested additional information from the Applicant to justify position regarding a junction capacity assessment at Blythe Interchange (Junction 34 A1(M)).NH4 NH verbally confirmed this principal matter can be agreed. |
| 12.02.2026 | Email                        | Rev 4 SoCG issued via attachment to email to National Highways  |
| 16.02.2026 | Email from National Highways | Comments in track changes provided in Rev 4 SoCG  |
| 16.02.2026 | Email                        | Clean version of Rev 4 (draft) SoCG issued for signing  |
| 18.02.2026 | Email from National Highways | Signed Rev 4 (draft) SoCG returned via attachment to email  |

## A2 Signing Sheet

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

|            |   |
|------------|---|
| Name:      | Will Bridges  |
| Job Title: | DCO Lead Developer  |
| Date:      | 18 <sup>th</sup> February 2026  |
| Signature: |  |

Duly signed and authorised on behalf of  
National Highways

|            |   |
|------------|---|
| Name:      |  |
| Job Title: | Spatial Planner   |
| Date:      | 18 <sup>th</sup> February 2026  |
| Signature: |  |