



POWER
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Steeple Renewables Project

Statement of Common Ground between Applicant and
Lincolnshire County Council

~~January-February~~ 2026

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Statement of Common Ground between Applicant and Lincolnshire County Council

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Version History		
Version	Date	Version Status
Examination	January 2026	Rev 2
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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 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~~ at completed stage. Matters engage are summarised in Table 1.

Table 1 - Matters engaged in this SoCG

Waste Disposal	Waste Hierarchy and Recycling

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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-089REP3-011], operation through ES Appendix 4.4 Outline Operation Environmental Management Plan (oOEMP) [APP-092REP3-015] and decommissioning through ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090REP3-013]. Requirements 7 (CEMP), 9 (OEMP) and 21 (Decommissioning and Restoration) of the draft DCO [APP-042REP3-005] 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<u>Agreed</u></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>	<p>Under Discussion <u>Agreed</u></p>

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		<p><u>At Deadline 3 the Applicant provided a Local and Regional Landfill Capacity Assessment [REP3-038] that covered all phases of development (Construction, Operation and Decommissioning).</u></p> <p><u>This document established two study areas, local (Proposed Development Study Area) and Regional (East Midlands for non-hazardous and inert waste management). Hazardous waste is managed at national level and therefore the study area for hazardous waste is England.</u></p> <p><u>A waste recovery rate of 70% is assumed to be achievable for construction, operation and decommissioning for the purpose of this assessment. This is in line with national target for recovery of construction and demolition (C&D) waste of 70% by weight, as set out in the revised Waste Framework Directive (2025) and the Waste Management Plan for England. IEMA Guidance outlines that a good practice landfill diversion target of 90% has been achieved and exceeded by major UK developments. In 2020, the most recent year for which data is available, the UK generated 59.4 million tonnes of non-hazardous C&D waste, of which 55 million tonnes was recovered representing a recovery rate of 92.6%. The applicant is committed to reuse and recycling as much waste as possible.</u></p>	<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><u>In conclusion the assessment shows that under realistic worst case (with 70% recovery) cumulative impacts would not be significant (below 1%). Absolute worst case assessment (assuming zero recycling/ recovery, would not be realistic due to commitments and regulatory controls) cumulative impacts would not be significant (below 1%). For an effect on hazardous landfill capacity to cross the threshold of significance is 0.1% of national capacity (9,750m3). Assuming the hazardous waste fraction of waste solar panels sent to hazardous waste landfill a significant effect would occur if the hazardous waste fraction represents 12.17% of the solar panel mass. The majority of solar panel components are, however, non-hazardous waste – approximately 76-76% glass, 10-11% plastic, 8-13% aluminium frame and 1% copper wiring and other metals. This equates to 99% of solar panel components classified as non-hazardous waste and 1% considered hazardous waste. 1% of the solar pV waste is 1,186.76 m3 below 9,750 m3 (the 0.1% hazardous landfill capacity threshold). For a significant effect to occur 8.2% of solar panel mass would have to be classified as hazardous waste and sent to hazardous waste landfill for disposal, which is not the case.</u></p> <p><u>The assessment also provided examples of existing companies who are able to recycle waste from solar and BESS developments including “Recycle Solar” based in</u></p>	<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 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> <p>Additional comments 06/02/2026 <u>We note that the Applicant’s Local and Regional Landfill Capacity Assessment [REP3-038] includes reference to landfill capacity in Lincolnshire as part of the totals for the East Midlands region. Whilst it may be too early in the project to identify specific destinations for waste, please note that our</u></p>	
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		<p><u>Scunthorpe, North Lincolnshire, and “SECONDSOL” that provides a marketplace service to purchase and sell second hand PV panels and equipment.</u></p> <p><u>Batteries, as things stand, in accordance with WEEE Regulations 202533 and the Waste Batteries and Accumulators Regulations 2009 will likely be undertaken by the battery manufacturer or supplier for recycling into new batteries or reuse.</u></p> <p><u>As solar farms and BESS development progress, more facilities will emerge (if necessary) to manage waste they generate.</u></p> <p><u>The Applicant notes LCC concerns about future landfill capacity within LCC. The Applicant is committed to recycling and reusing as much waste as possible. The Local and Regional Landfill Capacity Assessment demonstrates the applicant would be looking at a Regional (East Midlands) and National level for landfill capacity, not just LCC. On a worst case basis (were by 30% of waste generated by the proposal could not be recycled/reused) landfill for disposal of waste from the Proposed Development (cumulatively with other approved solar farms in the stud area) would not be significant.</u></p>	<p><u>forecasts suggest that most of the landfill capacity within the LCC area is already accounted for and cannot be relied upon to be available to this project. For further details, please refer to the existing Lincolnshire Minerals and Waste Local Plan (Minerals and waste – Lincolnshire County Council) and accompanying documents (particularly the Waste Needs Assessment) as well as the emerging new MWLP (Minerals and waste – Updating the minerals and waste local plan - Lincolnshire County Council). In light of this, please liaise with LCC should you identify at any point that you wish to send waste from your project to sites in the LCC area.</u></p>	
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The DCO contains various requirements which seek to secure the applicable safeguards regarding waste applicable to the Applicant's Local and Regional Landfill Capacity Assessment, including the following secured control documents:

- the Outline Construction Environmental Management Plan (OCEMP) submitted at Deadline 3 [REP3-011], secured within Requirement 7, provides at paragraph 2.15 that the appointed contractors to carry out the work in accordance with the final CEMP will prepare a Construction Resource Management Plan (CRMP) which will specify the waste streams to be monitored and set targets for the re-use and recycling of materials. Table 3.12 provide further evidence to of the mitigations and enhancement measures proposed regarding waste;
- the Outline Environmental Management Plan (OEMP) submitted at Deadline 3 [REP3-015], secured within Requirement 9, provides at Table 3.14 evidence of the proposed mitigation and monitoring measures associated with waste that are to be reviewed and updated post-consent; and
- the Outline Decommissioning Plan (ODP) submitted at Deadline 3 [REP3-013], secured within Requirement 21, provides within Section 3 evidence

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		<u>of the environmental mitigation and management regarding waste.</u>		
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>Waste management (waste hierarchy and recycling) is also outlined during construction through ES Appendix 4.1 Outline Construction Environmental Management Plan (oCEMP) [APP-089REP3-011], operation through ES Appendix 4.4 Outline Operation Environmental Management Plan (oOEMP) [APP-092REP3-015] and decommissioning through ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090REP3-013].</p> <p>Requirements 7 (CEMP), 9 (OEMP) and 21 (Decommissioning and Restoration) of the draft DCO [APP-042REP3-005] secure more detailed plans for each phase of development.</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 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>	Agreed

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
30/01/2026	Email	Email to Lincolnshire County Council regarding a local and regional landfill capacity assessment that was submitted at Deadline 3.
02/02/2026	Email from Lincolnshire County Council	Requesting when a response would be required by

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03/02/2026	Email	Email to Lincolnshire County Council confirming a response as soon as possible and ideally before Hearings the following week
06/02/2026	Email from Lincolnshire County Council	Comments on the outstanding waste matter, and should these be noted, suggest outstanding waste matter is resolved.
10/02/2026	Email	SoCG Rev 3 issued to Lincolnshire County Council
13/02/2026	Email from Lincolnshire County Council	Request comments confirming Lincolnshire County Council position provided via email is placed in the SoCG
13/02/2026	Email	SoCG Rev 4 issued to Lincolnshire County Council
17/02/2026	Email from Lincolnshire County Council	SoCG Rev 4 returned signed by Lincolnshire County Council

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:	
Signature:	

Duly signed and authorised on behalf of
Lincolnshire County Council

Name:	[REDACTED]
Job Title:	Head of Planning
Date:	20/01/2026 17/02/2026
Signature:	[REDACTED]