
Steeple Renewables Project

Applicant comments on Deadline 3 submission

February 2026

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Applicant comments on Deadline 3 submission

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1 Introduction

- 1.1.1 This document provides Steeple Solar Farm Limited (the ‘Applicant’) response to Environment Agency Comments on Deadline 2 Submissions **[REP3-052]** submitted to the Planning Inspectorate by the 22 January 2026, relating to Deadline 3 respectively for a Development Consent Order (‘DCO’) regarding the Steeple Renewables Project (the ‘Proposed Development’).
- 1.1.2 In total 6 third party comments on Deadline 2 Submissions **[REP3-052 to REP3-057]** were submitted to the Examining Authority by interested parties in response to the Proposed Development. All 6 third party comments were published on the 26 January 2026 on the Planning Inspectorates website (reference: EN010163).
- 1.1.3 This document provides responses from the Applicant to Environment Agency Comments on Deadline 2 Submissions **[REP3-052]** received at Deadline 3 were a responses is considered necessary by the Applicant (not every third part comment on Deadline 2 submissions has been responded to). The structure of this document is as follows:
- Table 1.1 tabularised Environment Agency Comments on Deadline 2 Submissions **[REP3-052]** as well as the Applicants corresponding response.

Table 1.1 - Applicant Response to Environment Agency Comments on Deadline 2 Submissions

ID	Verbatim Comment	Applicant Response
REP3-052/1	<p>ENVIRONMENT AGENCY DEADLINE 3: STEEPLE RENEWABLES.</p> <p>RESPONSE TO DOCUMENTS SUBMITTED AT DEADLINE 2.</p> <p>This response constitutes the Environment Agency’s Deadline 3 submission.</p> <p>We have reviewed the Deadline 2 submissions, and our comments are set out below. A summary of our position is provided in Appendix 1: Work Package Tracker</p>	Noted.
REP3-052/2	<p>[REP2-008] 3.1 Draft Development Consent Order (Tracked) (Revision A)</p> <p>The Environment Agency requests inclusion as a named consultee on:</p> <ul style="list-style-type: none"> • Requirement 9 Operational environmental management plan • Requirement 10 Fire risk management plan • Requirement 16 Surface and foul water drainage • Requirement 21 Decommissioning and restoration 	<p>The Applicant is content to add the EA as consultee on matters related to their functions for requirements 9, 10 and 16. The Applicant will make these amendments at Deadline 5. In relation to requirement 21, the Applicant notes that consultation with the EA is already secured by requirement 21(4).</p>

<p>REP3-052/3</p>	<p>[REP2-012] Flood Risk Assessment</p> <p>We are generally satisfied that the amendments address our concerns.</p> <p>Para. 8.1.4 Regarding the impact of development on flood risk, we accept the general conclusion that any displacement of floodwater will be negligible. However we still feel that further quantification should be provided to support the assertion that floodplain impact will be negligible. This does not need to be modelled, but can take the form of a basic volumetric calculation to support the conclusion.</p>	<p>Paragraph 8.1.4 of the Flood Risk Assessment [REP2-011] has been updated to include a basic volumetric calculation of the floodwater displaced during the decommissioning phase. The following text will be added to the Flood Risk Assessment:</p> <p><i>“The development within the 1 in 100 year plus 39% climate change extent would comprise approximately 5,200 solar panels and approximately 18 inverters. The solar PV panels would be supported on C section galvanised steel posts driven into the ground which are estimated to be less than 0.5% of the panel area. Each panel has an area of 70m², which equates to 364,000m² across all solar panels within the flood extent. 0.5% of this panel area would be 1,820m². Assuming an average flood depth of 500mm, which is considered approximate based on the maximum depth of 0.85m, this would equate to 910m³ of water displaced by the solar panel supports. The invertors each have an area of 7 x 3.5 = 24.5m², therefore 18 invertors would occupy 441m². Assuming an average floodwater depth of 500mm, this would equate to 220.5m³ of water displaced by the invertors. The total floodwater displaced during 1 in 100 year plus 39% climate change event during the 12 month decommissioning phase by the steel posts and invertors is therefore 1130.5m³.</i></p> <p><i>The total area of the site affected by the 1 in 100 year plus 39% climate change flood extent is 1.15km² (1,150,000m²). Assuming an average flood depth of 500mm across the whole area, the total volume of flood storage within the site during the 1 in 100 year plus 39% climate change event is approximately 575,000m³. The estimated displaced floodwater equates to approximately 0.19% of the total floodwater storage volume within the site which is not considered significant.”</i></p> <p>The updated Flood Risk Assessment (Rev 3) will be submitted at Deadline 4.</p>
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<p>REP3-052/4</p>	<p>[Rep2-013, REP2-014 & REP2-015] Hydraulic Modelling</p> <p>Regarding sensitivity testing for the Catchwater Drain, the updates to the hydraulic modelling report dated January 2026 are welcomed and the results appear reasonable. It is noted that structures have now been included within the respective 1d model networks as requested and sensitivity testing has been undertaken. It would be useful if the applicant could provide a copy of the updated 1d models described in the model report so we can validate the associated flood risk impacts which are described.</p>	<p>The 1D model has been provided to the EA for review.</p>
<p>REP3-052/5</p>	<p>[REP2-019] Hydrology, Hydrogeology, Flood Risk and Drainage (Tracked) (Revision 2)</p> <p>[REP2-022] Phase 1 Geoenvironmental Desk Study (Tracked) (Revision 2)</p> <p>[REP2-024-028] Phase 1 Geoenvironmental Desk Study Appendix (B) Historical Maps</p> <p>[REP2-037] Water Framework Directive Assessment (Tracked) (Revision 2)</p> <p>We have been unable to review these documents in time for this deadline and will provide comments at Deadline 4.</p>	<p>Noted.</p>
<p>REP3-052/6</p>	<p>[REP2-030] Outline Fire Risk Management Plan (Tracked) (Revision 2)</p> <p>We are generally satisfied that the amendments address our concerns regarding the use and management of fire water.</p>	<p>Noted.</p>
<p>REP3-052/7</p>	<p>[REP2-034] Surface Water Drainage Strategy (Tracked) (Revision 2)</p>	<p>Noted.</p>

	<p>We are satisfied that the amendments made address our concerns regarding the management of potentially contaminated firewater, and the associated maintenance activities of the associated infrastructure.</p>																																																																															
<p>REP3-052/8</p>	<p>Appendix 1: Work Package Tracker</p> <table border="1"> <thead> <tr> <th>Subject</th> <th>Work package</th> <th>Scope</th> <th>Method</th> <th>Results</th> <th>Mitigation</th> <th>Requirement</th> <th>Tier1 (matter for refusal)/ Tier2 (can be resolved in inquiry)</th> <th>Notes</th> </tr> </thead> <tbody> <tr> <td>Flood risk</td> <td>Flood Risk Assessment</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>T2</td> <td>Working on resolutions.</td> </tr> <tr> <td>Flood Risk</td> <td>Flood Risk Modelling</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>T2</td> <td>Model for Catchwater Drain has been updated and results appear reasonable. EA requests sight of the updated 1d models for validation of the associated flood risk impacts</td> </tr> <tr> <td>Ecology and Fisheries</td> <td>Decommissioning Plan</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>T2</td> <td>Resolved.</td> </tr> <tr> <td rowspan="4">Ground water & contaminated land</td> <td>Conceptual Site Model</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>T2</td> <td>Working on a solution. Updated CSM still to be reviewed.</td> </tr> <tr> <td>oCEMP</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>T2</td> <td>Issues regarding groundwater testing have been resolved. Mitigation for unexpected contamination, and instruction for dewatering, should both be included in Outline CEMP, OEMP & DP.</td> </tr> <tr> <td>Surface Water Drainage Strategy</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>T2</td> <td>Resolved</td> </tr> <tr> <td>Outline Fire Risk Management Plan</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>T2</td> <td>Resolved</td> </tr> <tr> <td>Water Quality</td> <td>oCEMP</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>T2</td> <td>Expand wording of the oCEMP to ensure adequate scope of the detailed management plans : Temporary Construction Drainage Strategy, Water Management Plan, Foul Water Management, Pollution Incident and Emergency Response Plan</td> </tr> </tbody> </table>	Subject	Work package	Scope	Method	Results	Mitigation	Requirement	Tier1 (matter for refusal)/ Tier2 (can be resolved in inquiry)	Notes	Flood risk	Flood Risk Assessment						T2	Working on resolutions.	Flood Risk	Flood Risk Modelling						T2	Model for Catchwater Drain has been updated and results appear reasonable. EA requests sight of the updated 1d models for validation of the associated flood risk impacts	Ecology and Fisheries	Decommissioning Plan						T2	Resolved.	Ground water & contaminated land	Conceptual Site Model						T2	Working on a solution. Updated CSM still to be reviewed.	oCEMP						T2	Issues regarding groundwater testing have been resolved. Mitigation for unexpected contamination, and instruction for dewatering, should both be included in Outline CEMP, OEMP & DP.	Surface Water Drainage Strategy						T2	Resolved	Outline Fire Risk Management Plan						T2	Resolved	Water Quality	oCEMP						T2	Expand wording of the oCEMP to ensure adequate scope of the detailed management plans : Temporary Construction Drainage Strategy, Water Management Plan, Foul Water Management, Pollution Incident and Emergency Response Plan	<p>Noted.</p>
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