

PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

**APPLICATION BY STEEPLE SOLAR FARM LIMITED FOR AN ORDER GRANTING DEVELOPMENT
CONSENT FOR THE STEEPLE RENEWABLES PROJECT (PINS REFERENCE: EN010163)**

SUBMISSION ON BEHALF OF SNSE LIMITED AND SNSD LIMITED AT DEADLINE 5

RESPONSE TO EXQ2 AND COMMENTS ON DEADLINE 4 SUBMISSIONS

1. Introduction

- 1.1 This note is submitted on behalf of our clients, SNSE Limited and SNSD Limited who are landowners for both the Steeple Renewables Project and parts of the North Humber to High Marnham Scheme (the “**Landowner**”)
- 1.2 This note provides their response to the questions posed to them within the second written questions of the Examining Authority (“**ExA**”) (“**ExQ2**”) (PD-008) and to the submissions of National Grid Electricity Transmission PLC (“**NGET**”) at Deadline 4 relating to Issue Specific Hearing 3 (REP4-007).

2. Response to ExQ2

- 2.1 The ExA has posed two questions to the Landowner, which are Q7.1.1 relating to cumulative effects, and Q7.2.3 relating to the interactions of the proposed North Humber to High Marnham (“**NHHM**”) Project with the Steeples Renewables Project.
- 2.2 Q7.1.1 posed by the ExA requests an explanation of other important projects which the Landowner wishes to facilitate and projected timescales for those to come forward.
- 2.3 The Landowner’s response to Q7.1.1 is as follows:
- (a) The other potential projects referred to in the issue specific hearing (ISH) 3 submissions on behalf of SNSE Limited and SNSD Limited are as follows:
 - (i) a data centre on part the Landowner’s land
 - (ii) development relating to the STEP (Spherical Tokamak for Energy Production) Nuclear Fusion Project which is due to come forward at the West Burton power station site
 - (b) An option has been granted in relation to land in July 2025 which would allow for the acquisition of the relevant land, which the NHHM Project would intersect with, for the development of a data centre. The option period runs for a period of three years ending in July 2028. Planning consent is anticipated to be sought and obtained within this period. The option is a commercial agreement, and so only limited information can be provided to the ExA in relation to it. The data centre project would be taken forward by a third-party entity. An application for planning permission is yet to be submitted, and there has not been any EIA screening or scoping request submitted. The project does not therefore appear to qualify as a cumulative project for the purposes of the EIA for the Steeple Renewables Project. However, it is anticipated that it may do so for the NHHM Project application. SNSE Limited and SNSD Limited continues to seek meaningful discussion with NGET on the route of its project so as to avoid, inter alia, an impact on the data centre project which would otherwise deliver very significant benefits.
 - (c) The STEP Nuclear Fusion Project is promoted by the UK Industrial Fusion Solutions and is currently in its pre-application consultation phase. The publicly available programme document for the STEP Nuclear Fusion Project ¹ details that an application for development consent is proposed for submission in Q1 2029. An EIA Scoping Opinion is proposed to be requested in Q3/Q4 2026. The Landowner is aware of the scale and complexity of the STEP Nuclear Fusion Project and its construction and, as it is an owner of significant areas of land adjacent to and surrounding the West Burton Power Station, where the STEP Nuclear Fusion Project is proposed, anticipates that it may be necessary for development associated with that project to utilise land in its ownership.

¹ https://stepfusion.com/wp-content/downloads/STEP_Fusion_PINS_Programme_Document.pdf

- 2.4 Q7.2.3 has queried whether NGET would need to seek protective provisions for the NHHM Project within the DCO for the Steeple Renewables Project should the NHHM Project be located in an alternative alignment, but which continues to cross the Order limits for the Steeple Renewables Project.
- 2.5 In response to this question, whilst the Landowner recognises that this is principally a question for the Applicant and NGET to respond to, the Landowner nonetheless identifies that the NGET protective provisions in so far as they relate to the NHHM Project are drafted very broadly to reflect the formative stage of the NHHM Project and changes to where this will be located, such that this would be the effect of them in any event. This serves to evidence the chilling nature of the protections that NGET are seeking for the affected project, and which whilst premised on the concept of co-operation between parties via private agreements not before the ExA, seeks to achieve this through safeguarding not otherwise deemed necessary by parliament to be directed for NGET grid upgrade projects, and by placing the person subject to such provisions in an unfair and diminished negotiating position which is not necessary for NGET to obtain consent for and deliver the NHHM Project.
- 3. Response to NGETs Deadline 4 submissions relating to Issue Specific Hearing 3**
- 3.1 The ExA will be aware of the submissions made on behalf of each of NGET and the Landowner at ISH3 orally, and of the written submissions of those summaries submitted for Deadline 4.
- 3.2 The Landowner's response to NGETs submissions at ISH3 addresses matters contained within them and updates on engagement between the Landowner and NGET since ISH3, noting how NGET presented to the ExA that it would be engaging with the Landowner.
- 3.3 Turning to NGETs submissions directed at the Landowner, NGETs submissions at paragraph 11 the written summary of oral submission at ISH3 ([REP4-007](#)) identify that: *"the route selection process for NHHM is necessarily a sophisticated and iterative"*; that *"The interaction with the Project is only one of multiple considerations and extends for approximately two kilometres of the total 90 kilometre extent of NHHM"*; the focus of the Landowner *"on their own commercial interests"* is *"narrow"*; and that *"NGET's position is more complex and more nuanced"*.
- 3.4 The suggestion in those submissions is the Landowner has not had regard to the full range of relevant material planning considerations when identifying an alternative route, or indeed is not sufficiently sophisticated to do so, which is not the case, and also that the local routing of the NHHM Project in the location in question is somehow dictated and/or influenced by other parts of the 90 kilometre route. Neither of these matters are correct, and the ExA should not be persuaded by them in so far as they would suggest that there is a high level of certainty regarding where the NHHM Project will be located and which would in turn be a relevant consideration for the justification of the imposition of protective provisions NGET are seeking for the NHHM Project.
- 3.5 With respect to the scope of the considerations of the Landowner, it is acutely aware that any alternative which it puts forward must be preferable from an alternative's perspective, and that for this to be the case the full range of technical, planning, environmental and cost considerations will need to be taken into account.
- 3.6 As is clear from the Landowners previous submissions detailing its consideration of the alternative route it has suggested in comparison to NGETs current stated preferred route ([REP4-013](#)) and the submissions below in response to NGETs preliminary and high-level views on the alternative routes provided in its Deadline 3 ([REP3-053](#)) and Deadline 4 ([REP4-007](#)) submissions, the Landowner has had regard to the full range of relevant matters to identify an appropriate alternative route, notwithstanding the basis for which the Landowner is identifying an alternative is to best protect its land (and the other projects identified above) from being significantly adversely affected in a manner which is not necessary or justifiable to achieve the delivery of the NHHM Project.
- 3.7 Moreover, the Landowner identifies that there is not, and notes that in the information consulted on in relation to the NHHM Project by NGET and in submissions to the EXA it has not been evidenced

that there is, any material influence of the remainder of the route for the NHHM Project on the local routing of the NHHM Project in this specific location. The relevant considerations, noting the overall strategic route is set, relate to a micro-siting of a route within a corridor, and local to the surrounding environment. Accordingly, there is not anything of wider project significance which dictates that NGETs current stated preferred route is that which must be taken, and which is therefore necessary and preferable to any alternative put forward by the Landowner.

- 3.8 It is not therefore for NGET to prove that an alternative is not preferable. Rather, it is for NGET to properly consider which route is preferable having regard to all relevant matters, and to cogently explain its analysis and reasoning in that respect. It is also no answer for NGET to state that it has considered multiple options to support a position that its current stated route is certain, as it seeks to do so in paragraph 13 of its Deadline 4 submissions ([REP4-007](#)). What is important is that the assessment of all reasonable alternative routes in comparison to one another demonstrably show that the selected route is justified, and that the public interest does therefore lie firmly in favour of it.
- 3.9 The preliminary and high-level observations of NGET (as NGETs own submissions orally and in writing have confirmed them to be) are not sufficient to evidence that the current stated route is demonstrably preferable to other alternatives which the Landowner has put forward.
- 3.10 Before turning to NGETs preliminary and high-level observations, it will be of assistance to the ExA to explain the engagement which has taken place since ISH3.
- 3.11 The ExA will note that at paragraph 14 (c) of its submissions, NGET identified that it is *“still in the process of considering the December 2025 request, following its proper procedure, which includes drawing up a full plan with tower and stringing positions, access roads and limits of deviation.”*, and that at a meeting arranged for 23 February 2026 (at the request of the Landowner) the Landowner would be informed of the outcome of NGETs consideration of the alternative.
- 3.12 In reality this was not the case. NGETs representatives at that meeting did not provide detailed information or cogent explanation as to the approach undertaken by NGET in considering the Landowner’s alternative route in terms of relevant engineering, planning, environmental or wider considerations. Nor did NGET’s representatives explain how those considerations compare to like considerations for NGET’s stated preferred route. There was no presentation of any plans drawn up with *“tower and stringing positions, access roads and limits of deviation”*. This is information which has since been formally requested by the Landowner and in respect of which it awaits a response to confirm if this will be provided.
- 3.13 Instead, the persons who represented NGET at the meeting, far from explaining the multifactorial considerations of NGET, provided vague answers to the Landowner’s questions and repeatedly emphasised that their expertise was limited to land matters only; they could not discuss consenting or engineering points in any detail, despite those being the matters of most relevance to the assessment of the alternative route.
- 3.14 The information that has been provided to the Landowner to date on the alternative route which it put forward to NGET in December 2025 by NGET remains that which is included in NGETs previous submissions to ExA, which are preliminary and high-level observations only.
- 3.15 Turning back to those preliminary and high-level observations, irrespective of NGETs failure to yet provide its full analysis and position on the Landowner’s alternative route, the Landowner has taken into account the feedback that NGET has provided, and it has put forward to NGET a micro-sited refinement of the alternative route which seeks to positively respond to this.

- 3.16 A copy of the plan depicting the micro-sited version of the western route alignment from 4AF203 to 4AF222 (the “**Alternative Route**”) is included at **Appendix 1** to this note². For ease of comparison, the plan showing the December 2025 alternative route is located at **Appendix 2**.
- 3.17 With respect to the Alternative Route and how this responds to NGETs preliminary and high-level criticisms of the alternative route that was put forward in December 2025:
- (a) the relative AOD heights of indicative pylon locations for NGETs preferred route and the Alternative Route are noted on the plan of the Alternative Route at **Appendix 1**. Reviewing all the relevant locations, NGET’s route is in places located on significantly higher ground, of 49m AOD at 4AF220, by comparison to the highest AOD for the Alternative Route being identified at LC15 of 37m AOD (rising to 43m AOD to meet NGET’s 4AF222). Heights of the two routes are otherwise generally similar. The relative height and therefore visibility of the Project is not anticipated to be a reason why NGET’s stated preferred route is preferable to the Alternative Route;
 - (b) the Alternative Route has moved to the east by comparison to the December 2025 alternative route, further away from St Helen’s Church, as well as in a more equidistant position between South Wheatley and Sturton le Steeple. This has also moved the Alternative Route further away from the animal care facility and domestic dwelling (known as The Crest), which is no longer subject to oversailing. Whilst there are inevitably some properties which could be considered near to the overhead cables of the Alternative Route, that position is the same for NGET’s preferred route, and which is in closer proximity to a greater number of listed buildings at Sturton le Steeple; and
 - (c) the Alternative Route continues to cross the National Grid Energy Distribution 132 kV steel lattice overhead line, which would only be avoidable where routing through the very limited underground part of the cable route out from the West Burton Power Station. Having considered the cost and other implications of the Alternative Route, in the Landowner’s view, the need to route in a specific manner so as to avoid that crossing would not be an appropriate overriding consideration for selecting a route for the Project, and it is noted that must also be NGETs view given all routes which remain within the western route corridor for the Project, as consulted on by NGET in 2023, would require such a crossing and if technically necessary the further undergrounding of that 132 kV line.
- 3.18 The micro-sited Alternative Route also provides numerous benefits to NGET and the public, as follows:
- (a) the routing of the Project in this location, and which as identified above appears to be unaffected by any other changes which have previously been made to any other elements of the route of the Project, would be significantly shortened (resulting in associated cost-savings of approximately £3.8m (a figure calculated on the basis of the costings in NGET’s Preliminary Routing and Siting Study (2023)) and associated construction programme savings), and would avoid the sharp changes in direction which has been introduced, and which is clearly not compliant with the Holford Rules;
 - (b) the Alternative Route would take the Project further away from Sturton le Steeple, which has a number of important and statutorily designated heritage assets which would be impacted, as well as residential dwellings that would be severely impacted by NGET’s stated preferred route, noting its north to south alignment which inevitably increases the impact of a north to

² The plan at Appendix 1 has been prepared by RES, who are a group company of the Applicant for the Steeple Renewables Project, but the Alternative Route is not confirmed to be endorsed by them.

south aligned overhead line in close proximity to the west of the village and views out from the same;

- (c) the Alternative Route would avoid the likely traffic conflict and congestion which it is anticipated will arise in connection with the use of a haul road connecting to Gainsborough Road in connection with consented aggregates based operations by Holcim (UK) Limited if the preferred route is consented, and which there is no evidence to date that NGET have had regard to or undertaken any form of highways impact assessment in respect of; and
- (d) the micro-sited Alternative Route would avoid sterilising (i) approximately 90 acres of the Steeple Renewables Project; (ii) parts of the Landowner's Estate that could accommodate the STEP Plant Associated Development; and (iii) the development potential of land which has been allocated for the Data Centre and in respect of which an option has been entered into. It would also avoid impacts on the proposed primary access for the STEP Nuclear Fusion Project, in respect of which no form of assessment has been undertaken. All of those projects attract strong planning policy support by virtue of delivering on the Government's agenda for sustainable economic growth and securing renewable energy supplies, which NGET's stated preferred route would have the effect of significantly prejudicing.

- 3.19 Whilst therefore the Landowner acknowledges the plan shows a "*line on a map*", the placing of that line on that map clearly considers all matters of relevance, and what has been put forward is by no means inchoate. There may be some refinement that is required to the Alternative Route, but that is no reason for it to be disregarded without proper consideration by NGET. To this end the Landowner has offered detailed discussions with NGET to further refine the micro siting of the Alternative Route.
- 3.20 The above information demonstrates that there is not certainty regarding where the NHHM Project will be routed in the location of the Steeple Renewables Project, or indeed that consent (including the grant of powers to compulsorily acquire land and rights in land) will be capable of being obtained for the NHHM Project for NGET's current stated preferred routing.
- 3.21 This is relevant to the ExAs consideration of whether it is appropriate to include the protective provisions for the NHHM Project NGET is seeking, notwithstanding the wider policy issues with doing so where parliament has not otherwise directed that safeguarding for NGET grid upgrade projects is necessary, as is explained above.

Town Legal LLP

24 March 2026

002702/0001/MJ

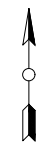
Appendix 1
Micro-sited Alternative Route

- KEY:
- STEEPLE ORDER LIMITS
 - MITIGATION AREA
 - FUTURE DEVELOPMENT OPPORTUNITY
 - NHHM OHL SCHEME
 - LANDOWNER PROPOSED NHHM ROUTE DEVIATION (OPTION C)

OPTION C (AF203-AF222) LENGTHS (m)	
TOTAL	5036.35
STEEPLE	2270.10
WOOD LANE	450.00

DC MARKUP WITH AOD LEVELS
BLACK FROM TOPO SURVEY
RED FROM GOOGLE EARTH (LESS RELIABLE)

SHEET 1 OF 2

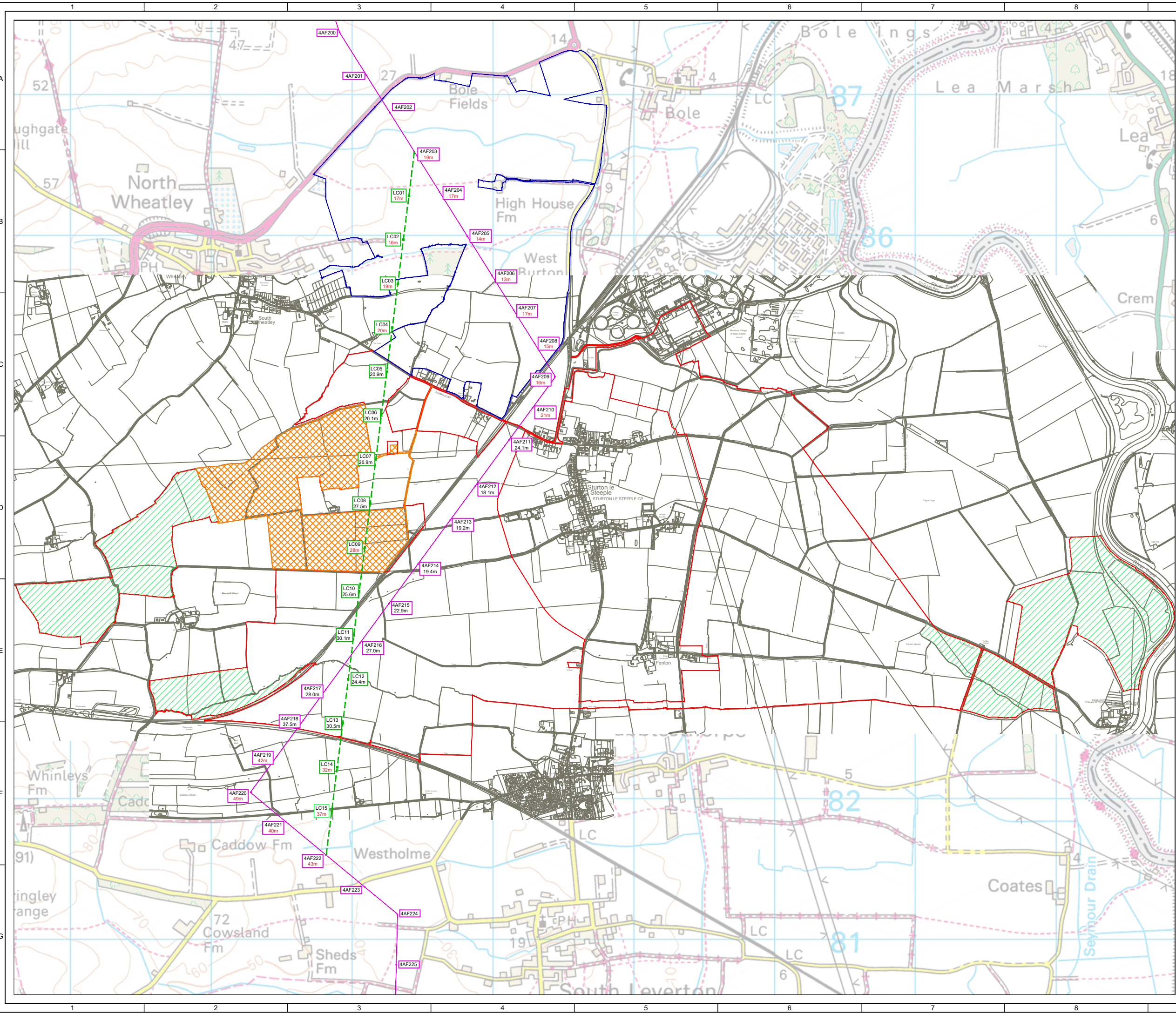


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COORDINATES					
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PROJECT TITLE					
STEEPLE RENEWABLE PROJECTS					
DRAWING TITLE					
NGET NHHM ROUTE OPTIONS WESTERN CORRIDOR ALTERNATIVE ROUTE					
DRAWING NUMBER					REV
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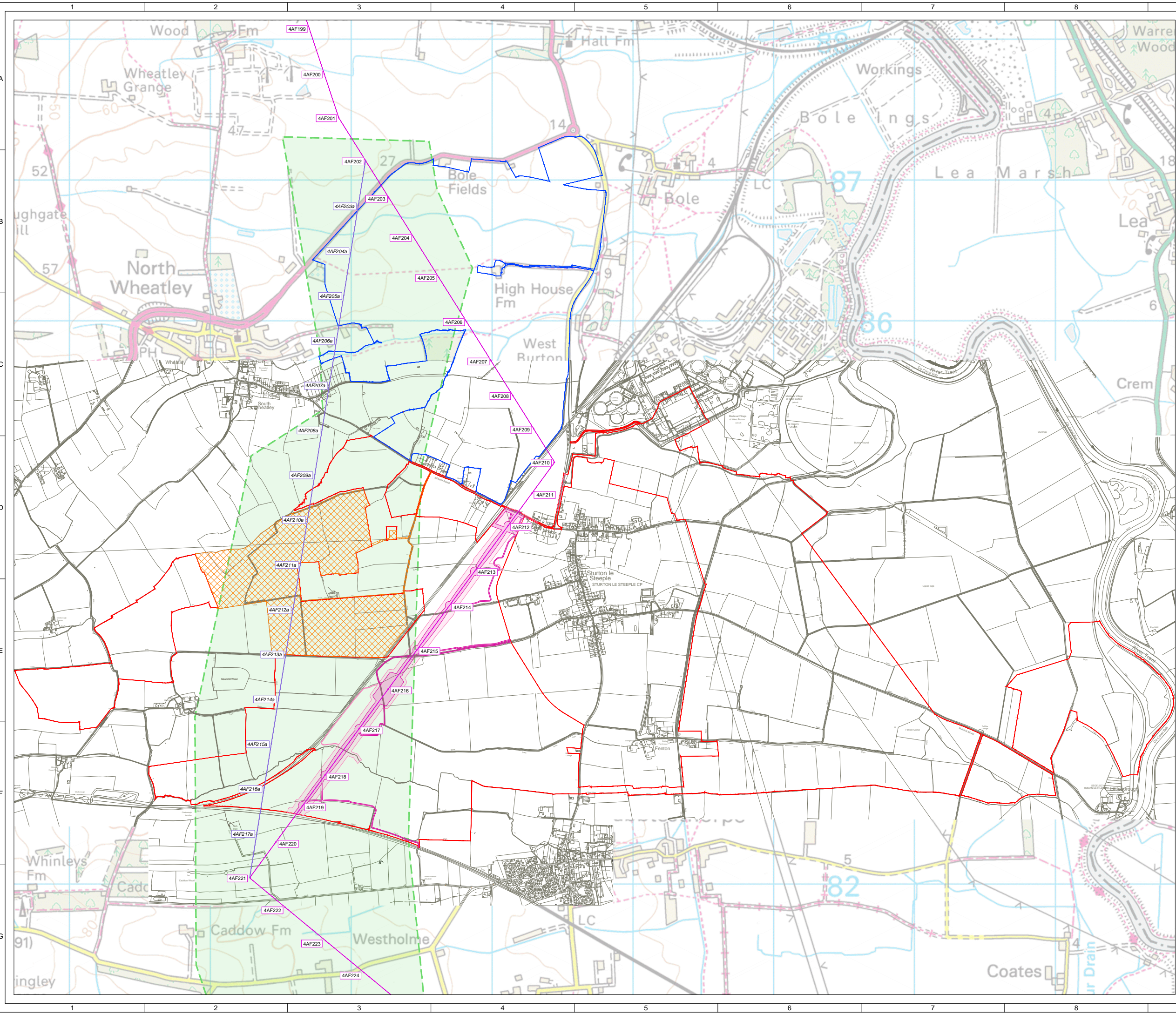
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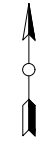


Appendix 2
December 2025 Alternative Route



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2025 LICENCE NUMBER AC0000808122.

- KEY:**
- STEEPLE RENEWABLES PROJECT - ORDER LIMITS (2025)
 - NHHM WESTERN CORRIDOR
 - WOOD LANE SOLAR
 - FUTURE DEVELOPMENT OPPORTUNITY
 - NHHM OHL SCHEME PRELIMINARY ROUTE
 - TEMPORARY STERILIZATION
 - PERMANENT STERILIZATION
 - PROPOSED ROUTE DEVIATION



0	FG										First Issue
ISSUE	DRAWN	CHKD	APPD	DATE							REVISION NOTES

PURPOSE	PRELIMINARY	SCALE @ A3	1:25,000
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LAYOUT DRAWING	N/A	T-LAYOUT NO	N/A
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COORDINATES	OSGB36/BNG (EPSG:27700)
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PROJECT TITLE	STEEPLE SOLAR FARM
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DRAWING TITLE	COMBINED WOOD LANE SOLAR STEEPLE RENEWABLES PROJECT AND NHHM OHL PROPOSAL
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DRAWING NUMBER	04954-RES-LAY-DR-LE-036	REV	0
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