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# Steeple Renewables Project

## Applicant Comments on Deadline 4 Submissions

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## Applicant Comments on Deadline 4 Submissions

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## 1 Introduction

- 1.1.1 This document provides Steeple Solar Farm Limited (the ‘Applicant’) response to Deadline 4 submissions by other parties, submitted to the Planning Inspectorate by the 19 February 2026 (plus one late submission accepted at the discretion of Examining Authority), relating to Deadline 4 respectively for a Development Consent Order (‘DCO’) regarding the Steeple Renewables Project (the ‘Proposed Development’).
- 1.1.2 In total 19 submissions by others [**REP4-001 to REP4-018 and REP4-037**] were submitted to the Examining Authority by interested parties in response to the Proposed Development and were published on the 25 February 2026 on the Planning Inspectorates website (reference: EN010163).
- 1.1.3 This document provides responses from the Applicant to submissions by other parties received at Deadline 4 where a response is considered necessary by the Applicant (not every submissions by other parties received at Deadline 4 has been responded to). The structure of this document is as follows:
- Table 1.1 tabularised list of submissions by other parties received at Deadline 4 the Applicant has responded to.
  - Section 2 tabularised submission by other parties received at Deadline 4 as well as the Applicants corresponding response.

**Table 1.1 List of submissions by other parties received at Deadline 4 that are responded to in Section 2**

<b>PINs reference</b>	<b>Submissions received at Deadline 4 from</b>
REP4-001	Nottinghamshire County Council
REP4-002	Sturton-le-Steeple Parish Council
REP4-003	Sturton-le-Steeple Parish Council
REP4-005	National Grid Electricity Transmission Plc
REP4-006	National Grid Electricity Transmission Plc
REP4-007	National Grid Electricity Transmission Plc
REP4-008	EDF Energy (Thermal Generation) Limited
REP4-010	Fields for Farming
REP4-011	Fields for Farming
REP4-012	Fields for Farming
REP4-014	Mr & Mrs J Barlow
REP4-015	Mr & Mrs J Barlow
REP4-016	Mr & Mrs J Barlow
REP4-017	Karen Hodgson
REP4-037	Sturton-le-Steeple Parish Council

## 2 Applicant Response to submissions by other parties received at Deadline 4 listed in Table 1.1

**Table 2-1: Nottinghamshire County Council**

ID	Verbatim Comment	Applicant Response
REP4-001/1	<p><b>ISH2 AP1: SUBMIT A DRAFT, UNSIGNED, IF NECESSARY, STATEMENT OF COMMON GROUND.</b></p> <p>This has been updated and agreed with the Applicant and will be submitted by the Applicant. It remains unsigned at present to allow for further updates in light of subsequent discussions on outstanding matters and will be signed by the County Council at Director level ahead of Deadline 5.</p>	<p>The Applicant notes the response of the County Council which reflects its understanding of the situation.</p>
REP4-001/2	<p><b>ISH2 AP3: PROVIDE FURTHER CLARITY ON THE ACCESS TO THE PROPOSED BESS FROM COMMON LANE, INCLUDING WHETHER IT IS A HIGHWAY; WHETHER IT IS GATED; AND RESPOND TO THE QUERY REGARDING WEIGHT RESTRICTION.</b></p> <p>Common Lane in Sturton le Steeple has dual status of being A) an adopted all-purpose highway and B) a restricted minor byway. It is not gated at the point where the BESS access would be created and is an all-purpose highway at this point. There is a legacy weight restriction sign which exists because of the former culvert/bridge over the Catchwater Drain. However, NCC</p>	

	<p>Highways Structures have confirmed that the bridge saddle structure was strengthened to 40 tonnes GVW in 1991. All legacy weight limit signs were not entirely removed to help deter HGV vehicles using this area. So, in short, Common Lane is suitable for heavy vehicle access, although there are some signs that say otherwise.</p>	
<p>REP4-001/3</p>	<p><b>ISH3 : ARCHAEOLOGICAL REQUIREMENTS</b></p> <p>The County Council considered the proposed requirement wording for archaeology insufficient to accommodate the complexity of a scheme where the applicant proposes a post-consent phase of evaluation to inform an updated Archaeological Mitigation Strategy (AMS), and multiple phases of work programmes.</p>	
<p>REP4-001/4</p>	<p>Draft wording (is based on appropriate wording that has recently been approved by the SoS for similar schemes) was informally shared with the applicant at the start of ISH3 on 13 February . The relevant Planning Authority would be NCC. We received some comments from the applicant on 18 February which suggested revisions to the proposed requirements considering our wording and then went back with revised proposals which the applicant has commented on and we have agreed as of 19 February at 15.50 :</p>	<p>The Applicant would note that the wording shared on the 19 February was wording that was subject to ongoing discussion. For complete avoidance of doubt, the wording provided to NCC on the 19 February at 14.04 was per the below. The Applicant has since confirmed the wording as being accepted with NCC, and has updated the dDCO accordingly at requirement 17.</p> <p>It should be noted that the relevant planning authority in this requirement will not be NCC. It will be the local planning authority as defined by the Order. NCC’s role in terms of archaeology is protected through the role of the County Archaeologist. This is in accordance with NCC’s statutory functions.</p> <p>(1) No phase of the authorised development, and no part of the site preparation works, may commence until:</p> <ul style="list-style-type: none"> <li>a. <b>a scheme for additional trial trenching</b> <del>an archaeological written scheme of investigation (WSI) for that phase</del> has been submitted and approved by the local planning authority in consultation with the county archaeologist.</li> <li>b. <b>additional trial trenching has been carried out in accordance with the scheme approved under sub paragraph (a);</b></li> </ul>

		<p>c. a Written Scheme of Investigation (WSI) for each phase, to account for the results of the additional trial trenching carried out, is submitted to and approved in writing by the local planning authority.</p> <p>(2) Any archaeological works or programme of archaeological investigation carried out under the approved WSIs must be carried out by an organisation registered within the Chartered Institute for Archaeologists or by a member of that Institute, and the nominated organisation and its relevant specialists will be identified and agreed within the WSI.</p> <p>(3) <del>This</del> The WSIs shall include:</p> <p>a scheme for <del>additional trial trenching</del> each phase or mitigation work setting out where archaeological work is required and to ensure appropriate measures from protection, preservation and/or recording of archaeological remains;</p> <p>measures for post-excavation analysis, reporting, publication and archiving for appropriate archaeological remains; <del>and</del></p> <p><del>measures for protection and preservation for appropriate archaeological remains; and</del></p> <p>and shall be in substantial accordance with the outline WSI.</p> <p>(4) Any archaeological works must be carried out in accordance with the approved WSIs, including any post-excavation analysis, reporting, publication and archiving.</p> <p>(5) For the purposes of this paragraph only, any works undertaken in pursuance of sub-paragraph 1(b) are excluded from the definition of “commence” in article 2 of this Order.</p>
<p>REP4-001/5</p>	<p>(1) No phase of the authorised development, and no part of the site preparation works, may commence until:</p> <p>a. a scheme for additional trial trenching an archaeological written scheme of investigation (WSI) for that phase has been</p>	

	<p>submitted and approved by the local planning authority in consultation with the county archaeologist.</p> <p>b. additional trial trenching has been carried out in accordance with the scheme approved under sub paragraph (a);</p> <p>c. a Written Scheme of Investigation (WSI) for each phase, to account for the results of the additional trial trenching carried out, is submitted to and approved in writing by the local planning authority.</p>	
<p>REP4-001/6</p>	<p>2) Any archaeological works or programme of archaeological investigation carried out under the approved WSIs must be carried out by an organisation registered within the Chartered Institute for Archaeologists or by a member of that Institute, and the nominated organisation and its relevant specialists will be identified and agreed within the WSI.</p>	
<p>REP4-001/7</p>	<p>3) This The WSIs shall include:</p> <p>(1) a scheme for additional trial trenching each phase or mitigation work setting out where archaeological work is required and to ensure appropriate measures from protection, preservation and/or recording of archaeological remains.</p> <p>(2) measures for post-excavation analysis, reporting, publication and archiving for appropriate archaeological remains; and</p>	

	<p>(3) measures for protection and preservation for appropriate archaeological remains; and</p> <p>(4) and shall be in substantial accordance with the outline WSI.</p>	
REP4-001/8	<p>(4) Any archaeological works must be carried out in accordance with the approved WSIs, including any post-excavation analysis, reporting, publication and archiving.</p>	
REP4-001/9	<p>(5) For the purposes of this paragraph only, any works undertaken in pursuance of sub-paragraph 1(b) are excluded from the definition of “commence” in article 2 of this Order.</p>	
REP4-001/10	<p><b>ISH3 AP3: TIMINGS FOR DETERMINING A PERMIT UNDER NCC’S PERMIT SCHEME.</b></p> <p>The timescales for the street authority to issue a permit following receipt of an application are set out within the Nottinghamshire County Council Permit Scheme Order and will vary according to the proposed work category.</p> <p>Table 2 of the Scheme Order confirms an application for a permit will be issued <b>within 5 days</b> for standard and major work.</p>	<p>The Applicant has commented previously on the request for the incorporation of a permit scheme into the dDCO. The Applicant considers that the time period for a permit scheme to be unrelated to the principal that a permit consent unnecessarily duplicates the consent procedures in the DCO, and that this would be contrary to the ethos and purpose of the DCO regime. However, if the ExA is minded to include the article provided by NCC at the expense of the Applicant’s article 9 (application of the 1991 Act), then the Applicant would request the following amendments be made:</p>
REP4-001/11	<p>The Steeples DCO should be amended to make explicit reference to the Permit Scheme Order. The Applicant is referred to the recently made Tillbridge Solar Order for precedent on how this should be integrated into Part 3 of the dDCO (see below).</p>	

<p>REP4-001/12</p>	<p><b>Application of the relevant permit scheme</b></p> <p>9. (1) The relevant permit scheme applies with the modifications set out in this article to street works carried out under the power conferred by article 8 (street works) of this Order</p> <p>(2) For the purposes of this Order –</p> <p>(a) a permit may not be refused or granted subject to conditions which relate to the imposition of a moratoria; and</p> <p>(b) a permit may not be granted subject to conditions where compliance with those conditions would constitute a breach of this Order or where the undertaker would be unable to comply with those conditions pursuant to the powers conferred by this Order.</p> <p>(3) References to the moratoria in the sub-paragraph (2) mean restrictions imposed under section 58 (restrictions on works following substantial road works) or section 58A (restrictions on works following substantial road works) or section 58A (restrictions on works following substantial street works) of the 1991 Act.</p> <p>(4) Without restricting the undertaking recourse to any of the alternative appeal mechanism which may be available under the relevant permit scheme or to grant a permit or otherwise, the undertaker may appeal any decision to refuse to grant a permit or to grant a permit subject to conditions pursuant to the permit scheme in accordance with the mechanism set out in</p>	<p><b>Application of the relevant permit scheme</b></p> <p>9. (1) The relevant permit scheme applies with the modifications set out in this article to street works carried out under the power conferred by article 8 (street works) of this Order</p> <p>(2) For the purposes of this Order –</p> <p>(a) a permit may not be refused or granted subject to conditions which relate to the imposition of a moratoria; and</p> <p>(b) a permit may not be granted subject to conditions where compliance with those conditions would constitute a breach of this Order or where the undertaker would be unable to comply with those conditions pursuant to the powers conferred by this Order.</p> <p><b>(c) where the undertaker makes an application for a permit pursuant to a relevant permit scheme, the relevant highway authority for that scheme shall issue its response within five (5) working days of such application;</b></p> <p><b>(d) the undertaker shall not be responsible for the payment of any fee imposed by a relevant permit scheme.</b></p> <p>(3) References to the moratoria in the sub-paragraph (2) mean restrictions imposed under section 58 (restrictions on works following substantial road works) or section 58A (restrictions on works following substantial road works) or section 58A (restrictions on works following substantial street works) of the 1991 Act.</p> <p>(4) Without restricting the undertaking recourse to any of the alternative appeal mechanism which may be available under the relevant permit scheme or to grant a permit or otherwise, the undertaker may appeal any decision to refuse to grant a permit or to grant a permit subject to conditions pursuant to the permit scheme in accordance with the mechanism set out in Schedule 16 (procedure for discharge of requirements) of this Order.</p>
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	<p>Schedule 16 (procedure for discharge of requirements) of this Order.</p> <p>"relevant permit scheme" means the Lincolnshire Permit Scheme for Road Works and Street Works Order 2016 or the Nottinghamshire County Council Permit Scheme Order 2020 which are made under Part 3 of the Traffic Management Act 2004, as applicable for the location of the relevant street works;</p>	<p>(5) if, pursuant to paragraph (2) the relevant highway authority fails to notify the undertaker of its decision within the period stated at paragraph (2)(c), beginning on the date on which the application was made, the works are deemed to be “immediate works” for the purposes of the relevant permit scheme.</p> <p>(6) Any application to which this article applies, must include a statement that the provisions of paragraph (5) apply.</p> <p>(7) Where there is no relevant permit scheme that is validly in place across the Order limits, then article 10 (application of the 1991 Act) shall apply.</p> <p>"relevant permit scheme" means the <del>Lincolnshire Permit Scheme for Road Works and Street Works Order 2016 or the</del> Nottinghamshire County Council Permit Scheme Order 2020 <del>as varied by the Nottinghamshire County Council (variation of a Permit Scheme) Order 2025</del> which <del>are-is</del> made under Part 3 of the Traffic Management Act 2004, as applicable for the location of the relevant street works;</p>
<p>REP4-001/13</p>	<p><b>ISH3 AP4: COMMENTS ON THE ADDITIONS OF PARAGRAPHS (4) TO (7) TO ARTICLE 10 (POWER TO ALTER LAYOUT, ETC., OF STREETS) ADDED BY THE APPLICANT</b></p> <p>Without the additional text proposed by the Applicant, the undertaker could alter unlisted streets without needing approval. With the extra paragraphs included, the undertaker may alter unlisted streets only with the street authority’s consent, or after 6 weeks if there is no response (deemed consent). This additional text is considered necessary. However, NCC maintains that the works to the listed streets in Schedule 4 should be subject to technical design approval to ensure their</p>	<p>The Applicant notes NCC’s position regarding street works listed in Schedule 4 and is continuing its engagement with NCC to resolve the process for design approval in the oCTMP.</p> <p>The Applicant has responded previously on the appropriateness of the requirement proposed by NCC.</p> <p>The oCTMP has been updated (document reference EN010163/EX/6.3.14 Appendix 13.2 Rev 2, March 2026) to reflect the requests from NCC <b>[REP4-001]</b> REP4-001/15 Item 1) (a – f) and Item 2). This gives the required assurances that the required details and relevant guidance will be adhered to at the appropriate design stages. It has included a commitment to ongoing liaison with stakeholders including NCC Traffic Liaison Group to discuss and agree Streetworks and access design.</p>

	<p>safety prior to implementation; it does not accept that the order should grant power to alter the listed streets without necessary verification from the Highway Authority. NCC requests that any alterations to the layout of the adopted highway or creation of accesses within the adopted highway pursuant to Article 10 (power to alter streets) and Article 11 (access to works) of Part 3 (Streets) are subject to full technical approval from the Highway Authority (HA), with the costs to the HA to be covered by the developer.</p>	
<p>REP4-001/14</p>	<p>NCC would wish to see a specific requirement included at Schedule 2, or an obligation integrated within the Outline Construction Traffic Management Plan which would ensure that the safety of the proposed works is demonstrated and approved by the HA prior to those works being undertaken. It is standard practice for this procedure to be outlined within the CTMP (see for example Springwell Solar Project REP4-028). However, the preference of NCC is for this to be set out within a separate requirement with details of fees outlined in the Procedure for Discharge of Requirements.</p>	
<p>REP4-001/15</p>	<p><i>1) No construction works shall be undertaken in the adopted public highway until the detailed design of those works has been submitted to and approved in writing by the county authority including:</i></p>	

	<p><i>A programme for the works, details of the construction method and traffic management requirements;</i></p> <p><i>a) A detailed design pack of drawings and specifications detailing the works and any service / utility works that may need to be accommodated, informed by additional surveys including topographical surveys and additional speed survey data;</i></p> <p><i>b) The necessary health and safety information required under the Construction, (Design &amp; Management) Regulations, or their equivalent at the point of submission;</i></p> <p><i>c) Details of the proposed contractor, including their insurance provisions;</i></p> <p><i>d) If required by the county authority the appropriate stage Road Safety Audit (RSA)</i></p> <p><i>e) Details of any necessary road signage and road markings; and</i></p> <p><i>f) Details of any proposed remediation proposals should the works not be permanent.</i></p> <p><i>2) The authorised development must be carried out in accordance with the approved details.</i></p>	
<p>REP4-001/16</p>	<p><b>ISH3 AP8: UPDATE ON POSITION REGARDING SECURING AN INDEPENDENT DESIGN REVIEW PROCESS TO INPUT INTO THE DETAILED DESIGN. ALSO, PROVIDE DETAILS ON HOW THE LOCAL COMMUNITY WOULD BE CONSULTED AND COULD ENGAGE ON DETAILED DESIGN PROPOSALS.</b></p>	<p>The Applicant understands from NCC’s written position that NCC are not advocating for an independent design panel. The position stated here is as per NCC’s response to ExQ1 [REP2-062], therefore the Applicant would repeat its comments as per row REP2-062/3 of [REP3-039]. The Applicant is unaware of any further correspondence from NCC setting out why its position at Deadline 3 is not accepted.</p>

	<p>The County Council maintains its previous position on the topic of independent design review (made in response to ExQ1 Q 4.0.04). It has not however had opportunity to discuss this with Bassetlaw District Council who may have a different perspective.</p> <p>It is not considered essential for the dDCO to mandate a formal independent design review process, provided that robust design controls are secured through Requirements relating to:</p> <ul style="list-style-type: none"> <li>• Detailed design and layout.</li> <li>• Materials and colour treatment.</li> <li>• Landscape mitigation and long-term management.</li> <li>• Construction compounds, access routes and site management.</li> </ul>	
<p>REP4-001/17</p>	<p>The imposition of a mandatory independent design review panel may introduce uncertainty regarding how recommendations would be implemented, enforced or weighed against any statutory approval process. However, where key components of the scheme remain subject to post-consent design development, the Councils acknowledge that an independent design review group may add value, provided that:</p> <ul style="list-style-type: none"> <li>• Any review process is advisory rather than determinative.</li> <li>• The scope, timing and remit of the review are clearly defined.</li> </ul>	

	<ul style="list-style-type: none"> <li>• The Councils are engaged in the process, including agreement of the brief.</li> <li>• Any recommendations are capable of being secured through subsequent Requirement approvals.</li> </ul> <p>It is important that, should an independent design review be undertaken, its findings are clearly documented and form part of the decision-making context for any subsequent approvals.</p>	
<p>REP4-001/18</p>	<p>We consider that, while the Proposed Development does not necessarily require mandatory independent design review, certain components could benefit from additional design scrutiny, particularly where final solutions are yet to be confirmed and where landscape and visual effects may be influenced by detailed design choices. These components may include</p> <ul style="list-style-type: none"> <li>• Large above-ground built elements, such as substations, where scale, massing, form, materials and colour treatment will have a strong influence on landscape and visual effects.</li> <li>• Construction compounds and temporary works, where mitigation is inherently difficult to implement effectively, particularly in relation to: Proximity to residential receptors of high sensitivity; Visual intrusion arising from plant, materials storage and welfare facilities; and access routes and vehicular movements affecting existing vegetation and landscape features; and</li> </ul>	

<p>REP4-001/19</p>	<p>Landscape mitigation measures, including landform, bunding, boundary treatments and structural planting, where long-term integration with the receiving landscape is critical.</p> <p>In terms of community involvement, the process of discharge of requirements of such large-scale development would be expected to be subject to a process of public consultation, where appropriate, to accord with the process for TCPA reserved matters applications, in order that local councils and individuals might be sighted and have opportunity to comment on the submitted documents. We anticipate that design matters and discharge of requirements will be dealt with by Bassetlaw DC until succeeded by the proposals for unitary authorities in Nottinghamshire.</p>	<p>The Applicant strongly disagrees with the suggestion that discharge of requirements be subject to a process of public consultation. The Applicant is unaware of any other DCO where such a process is secured. Consultation on discharge of requirements is a matter for statutory consultees on matters related to their statutory functions. It is not appropriate to conflate the concept of a discharge of requirement, to the application for reserved matters. The two are fundamentally distinct concepts. The imposition of public consultation for discharge of requirements has no basis in law or guidance and would present a significant risk to programme delay. The fact that the discharge of requirements is principally based on outline documents presented in examination means that the public are given, in the examination, the opportunity to comment on the plans that will form that basis of the detailed management plans subject to final sign off. This means that there is already an element of public engagement and consultation. It is the local planning authorities role to ensure that at discharge of requirements, the management plans are achieving the mitigation stated it is required to achieve at examination. This technical approval process does not require, and would be inappropriate to consider, a broad public approval basis.</p> <p>There is no public consultation involvement in the discharge of planning conditions, which are the mirror regime under the TCPA process.</p> <p>Therefore, the Applicant would strongly resist any suggestion that public consultation is required for the discharge of requirement.</p>
<p>REP4-001/20</p>	<p><b>ISH3 AP12: NCC TO CONFIRM WHETHER ANY OTHER MADE DCO'S HAVE IDENTIFIED OTHER APPROPRIATE BODIES FOR DISCHARGING DETAILS SUBMITTED UNDER REQUIREMENTS WHERE DIFFERENT REMITS EXIST BETWEEN AUTHORITIES.</b></p> <p>The County Council was asked to provide evidence of discharging responsibilities to be separated into the authorities in two tier areas responsible for that matter. It is standard</p>	<p>The Applicant notes the position taken on other Orders, but remains of the view that unless that matter relates to a function specifically ascribed to a county planning authority, that it remains appropriate for the matter to be discharged by a district planning authority in consultation with a county council where appropriate.</p> <p>Fundamentally, it is not clear why items such as “surface and foul water drainage” should be discharged by a county planning authority rather than district planning authority. Whilst NCC as county council hold responsibility as lead local flood authority, this does not mean they are the</p>

	<p>practice in two tier areas for discharging responsibility to be separated into the relevant planning authority. This ensures that the discharge of requirements goes straight to the responsible authority and avoids any delay caused by sending matters relevant to the County Council to the District Council involving further consultation.</p> <p>This was applied on the consented schemes in Lincolnshire and is also agreed for One Earth Solar Project and the Great North Road Solar Project, currently at examination stages</p>	<p>county planning authority for those matters. Equally with matters relating to highways. Absent a clear justifying criteria for the responsibility to pass to NCC, the Applicant is of the view that there is equal claim to responsibility between NCC and BD.</p> <p>The Applicant acknowledges that pursuant to paragraph 1(1) of the TCPA 1990, that the county planning authority would be capable of discharging requirements as county planning authority, however, with a view of ensuring that responsibility for discharge falls at a local level, and is consistent across the Scheme, the Applicant remains of the view that the dDCO as drafted appropriately divides responsibilities for approval and consultation between BDC and NCC.</p> <p>However, if NCC are strongly of the view that it would be more appropriate for the county planning authority to discharge these requirements as a whole, which does occur on DCOs, then the Applicant would be happy to reverse the roles of NCC and BDC so that NCC are the discharging authority for all matters, with BDC having a consultation role.</p> <p>The key point is that there is no reason to have a split approach, which would not be justified in the statutory functions of the relevant parties. However, the Applicant can see the merit in shifting all discharge functions in Schedule 2 to NCC.</p>
<p>REP4-001/21</p>	<p>See below extract from the Tillbridge Solar Order made October 2025 at bottom of page:</p>	<p>The Applicant acknowledges that pursuant to paragraph 1(1) of the TCPA 1990, that the county planning authority would be capable of discharging requirements as county planning authority, however, with a view of ensuring that responsibility for discharge falls at a local level, and is consistent across the Scheme, the Applicant remains of the view that the dDCO as drafted appropriately divides responsibilities for approval and consultation between BDC and NCC.</p> <p>However, if NCC are strongly of the view that it would be more appropriate for the county planning authority to discharge these requirements as a whole, which does occur on DCOs, then the Applicant would be happy to reverse the roles of NCC and BDC so that NCC are the discharging authority for all matters, with BDC having a consultation role.</p> <p>The key point is that there is no reason to have a split approach, which would not be justified in the statutory functions of the relevant parties. However, the Applicant can see the merit in shifting all discharge functions in Schedule 2 to NCC.</p>
<p>REP4-001/22</p>	<p><b>ISH3 AP13: EXPLAIN FURTHER HOW THIS PARAGRAPH COULD SET OUT HOW FEES COULD BE SPLIT BETWEEN DIFFERENT LOCAL AUTHORITIES INVOLVED WITH THE DISCHARGING PROCESS AND WHETHER THIS HAS BEEN ACCOMMODATED ON ANY OTHER MADE ORDERS.</b></p> <p>The County Council considers if the DCO recognises the County Council as a local planning authority for specific discharges (eg as set out in the Tillbridge DCO), fees are therefore payable to</p>	<p>Noted.</p>

	the relevant LPA by virtue of Schedule 2 para 31 and this would not need to be changed.	
REP4-001/23	<p><b>ISH3 AP15: PARTIES TO ADVISE ON HOW IMPROVED ENGAGEMENT WITH LOCAL RESIDENTS WILL BE TAKEN FORWARD.</b></p> <p>The County Council has long experience of requiring and establishing community liaison groups where mineral development is occurring near local communities. There is already an established Quarry Liaison Group for the approved Sturton le Steeple sand and gravel quarry which following initial commencement some years ago has been transferred to another operator and is due to commence sand and gravel extraction in June 2026.</p>	<p>The Applicant has considered the representations made by Sturton le Steeple Parish Council and Nottinghamshire County Council regarding community liaison.</p> <p>The Applicant considers that the dDCO does not need to be further amended to provide greater security for community liaison. The Applicant has already considered this within the requirements. Requirement 7(4)(a) states that the detailed CEMP for each phase of the authorised development must provide details of community liaison. The oCEMP does not contain a large amount of information at this stage as to what the strategy for community liaison will look like, but due to the explicit requirement set out in requirement 7(4)(a), the approving authority (being currently Bassetlaw District Council), will ensure that they are content with the final plans for community liaison.</p> <p>Community liaison is not equal to consultation, which carries with it an expectation on the part of the applicant for adjustments and amendments. However, the community liaison function will ensure that there are open lines of communication between the undertaker and community, for the community to raise concerns or for the undertaker to provide information about development progress. The undertaker will always be able to take information received during those sessions on board as part of its discharge process, for example if changes occur on the highway system then it can amend the CTMP to align with that but it is not appropriate for the plans themselves to be discharged by public committee. These discharges will need to be done by professional, and statutory authorities.</p> <p>It should be noted that the Order cannot require the undertaker to establish a wider multi-party community liaison group. Whilst the Applicant supports this approach, and would be keen to work with the County Council on this, such a requirement would seek to impose a duty on the undertaker</p>
REP4-001/24	The County Council supports any requirement being placed upon a DCO that the owner of the consent should initiate or actively participate in a local community liaison group. However, where such a group already exists to deal with similar developments, there should be an requirement to work with the LPA and join any grouping established by the local planning authority for the purpose of liaising with the local community during the construction and operation of project for whatever period is deemed appropriate.	
REP4-001/25	Given that there are multiple NSIP schemes within the Sturton and North Leverton area at differing stages of consideration,	

	together with TCPA consents requiring ongoing community liaison, the County Council would support the concept of a wider single liaison group becoming established at which representatives of relevant projects in the Sturton and North Leverton areas could jointly participate to liaise with the community representatives at the appropriate time and avoid the need for multiple individual groups being formed.	which it does not have control over to fulfil. The undertaker has no powers of compulsion to secure the engagement of other parties in a multi development community liaison group, and therefore the requirement itself can't stipulate this as a mandatory characteristic of the group. The Applicant will, however, work with local authorities to understand how it can support a multi-party approach to ease the burden of engagement on local residents.
REP4-001/26	With the forthcoming local government re-organisation into unitary authorities, it is likely that a single authority will be involved in co-ordinating this liaison activity going forward after 2028, but in the meantime, the County Council is approaching Bassetlaw District Council to discuss this matter and will also wish to discuss further with the local Councils.	

**Table 2-2: Sturton-le-Steeple Parish Council**

ID	Verbatim Comment	Applicant Response
REP4-002/1	Regarding commitments made, what guarantees are there that monitoring will occur post construction. The quarry goes into production may26, 200 hgv movements per day, cumulative impact on all fronts. Traffic management plan considering revised speed limits, road markings, interactive speed signs, review to include STEP fusion, quart RES and other stakeholders.	An Outline Construction Traffic Management Plan (oCTMP) <b>[REP3-011]</b> confirms in chapter 4 (site access arrangements) on pages 10-20 that the Applicant seeks to minimise the impact on the local highway network and secures the use of internal haul routes, a minibus strategy for workforce transport, and a restricted routing strategy (from the north that avoids accessing villages to the south) for construction traffic. A comprehensive set of mitigation measures will also be implemented to address any residual impacts.  Mitigation measures during the construction phase include:

		<ul style="list-style-type: none"> <li>• Ongoing monitoring and enforcement of the approved arrangements by the Applicant to ensure adherence to designated routes and site management protocols;</li> <li>• Measures to manage and coordinate construction traffic to minimise impact on local highways and residents; and</li> <li>• Measures to ensure safety and operational efficiency of the construction route.</li> </ul> <p>Requirement 8 of the dDCO <b>[REP3-005]</b> states that no phase of the authorised development can commence until a construction traffic management plan covering that phase, prepared in accordance with the oCTMP <b>[REP3-011]</b> has been submitted to and approved by the local planning authority in consultation with the highway authority.</p>
REP4-002/2	Regarding North Leverton Windmill I asked the cost in MW or % of project, removing the field might be RES are very hard nosed and not giving any ground.	Noted.
REP4-002/3	Mitigation measures are suggested, but there is no meat on the bones, we are concerned about impacts on the village, RES speaks of impacts on the project. The PC agree with all the concerns regarding health and welfare, if granted you won't see all these lawyers and specialists for smoke.	Please see the Applicant's response to REP4-002/1 above.
REP4-002/4	Regarding battery storage RES say the have spoken to the Notts Fire service for advice. I am yet to be convinced that NFS or anyone else has expertise in this newly emerging technology, there seems to be very little regulation or guidance. The above are comments made by me in the consultation	A revised Outline Fire Management Layout Plan <b>[REP2-006]</b> and a revised Outline Fire Risk Management Plan (oFRMP) <b>[REP2-029]</b> were submitted at Deadline 2. The oFRMP details how the proposed development complies with National Fire Chief Council ('NFCC') Guidance. Appendix B of the oFRMP is tabulated and specifically details NFCC Recommendations Cross-Referenced to the proposed BESS Layout and Design.

		<p>The Applicant has been engaged with Nottinghamshire Fire and Rescue Service regarding a SoCG since November 2025 and has submitted an unsigned SoCG with Nottinghamshire Fire and Rescue Service at this Deadline.</p> <p>Requirement 10 of the dDCO [REP3-005] secures a detailed Fire Risk Management Plan (FRMP) that must be approved by the local planning authority prior to commencement, with Nottinghamshire Fire and Rescue Services secured as a consultee. The detailed FRMP must accord with the outline FRMP [REP2-029] that has been submitted into examination for comment.</p> <p>With regards the BESS, principal matter NFR3 on pages 9 to 12 of the SoCG with Nottinghamshire Fire and Rescue Service demonstrates the Applicant has had regard to NFCC guidance as well as engaged with Nottinghamshire Fire and Rescue Service.</p>
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**Table 2-3: Sturton-le-Steeple Parish Council**

ID	Verbatim Comment	Applicant Response
REP4-003/1	<p>Further to our earlier written representations and the Statement of Common Ground there are no areas of agreement. We continue to remain strongly opposed to the applicant on the following areas of concern;</p> <ol style="list-style-type: none"> <li>1) Noise</li> <li>2) Cumulative Impact</li> <li>3) Landscape and Visual Amenity</li> <li>4) Historic Environment</li> <li>5) BMV Agricultural Land</li> </ol>	<p>The Applicant notes these areas of concern.</p>

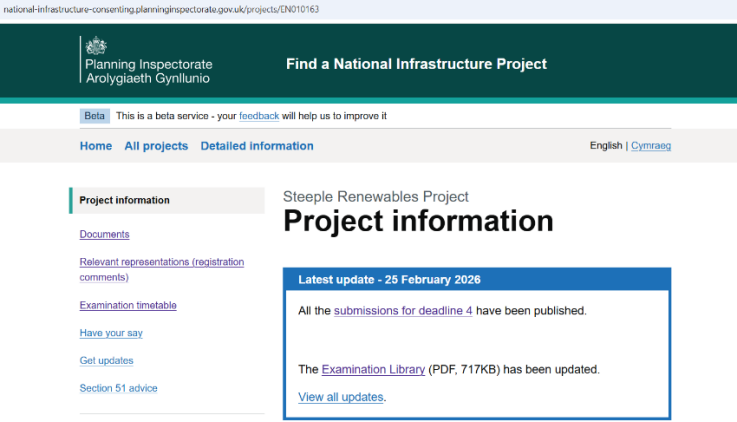
	6) Health and Wellbeing	
REP4-003/2	<p><b>Applicant Responses to ExA First Written Questions (EN010163-000365-8.11)</b></p> <p>A review of the Applicant’s responses to the Examining Authority’s First Written Questions indicates several recurring concerns regarding the quality, clarity, and cooperativeness of the submissions. In many instances, the Applicant does not directly address the question posed. Instead, responses frequently redirect stakeholders to other documents—often without clear signposting—resulting in unnecessary additional work for all parties and hindering efficient examination of the issues.</p>	The Applicant notes the concerns raised.
REP4-003/3	<p>The tone and approach of the responses can be characterised as overly rigid and unconstructive. When asked whether they are willing to undertake further work to meet the needs of affected stakeholders, the Applicant consistently adopts a narrow interpretation of what they consider “necessary,” even where additional work would provide tangible benefits to the local community or other interested parties.</p>	The Applicant notes this comment.

<p>REP4-003/4</p>	<p>The former agricultural buildings, now listed and converted, were dismissed in the hearing as “new houses with windows in the roof”. These properties are considered listed by curtilage association. As such, they are automatically given the same protection as the principle listed building, both in terms of statutory protection from alteration without authorisation (i.e. Listed Building Consent is needed), and also in protection with respect to the relevant planning policies and legislation when assessing planning proposals.</p>	<p>The Applicant confirmed at Issue Specific Hearing 2 (see Transcript of Issue Specific Hearing 2 (ISH2) - Part 5 [EV7-011]) ( the converted agricultural buildings present as modern converted barns with rooflights, new windows and openings (i.e. these former barns never had windows as they didn’t need them for their former agricultural use).</p> <p>The Applicant has addressed the curtilage listed point with regards to Crow Farm at reference RR-052/14 on pages 23 and 24 of Applicant’s Comments on Relevant Representations [REP1-008].</p> <p>For ease of reference the Applicant stated:</p> <p><i>With regard to the Grade II Listed Crow Tree Farmhouse, A review of the planning history for the former range of agricultural buildings (comprising Oak Barn, Pond House, and Millers Barn) demonstrates that the Local Authority have previously identified these structures to be Curtilage Listed in association with Grade II Listed Crow Tree Farm, under Section 1(5) of the 1990 Act. This results from the date of the former agricultural buildings and their historic associative connection with Crow Tree Farm. This legal classification does not, however, result in the buildings being statutorily designated in their own right, nor of being of equal significance to Crow Tree Farm. Furthermore, when considering potential impacts on the Curtilage Listed structures, the consideration should be whether such change (be that physical or via a change in ‘setting’ ) alters the contribution which they make to the designation as a whole. In this context, the rationale behind the designation is the architectural and historic interest of the physical fabric of Crow Tree Farm. The former range of buildings were converted into residential dwellings c.2000 and are no longer ancillary to Crow Tree Farm in regard to their use, nor are they within the same ownership. The new residential dwellings each have their own clearly demarcated domestic demise, and the grouping reads separately to that of Crow Tree Farm, which is also situated within its own defined demise. Accordingly, the legible connection between Crow Tree Farm and the former buildings can be considered to have diminished. Collectively, the range of former farm buildings are recorded as modern house by the Nottinghamshire Historic Environment Record</i></p>
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		<p><i>(HER) and this is referenced (ref. MNT24869) in the relevant table in Appendix 1 of ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]. The Grade II Listed Crow Tree Farm is included within Appendix 1 of the Cultural Heritage Technical Baseline and was considered but was not taken forward for further assessment. The building is currently in use as a residential property and is best appreciated from its immediate vicinity, with the building 's primary façade facing northwards towards Station Road. The key elements of the asset 's setting are considered to comprise the associated gardens and paddocks to the south, the historically associated agricultural buildings and, to a lesser degree, the immediately surrounding agricultural land to the south, which provides rural context to this former farmhouse. All these elements will be unaffected by the Proposed Development.</i></p>
<p>REP4-003/5</p>	<p>Some responses rely on assurances that certain activities cannot commence until the Local Planning Authority (LPA) has approved relevant plans. This presents a significant risk to our community. Bassetlaw District Council has chosen not to participate in the examination process, raising concerns that they may be insufficiently informed or engaged when required to approve critical documents. This increases the likelihood that the Applicant will be permitted to proceed without adequate scrutiny or safeguards.</p>	<p>The Applicant notes the concerns raised. The discharge of requirements is within the statutory functions of Bassetlaw District Council and therefore the Applicant is content that it is appropriate for this authority to discharge requirements as the district planning authority.</p>
<p>REP4-003/6</p>	<p><b>Consultation</b></p> <p>The Applicant's consultation activities appear to have been conducted at a surface level, meeting only the minimum statutory requirements. While community views were collected, there is little evidence demonstrating how this</p>	<p>The Consultation Report [APP-047 to APP-055] and ES Chapter 2: Environmental Impact Assessment Methodology and Public Consultation [APP-060] clarifies consultation undertaken by the Applicant.</p> <p>The submitted Consultation Report [APP-047] outlines how extensive and wide-ranging community and stakeholder engagement was for the project.</p>

	<p>feedback influenced or shaped the evolution of the project design.</p> <p>Furthermore, the Applicant frequently cites various documents in response to questions, yet these references are often difficult to trace or verify. This lack of transparency undermines confidence in the assurances being provided and complicates efforts to assess compliance with relevant legislation and policy.</p>	<p>Section 4 of the 5.1 Consultation Report <b>[APP-047]</b> provides a Statement of Community Consultation (SoCC) that has taken place. Section 5 of the same document details statutory consultation that has also been undertaken. This includes consultation documents (section 5.11), feedback channels (5.13), public consultation events (5.14), advertisement and publicity of consultation events (5.15), engagement with seldom heard groups (5.16), stakeholder meetings (5.17) and adherence with SoCC (5.18). This has ensured positive community (and land rights) engagement has taken place. Feedback has been considered and helped to shape the Proposed Developments design.</p> <p>Section 5 (Design Evolution) in particular paragraphs 5.8 to 5.10 on pages 24 to 26 and Section 6 (The DCO Design Approach, Masterplan and Works packages) in particular paragraphs 6.6 and 6.7 on page 28 of the Design and Access Statement <b>[APP-184]</b> set out how views from the local community have been considered in terms of the proposals design.</p> <p>Under Section 55(4)(b) of the Planning Act 2008 (PA2008) the Planning Inspectorate, on behalf of the Secretary of State, must take any adequacy of consultation representation (AoCR) received from a local authority consultee into account when deciding whether to accept an application for development consent.</p> <p>An AoCR is defined in s55(5) in PA2008 as “a representation about whether the applicant complied, in relation to that proposed application, with the applicant’s duties under sections 42 (duty to consult), 47 (duty to consult local authority) and 48 (duty to publicise)”.</p> <p>12 local planning authorities were consulted by the Planning Inspectorate, including host authorities Bassetlaw District Council and Nottinghamshire County Council <b>[AoC-001]</b> to <b>[AoC-012]</b>. All 12 confirmed they agree that the Applicant complied with sections 42 (duty to consult), 47 (duty to consult local authority) and 48 (duty to publicise).</p>
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<p>REP4-003/7</p>	<p>Reasonable suggestions from residents and from Nottinghamshire County Council—particularly those aimed at mitigating impacts on local communities—have often been dismissed or inadequately addressed. This pattern suggests an unwillingness to meaningfully involve the community in the development process.</p>	<p>A draft SoCG between the Applicant and Nottinghamshire County Council <b>[REP4-032]</b> was submitted at Deadline 4.</p> <p>Principal matter reference NCC 10 specifically covers “Impacts on Local Communities”.</p> <p>The Applicant considers that impacts to local communities have been considered within relevant chapters of the Environmental Statement <b>[APP-058 to APP-075, REP2-018, REP2-020, REP3-009]</b> with safeguards to the local community through varied phases of development secured by the outline Construction Environmental Management Plan (oCEMP) <b>[REP3-011]</b>, outline Operational Environmental Management Plan (oOEMP) <b>[REP3-015]</b> and outline Decommissioning Plan (oDP) <b>[REP3-013]</b>.</p> <p>The outline Construction Traffic Management Plan (oCTMP) <b>[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>Requirements 7 (CEMP), 8 (CTMP), 9 (OEMP) and 21 (Decommissioning and Restoration) of the dDCO <b>[REP3-005]</b> secure further details of each plan.</p> <p>Nottinghamshire County Council have confirmed agreement that relevant chapters of the ES and sections of the oCEMP have considered impacts to the local community and requirements of the dDCO secure further details of each plan.</p>
<p>REP4-003/8</p>	<p>Furthermore, the Applicant frequently cites various documents in response to questions, yet these references are often difficult to trace or verify. This lack of transparency undermines confidence in the assurances being provided and complicates efforts to assess compliance with relevant legislation and policy.</p>	<p>All of the documents and plans submitted by the Applicant (and other parties) as part of the Steeple DCO application are publicly available to view on the Planning Inspectorates website.</p> <p>The Examination Library (a navigation tool), produced and updated by the Planning Inspectorate on their website throughout the examination process, confirms reference numbers for each</p>

		<p>document/plan (provided by the Applicant and other parties) and a hyperlink specifically to each document.</p>  <p>The Applicant has ensured that examination library references are used when it refers to documents to ensure ease of reference for all parties.</p>
<p>REP4-003/9</p>	<p><b>Process at Hearings</b></p> <p>During hearings, the Applicant regularly uses technical jargon and directs participants to other documents rather than providing clear, accessible answers. This undermines the ability of community members to engage fully in the process. Concerns have also been raised regarding the consistency with which procedural rules are applied during hearings. Observations include:</p>	<p>The Applicant notes this comment.</p>

	<ul style="list-style-type: none"> <li>• Significant variation in the amount of speaking time afforded to different participants, with some speakers receiving extended opportunities while others are encouraged to conclude prematurely.</li> <li>• Community participants have been reprimanded for their language, whereas the Applicant has been permitted to make provocative or inflammatory remarks without challenge (we will outline full details within our formal complaint).</li> </ul> <p>These issues collectively contribute to a sense that the process is not being applied evenly or transparently.</p>	
<p>REP4-003/10</p>	<p><b>Recommendations</b></p> <p>We respectfully request that the Examining Authority recommend to the Secretary of State that the Steeple Renewables NSIP <b>not</b> be granted development consent.</p> <p>However, if consent is granted, we strongly call for the following safeguards:</p>	<p>The Applicant notes this comment.</p>
<p>REP4-003/11</p>	<p><b>1. Independent Design Review</b></p> <p>A fully independent design review process with meaningful, structured community involvement that demonstrably influences the final design.</p>	<p>The design of the equipment for the temporary Proposed Development is driven by its functionality as solar infrastructure, which means there is limited scope for altering its form or aesthetic. For this reason, an independent design review process would not be appropriate or beneficial.</p> <p>The design process for the scheme has involved a Design and Access Statement <b>[APP-184]</b>, which explains how guidance has informed the design process undertaken for the DCO proposal. The guidance includes Climate People Places Value – Design Principles for National Infrastructure</p>

(2020), which also informed the Planning Inspectorate guidance note on Nationally Significant Infrastructure Projects: Advice on Good Design (2024).

ES Appendix 4.5 Outline Design Principles [APP-093] sets out the design principles that have guided the Proposed Development. In addition, ES Chapter 3 [APP-061] includes a section on the iterative design process and confirms that the Proposed Development has evolved iteratively, taking into account environmental effects, planning and environmental policy objectives, and the functionality of the Proposed Development.

A Design Approach Document [AS-010] has also been prepared, which consolidates good design and the design principles applied to the Proposed Development for ease of reference.

The design process has focused on sustainability and there has been an emphasis on the social and environmental aspects of design rather than architectural aesthetics, given the lack of flexibility in the appearance of much of the infrastructure.

In conclusion, the design process has been thorough and proportionate to the scale of the development. Given the limited scope for altering the design of the development components themselves, an independent design review process would not add value and is therefore not considered necessary.

Post consent, Requirement 3 (detailed design approval) of the dDCO [REP3-005] secures that additional design details before any phase of the Proposed Development commences must be agreed with the local planning authority. In particular, sub-paragraph (2) of Requirement 3, confirms these details must accord with design parameters and principles. Sub-paragraph (3) of Requirement 3, confirms the authorised development must be carried out in accordance with the approved details.

		<p>Nottinghamshire County Council have confirmed they consider an independent design review to not be required, and the Applicant has responded on this point in its responses to Nottinghamshire’s Deadline 4 submissions, being their responses to actions points at ISH2/ISH3.</p>
<p>REP4-003/12</p>	<p><b>2. Construction Traffic Management</b></p> <p>A formal role for community representatives in developing the Construction Traffic Management Plan, ensuring it accounts for the cumulative impact of multiple concurrent developments in the area.</p>	<p>Paragraphs 6.7 to 6.9 on page 28 of the outline Construction Traffic Management Plan (oCTMP) <b>[APP-129]</b> confirms responsibilities for the oCTMP as follows:</p> <p>The contractor that is appointed to carry out the development works will introduce measures to minimise the effect on the local highway network resulting from construction activities as necessary. These will be managed by the Project Manager and the Site Manager.</p> <p>The Site Manager will assume responsibility for the operation of the site. The details of the Site Manager will be provided to Nottinghamshire County Council, the Local Highway Authority in advance of any works being carried out.</p> <p>For the Workforce Travel Plan (discussed in Chapter 8 of the oCTMP) the role of the Travel Plan Coordinator (TPC) is set out and they will engage with local residents throughout the construction phase, as needed.</p> <p>The Applicant also would point to the commitments made in the outline CEMP, and requirement 7(4) of the dDCO which secures that the detailed CEMP for the authorised development must provide details of community liaison. The Applicant is committed to working with local residents, the parish councils and other local authorities to establish a community liaison group. This group would be able to review actions of the undertaker against the steps set out in the management plan. However, approval and consultation of the management plan is a technical matter. The plan will be drafted based on the outline plan provided at examination, and will be approved by the local planning authority in accordance with its statutory functions. It is the role of the local planning authority to ensure that planning harm is mitigated as anticipated in the management plan.</p>

<p>REP4-003/12</p>	<p><b>3. Enhanced Mitigation and Collaboration</b></p> <p>The Applicant must work collaboratively with stakeholders including Nottinghamshire County Council to strengthen mitigation measures and provide clearer assurances relating to:</p> <ul style="list-style-type: none"> <li>• Landscape and visual impact</li> <li>• Historic environment,             <ul style="list-style-type: none"> <li>o Archaeological Mitigation Strategy</li> <li>o Christian heritage and associated tourism</li> </ul> </li> <li>• Integration with Nottinghamshire County Council’s existing highway permit schemes to minimise disruption</li> <li>• Wildlife protection, particularly skylarks and badgers</li> </ul>	<p>The Applicant has engaged with a number of stakeholders with regards mitigation measures were necessary including Nottinghamshire County Council as one of the two host authorities.</p>
<p>REP4-003/13</p>	<p><b>4. Community Liaison Committee</b></p> <p>We recommend establishing a community liaison committee to support partnership working and improve communication between the various developers whose projects collectively affect our community.</p>	<p>The Applicant is committed to working with the local community. requirement 7(4) of the dDCO which secures that the detailed CEMP for the authorised development must provide details of community liaison. Therefore, the detailed CEMP which needs to be approved by the local planning authority prior to commencement of the authorised development will set out the precise operations of the community liaison group.</p>
<p>REP4-003/14</p>	<p><b>Request for Further Comment</b></p> <p>We will submit a separate paper regarding Christian Heritage to answer the question raised by the ExA at ISH2. We request an extension to submit additional comments regarding The Health Impact Assessment.</p>	<p>The Applicant notes that a separate submission was accepted into examination and has responded on this point separately.</p>

**Table 2-4: National Grid Electricity Transmission Plc**

ID	Verbatim Comment	Applicant Response
REP4-005/1	Paragraph 6(2) provides that the Applicant must not acquire any land forming part of the North Humber to High Marnham Project unless otherwise agreed in writing with National Grid Electricity Transmission Plc (" <b>NGET</b> "). The operation of the "agreement in writing" mechanism is governed by the following framework within the Protective Provisions (" <b>PPs</b> "):	<p>The Applicant has no observations to make on the explanation provided by NGET as to how paragraphs 6, 14 and 16 of the NGET proposed protective provisions operate, which accord with the submissions made by the Applicant in the CAH.</p> <p>As to the case made by NGET in support of these protective provisions the Applicant directs the ExA to its written summary of oral submissions at ISH3 [<b>REP4-031</b>] and its s127/138 Report being submitted at D5.</p>
REP4-005/2	(a) Obligation to seek agreement: The Applicant is required to seek NGET's written agreement before acquiring any such land. This reflects the need to protect NGET's ability to deliver the North Humber to High Marnham Project without interference from the Applicant's exercise of compulsory acquisition powers	See above
REP4-005/3	(b) <b>NGET's agreement not to be unreasonably withheld or delayed:</b> Paragraph 6(2) expressly provides that NGET's agreement must not be unreasonably withheld or delayed. This obligation is reinforced by the general duty of co-operation in paragraph 14(2), which confirms that whenever NGET's consent, agreement or approval is required in relation to plans, documents or other information submitted by the Applicant, or the taking of action by the Applicant, it must not be unreasonably withheld or delayed	See above

<p>REP4-005/4</p>	<p>(c) <b>Duty to co-operate:</b> Paragraph 14(1) imposes a positive obligation on both parties to use their best endeavours to coordinate the execution of works in the interests of safety and the efficient and economic execution of the authorised works, taking into account the need to ensure the safe and efficient operation of NGET's undertaking. This duty of co-operation underpins the agreement process and requires both parties to engage constructively</p>	<p>See above</p>
<p>REP4-005/5</p>	<p>d) <b>Dispute resolution:</b> In the event that the parties are unable to reach agreement, the matter can be referred to arbitration. Paragraph 16 provides that any difference or dispute arising between the Applicant and NGET under this Part of the Schedule must, unless otherwise agreed in writing, be determined by arbitration in accordance with the arbitration provisions of the Order. This ensures that neither party can frustrate the process by unreasonably refusing to engage.</p>	<p>See above</p>
<p>REP4-005/6</p>	<p>In summary, the mechanism operates as follows: (i) the Applicant must seek NGET's written agreement before acquiring any North Humber to High Marnham Project land; (ii) NGET must consider any such request and cannot unreasonably withhold or delay its agreement; (iii) both parties are obliged to co-operate and use best endeavours to resolve any issues; and (iv) if agreement cannot be reached notwithstanding these obligations, the dispute can be determined by arbitration, thereby ensuring that the process cannot be indefinitely blocked by either party.</p>	<p>See above</p>

## Applicant Comments on Deadline 4 Submissions

### Steeple Renewables Project

www.steeplerenewablesproject.co.uk

REP4-005/7	<p>NGET accepts that, in principle, neither section 127 nor section 138 is triggered by the PPs sought in respect of NHHM (as distinct from NGET's existing infrastructure and land, in relation to which those provisions are engaged). However, NGET submits that the fact that sections 127 and 138 are not engaged in relation to the future infrastructure PPs is not a reason in principle not to recommend those provisions. The Secretary of State has recently imposed equivalent PPs on two occasions (Awel y Môr and Mona), demonstrating that there is no prohibition on doing so.</p>	<p>The Applicant notes the agreement by NGET that neither s127 or 138 Planning Act 2008 are engaged in respect of future NGET assets. NGET's further submission is addressed in the Applicant's s127/138 Report being submitted at D5.</p>
REP4-005/8	<p>NGET takes engagement with local residents and other stakeholders very seriously, both in relation to its own projects and its interactions with other projects. This extensive engagement and working with the local community is something that NGET is experienced in doing as a responsible statutory undertaker and developer. Indeed, the development of projects such as North Humber to High Marnham does take considerable time in part because of the extensive nature of that engagement work.</p>	<p>The Applicant has no comment to make on this submission.</p>
REP4-005/9	<p>As set out in NGET's Deadline 3 submission (REP3-053) at paragraph 2, NGET has undertaken the following consultation in respect of the North Humber to High Marnham Project:</p> <ul style="list-style-type: none"><li>(a) Non-statutory consultation between 1 June and 27 July 2023;</li><li>(b) Localised non-statutory consultation between 9 July and 6 August 2024; and</li></ul>	<p>ditto</p>

	<p>(c) Statutory consultation between 18 February and 15 April 2025.</p> <p>Following close of statutory consultation in April 2025, NGET made some changes to the draft Order Limits as a result of review of consultation feedback, ongoing stakeholder engagement and assessment work. NGET has therefore undertaken targeted landowner consultation on these changes between 14 January and 11 February 2026. There were also a number of other targeted landowner consultation exercises during 2025.</p>	
REP4-005/10	<p>In addition, NGET has issued regular Community Update Newsletters in Autumn 2024, September 2025 and January 2026, as well as maintaining a project website that is regularly updated and communication channels which remain open and monitored. There has also been informal engagement with landowners and other stakeholders throughout the lifetime of the project.</p>	ditto
REP4-005/11	<p>NGET will continue to provide Community Update Newsletters, maintain an up to date project website and project communication channels through to the submission and examination of its DCO application.</p> <p>As stated in NGETs Outline Code of Construction Practice ("<b>CoCP</b>") published at its NHHM Statutory consultation, NGET will continue engagement and provide updates to local communities during construction of the project. An extract of the CoCP is included as an Annex to this Response<sup>1</sup>. Local residents, landowners and other stakeholders will of course also have an</p>	ditto

	<p>opportunity to participate in the examination of the North Humber to High Marnham DCO</p>	
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**Table 2-5: National Grid Electricity Transmission Plc**

ID	Verbatim Comment	Applicant Response
<p>REP4-006/1</p>	<p><b>Introduction</b></p> <p>1. This written summary of oral submissions at CAH1 is submitted on behalf of National Grid Electricity Transmission Plc ("<b>NGET</b>") in respect of the Development Consent Order ("<b>DCO</b>") application for the proposed Steeple Renewables Project ("<b>Project</b>") made by Steeple Solar Farm Limited ("<b>Applicant</b>").</p> <p>2. NGET owns, operates and maintains the high-voltage electricity transmission network in England and Wales ("<b>NETS</b>"). The transmission system transports large amounts of energy across the country, connecting energy generators with distribution systems which take energy on to homes and businesses across England and Wales. NGET operates under a transmission licence issued by the Office of Gas and Electricity Markets ("<b>Ofgem</b>") and is subject to regulation by Ofgem and to its duties under the Electricity Act 1989.</p> <p>3. These submissions should be read in conjunction with NGET's relevant representation (RR-049), submissions at</p>	<p>In response to the case made by NGET in support of the protective provisions it proposes the Applicant directs the ExA to its written summary of oral submissions at ISH3 [<b>REP4-031</b>] and its s127/138 Report and response to ExQ2 7.21, 7.2.56 and 7.2.7 both of which are being submitted at D5.</p>

	Issue Specific Hearing (" <b>ISH</b> ") 1, submissions at Deadline 2 (REP2-069) and submissions at Deadline 3 (" <b>D3 Submissions</b> ") (REP3-053).	
REP4-006/2	<p><b>Protective Provisions</b></p> <p>4. NGET confirmed that at Deadline 3 it had provided the Examining Authority ("<b>ExA</b>") with a markedup version of the Applicant's suggested protective provisions ("<b>PPs</b>"). The amendments sought by NGET fall into two categories: first, amendments relating to the protection of existing NGET infrastructure (primarily in relation to insurance and security); and secondly, amendments which relate directly to the North Humber to High Marnham project ("<b>NHHM</b>").</p> <p>5. Given that the significant issue in terms of the PPs related to NHHM, NGET addressed the ExA on three preliminary matters of context before turning to the detail of the PP drafting: the need for NHHM; the evolution of the NHHM project; and the principle of imposing PPs in respect of NHHM.</p>	See above
REP4-006/3	<p><b>Need for NHHM</b></p> <p>6. There is an extensive programme of works currently underway to deliver an upgrade of the NETS, known as the Great Grid Upgrade. NHHM is fundamental to that programme and is arguably existential as regards the continuing ability of the United Kingdom to transfer</p>	See above

	<p>electricity from generating stations to consumers. The Great Grid Upgrade is necessitated by the shift from fossil fuel generation to renewable energy sources, both onshore and offshore, and also in terms of interconnectors. It is imperative if the UK is to meet its climate targets and Net Zero 2050.</p>	
REP4-006/4	<p>7. In particular, boundary reinforcement measures are required to improve capacity at what are, in essence, bottlenecks or pinch points in the NETS. As set out in NGET's D3 Submissions, NESO's Electricity Ten Year Statement and the Government's Clean Power 2030 Action Plan both recognise the need for additional boundary capability. There are 17 major projects forming part of the Great Grid Upgrade, of which NHHM is one.</p>	See above
REP4-006/5	<p>8. NHHM is a nationally significant infrastructure project ("<b>NSIP</b>") comprising approximately 90km of overhead line stretching from a substation west of Cottingham down to High Marnham in Nottinghamshire. It will increase capacity at Boundary B8, where the anticipated deficit is 11.7GW. Multiple projects are needed to address that deficit, and NHHM will provide more than 6GW of additional capability across the B8 boundary, a very significant contribution.</p>	See above
REP4-006/6	<p>9. In addition, NHHM will directly enable generation from particular sources. In particular, NHHM is an integral part of the connection offer for Dogger Bank South offshore wind farm. Put shortly, Dogger Bank South, which is expected to</p>	See above

	<p>deliver in the order of 2.9 to 3GW of power, cannot begin generation without NHHM first having been commissioned. The position is further summarised in the D3 Submissions at paragraph 12 and following.</p>	
REP4-006/7	<p>10. NHHM is self-evidently of fundamental national significance and benefits from policy support in the National Policy Statements EN-1 and EN-5 as a critical national priority. Importantly, NHHM is not an aspirational, notional or potential scheme anticipated for medium or long-term delivery. The application for a DCO in respect of NHHM is scheduled for submission in Q3 2026.</p>	See above
REP4-006/8	<p>11. It is, of course, recognised by NGET that the Steeple Renewables Project is itself nationally significant infrastructure which also benefits from policy support as a critical national priority. However, without NHHM, the wider national objective, and indeed legal obligation, of decarbonising UK power generation will be fundamentally undermined. NGET cannot allow this Project, or indeed any project, to frustrate delivery of infrastructure which will provide the capability to connect ten times the amount of generating capacity offered by the Steeple Renewables Project.</p>	See above
REP4-006/9	<p>12. The fact that NHHM is not infrastructure that will serve the Steeple Renewables Project directly, and that there is no functional reliance of the Steeple Renewables Project on</p>	See above

## Applicant Comments on Deadline 4 Submissions

### Steeple Renewables Project

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	<p>NHHM, is nothing to the point. National policy is not concerned with the delivery of only one generating project, but with multiple projects and the necessary infrastructure required to serve them.</p>	
REP4-006/10	<p><b>Evolution of the NHHM Project</b></p> <p>13. NGET has been developing proposals for NHHM for several years. Key milestones are identified in paragraph 2 of the D3 Submissions. Preliminary work was being undertaken in at least 2021 and 2022, prior to the publication of the Strategic Options Report in 2023. Non-statutory consultation took place in June and July 2023. Notably, this was before the Steeple Renewables Project was publicly active; informal consultation on the Steeple Renewables Project began in November 2023. NGET sought engagement with the Applicant at that point.</p>	See above
REP4-006/11	<p>14. NGET has, for a period of years, been seeking to engage with both the Applicant and the landowner, the Sturton Estate. Landowner engagement began in May 2023 and engagement with the Applicant began in November 2023. A schedule of that engagement is set out in the D3 Submissions at paragraph 10.</p>	See above
REP4-006/12	<p>15. Regrettably, engagement with the Applicant has until recently been somewhat frustrating, as the only responses received from the Applicant was that NHHM should avoid the Steeple Renewables Project entirely. That position was not</p>	See above, particularly the Applicant's response to ExQ2 7.2.1 being submitted at D5.

	<p>constructive, as some form of interaction between NHHM and the Steeple Renewables Project was highly likely. More recently, there has been a series of meetings between the development director of the Applicant and the project director of NHHM within NGET, as well as a meeting between engineers on 27 January 2026. Substantive engagement is now taking place, which is all to the good. The regret is that this substantive engagement did not take place earlier.</p>	
REP4-006/13	<p>16. The selection of route alignment for NHHM is a process that has had to address multiple potential impacts, embracing environmental and socio-economic considerations. The interaction with the Steeple Renewables Project is only one of those multiple considerations. The factors upon which the Applicant focuses are, in a sense understandably, somewhat narrow, being concerned with its own commercial interests. NGET's position is necessarily far more complex and nuanced, having regard to a whole range of considerations which NGET has had to take into account when selecting its route alignment. Those considerations are set out in the D3 Submissions.</p>	
REP4-006/14	<p><b>Principle of Protective Provisions in Respect of NHHM</b></p> <p>17. Turning to the principle of PPs in respect of NHHM, NGET is seeking PPs in respect of a significant piece of infrastructure which is not yet constructed. However, the statutory process for NHHM is well advanced and the DCO</p>	See above

	application is due to be submitted in Q3 2026, which is to say before the making of any DCO in respect of the Steeple Renewables Project.	
REP4-006/15	18. NGET has provided the ExA with two precedents where equivalent PPs have been imposed on other DCOs to protect infrastructure not yet constructed, namely the Awely Môr and Mona offshore wind farm DCOs. In truth, however, there is no need for such precedents. NGET submits that irrespective of those precedents, as a matter of sound policy, the PPs sought in respect of NHHM should be imposed, having regard to the critical need for the vital infrastructure which NHHM represents. NPS EN-1 and EN-5 recognise that the infrastructure required to enable the UK to deliver on its climate change obligations and targets is a critical national priority. PPs to safeguard delivery of NHHM represent a sound application of that policy. On that basis, NGET submits that the justification for those PPs is self-evident.	See above
REP4-006/16	19. The response of the Applicant on this point of principle is essentially twofold, and NGET submits that neither element has substance.	See above
REP4-006/17	20. First, the Applicant has said that the Viking CCS DCO provides a precedent for a decision on the part of an ExA and the Secretary of State to refuse to grant PPs in respect of future infrastructure. NGET submits that it does no such thing. The decision in the Viking context was necessarily	See above

	<p>factsensitive. The examination in respect of Viking was conducted during 2024, running from March to September 2024, with the ExA's report dated December 2024. At that time, NGET was seeking PPs in respect of two emerging projects, one of which was NHHM. The position of the applicant in that case, as set out at paragraph 6.8.25 of the ExA's report, was that the submission dates for the DCO applications were still some time away, and that it would therefore be inappropriate for PPs to be included. That position was accepted by the ExA and adopted by the Secretary of State. However, at that time, NHHM had not even commenced statutory consultation. Statutory consultation for NHHM commenced in February 2025. We are now in February 2026. Submission of the DCO application is not a distant prospect; it is a short-term prospect, scheduled for Q3 2026. That is an entirely different proposition from that which confronted the ExA and the Secretary of State when determining the position in respect of Viking.</p>	
<p>REP4-006/18</p>	<p>21. Secondly, the Applicant has said that the Awel y Môr and Mona decisions are distinguishable on the basis that the offshore wind farms in those cases were themselves functionally reliant on the NGET infrastructure proposed to be constructed. Whilst that is factually correct, NGET submits that the distinction is entirely artificial and without relevance to the significance of the matter at issue. The fact that a particular development may or may not be functionally</p>	<p>See above</p>

	<p>reliant on a piece of infrastructure cannot be determinative as to whether or not PPs should be imposed to protect that infrastructure. The determination of that issue must turn on the significance of the infrastructure and</p> <p>the likelihood that it will come forward. NHHM is an extremely significant piece of infrastructure, and it is no longer the distant prospect that it was during the Viking examination in the summer of 2024. In those circumstances, the Awel y Môr and Mona decisions do provide helpful precedent for the principle of PPs being included in respect of future infrastructure. However, NGET goes further and submits that no such precedent is required. It is simply a matter of sound policy. The position in respect of Viking is entirely beside the point and turns on its own facts.</p>	
<p>REP4-006/19</p>	<p><b>Detail and Drafting of the Protective Provisions</b></p> <p>22. Turning to the detail and drafting of the PPs, NGET confirmed that the amendments to the Applicant's suggested PPs which sit outside of the NHHM issue are largely updates by reference to NGET's standard template provisions. These are not bespoke provisions for this particular DCO but are the protections that NGET would seek for its infrastructure in respect of any DCO. The substantive points made by NGET are set out below.</p>	<p>See above</p>

<p>REP4-006/20</p>	<p><b>Paragraph 3 – Interaction with the North Humber to High Marnham Project</b></p> <p>23. This is a new provision which NGET submits should govern the interaction between the Steeple Renewables Project and NHHM. It has been taken in large part from the equivalent provisions in the Awel y Môr and Mona DCOs, adapted to the context of the Steeple Renewables Project.</p>	<p>See above</p>
<p>REP4-006/21</p>	<p><b>Paragraph 6 – Acquisition of Land</b></p> <p>24. Paragraph 6(1) is an existing provision which precludes the exercise of compulsory acquisition powers by the Applicant over existing NGET infrastructure absent NGET's agreement. There is no dispute as to the principle of this provision. NGET has added at paragraph 6(2) an equivalent protection in respect of NHHM, precluding the acquisition of land forming part of the NHHM Site without NGET's prior written agreement. NGET noted two typographical errors in its marked-up version: the reference to "National Grid" should read "National Grid Electricity Transmission Plc", and the reference to "project" should read "Site".</p>	<p>See above</p>
<p>REP4-006/22</p>	<p><b>Paragraph 9 – Retained Apparatus</b></p> <p>25. At paragraph 9(11), a new addition from NGET's standard template requires the undertaker, at all times when carrying out works authorised under the order, to comply with any policies for developing overhead lines and with HSE</p>	<p>See above</p>

	guidance. NGET does not anticipate that this will be controversial.	
REP4-006/23	<p><b>Paragraph 12 – Indemnity</b></p> <p>26. The substantive additional sub-paragraphs are 12(7)(a) and 12(7)(b). The effect of these provisions is twofold. Firstly, there must be acceptable insurance on the part of any undertaker carrying out works within 15 metres of NGET apparatus. Secondly, there must also be a parent company guarantee constituting acceptable security. This is because insurance, whilst it may cover a very substantial amount, is highly unlikely to cover absolutely everything. The financial consequences of damage caused to NGET infrastructure, whether by the undertaker or its contractors, are potentially extremely significant. Accordingly, NGET requires both acceptable insurance and acceptable security to be in place</p>	See above and in particular that in the protective provisions it is proposing at D5 the Applicant has agreed the NGET wording for “ <i>acceptable insurance</i> ” and “ <i>acceptable security</i> ” in respect of this indemnity provision.
REP4-006/24	27. These are standard provisions which NGET seeks in the context of any DCO. To the extent that the ExA wishes to see precedents where these provisions have been included in other DCOs, NGET is able to provide them.	See above
REP4-006/25	<p><b>Agreement of Protective Provisions and Next Steps</b></p> <p>28. NGET acknowledged that, because there has been significant engagement on the NHHM issue, the PPs relating to existing infrastructure have taken something of a backseat. NGET does not anticipate any significant difficulty in reaching</p>	See above

	agreement on the appropriate wording for PPs relating to existing infrastructure within the currency of the examination.	
REP4-006/26	29. As regards NHHM, NGET submits that it would be desirable for the parties to undertake discussions on a without prejudice basis to agree provisional wording for the NHHM PPs, such that if the decision in terms of principle went in NGET's favour, those provisions could be included effectively by agreement; and if the decision were not in NGET's favour, they would not be included.	See above

**Table 2-6: National Grid Electricity Transmission Plc**

ID	Verbatim Comment	Applicant Response
REP4-007/1	<p><b>Introduction</b></p> <p>1. This written summary of oral submissions at Issue Specific Hearing ("<b>ISH</b>") 3 is submitted on behalf of National Grid Electricity Transmission Plc ("<b>NGET</b>") in respect of the Development Consent Order ("<b>DCO</b>") application for the proposed Steeple Renewables Project ("<b>Project</b>") made by the Applicant.</p>	In response to the case made by NGET in support of the protective provisions it proposes the Applicant directs the ExA to its written summary of oral submissions at ISH3 [ <b>REP4-031</b> ] and its s127/138 Report and response to ExQ2 7.21, 7.2.56 and 7.2.7 both of which are being submitted at D5.
REP4-007/2	2. NGET owns, operates and maintains the high-voltage electricity transmission network in England and Wales (" <b>NETS</b> "). NGET operates under a transmission licence	See above

	issued by the Office of Gas and Electricity Markets (" <b>Ofgem</b> ") and is subject to its duties under the Electricity Act 1989.	
REP4-007/3	3. These submissions should be read in conjunction with NGET's relevant representation (RR-049), submissions at ISH1, submissions at Deadline 2 (REP2-069) and, in particular, its submissions at Deadline 3 (" <b>D3</b> ") (REP3-053), which address in detail the matters raised at ISH3.	See above
REP4-007/4	4. ISH3 addressed, under Agenda Item 6, the interaction between the Project and NGET's proposed North Humber to High Marnham project (" <b>NHHM</b> "), including the protective provisions (" <b>PPs</b> ") sought by NGET.	
REP4-007/5	5. NGET's submissions at ISH3 addressed three principal matters:  (a) the extent of interaction between NHHM and the Project;  (b) alternatives and route selection; and  (c) the principle of and justification for PPs in respect of future infrastructure.	See above
REP4-007/6	<b>Extent of Interaction</b>  6. NGET submitted that the extent of the interaction between NHHM and the Project is not as significant as asserted by the Applicant or the landowner. This matter is addressed in detail in NGET's D3 submissions at paragraphs 21 and following.	See above

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REP4-007/7	<p>7. The land affected on a temporary basis amounts to approximately 100 acres, which is less than 5% of the Project's development area. Only 37 acres, representing less than 1.7% of the Project's development area, would be required permanently.</p>	See above
REP4-007/8	<p>8. The Applicant's assertion in its Deadline 2 ("<b>D2</b>") submissions that 124 acres would be sterilised is not accepted by NGET and is not, in fact, evidenced. Of the area said to be "sterilised", some 87 acres (approximately 70%) are acknowledged by the Applicant not to be directly affected by NHHM. Those areas are described by the Applicant as being "stranded" between the proposed NHHM route and the railway line, so as to make them "inefficient" to develop. NGET submits that the term "inefficient" is almost meaningless in this context: the Applicant has not said that development of those areas would be unviable, merely that it would prefer that delivery was not complicated by NHHM. That is understandable, but it cannot be in any sense determinative and should attract very limited weight, given the national imperative that NHHM be delivered.</p>	See above
REP4-007/9	<p>9. NGET further submits that the Applicant's position on the extent of interaction is overstated in three respects. First, in terms of physical extent, the reality of how much land is permanently required is modest, and NGET frequently permits solar panels to be installed underneath and in close</p>	See above

	<p>proximity to overhead lines. Second, in terms of financial loss, the figures used in the Applicant's D2 submissions rely on gross revenue figures for lost generation rather than profit and accordingly cannot be relied upon. Third, in terms of delay, NGET submits that the Applicant's contention that it would miss its grid connection deadline is based on a false premise, namely that NHHM land would be entirely inaccessible from the moment compulsory acquisition powers are activated until NHHM construction is completed. That is simply not realistic.</p>	
REP4-007/10	<p>10. NGET submits that any issues regarding access and construction sequencing are eminently capable of being overcome by discussions and cooperation regarding coexistence. If this presents a problem for the Applicant, it is at present a problem of the Applicant's own making, given that substantive engagement on coexistence has only recently commenced. NGET's D3 submissions at paragraphs 29 to 32 explain the design measures NGET has already proposed in order to minimise land take and disruption. NGET, which is not a commercial competitor of the Applicant, has no interest or incentive in delaying the Applicant's scheme and will pay compensation where required. This point should therefore carry no weight.</p>	See above
REP4-007/11	<p><b>Route Selection and Alternatives</b></p>	See above

	<p>11. NGET submits that the route selection process for NHHM is necessarily a sophisticated and iterative process. The route selection process has had to address multiple potential impacts, embracing environmental, socio-economic and heritage considerations, as well as the programming needs of NGET. The interaction with the Project is only one of multiple considerations and extends for approximately two kilometers of the total 90 kilometer extent of NHHM. The focus of the Applicant and the landowner on their own commercial interests is understandable but necessarily narrow; NGET's position is more complex and more nuanced, as set out in the D3submissions at paragraphs 33 to 48.</p>	
<p>REP4-007/12</p>	<p>12. NGET notes that, contrary to what was suggested at the hearing by the landowner, NGET has engaged with both the Applicant and the landowner (the Sturton Estate) for a considerable period of time. Engagement with the Applicant began in November 2023, only a month after the Project was made public, and engagement with the landowner began in May 2023. The schedule of engagement is set out at paragraph 10 of the D3 submissions. The engagement with the Applicant was, however, frustrating, since the only response from the Applicant had, until recently, been that NHHM should avoid the Project entirely. There was no substantive engagement by the Applicant as to coexistence until 2026.</p>	<p>See above</p>

<p>REP4-007/13</p>	<p>13. The evolution of the route selection demonstrates that NGET has considered multiple alignment options in the vicinity of the Project. In 2023, the Corridor Preliminary Routeing and Siting Study identified four corridors across the 90 kilometre route; the graduated swathe for the preferred western corridor overlapped the Project, although at that time the Project was not in the public domain. In July 2024, a localised consultation identified an eastern corridor as a potential alternative. In February 2025, the route shown at statutory consultation drew from both the eastern and western corridors.</p>	<p>See above</p>
<p>REP4-007/14</p>	<p>14. In respect of the change requests made by the Applicant and the landowner, NGET submits as follows:</p> <p style="padding-left: 40px;">The change requests made in the summer of 2025 by the landowner are addressed in the D3 submissions at paragraphs 43 to 45, NGET worked up three options that seek to address feedback received at statutory consultation and appraised them through its established design change control process, which has its own governance procedures and draws on input from a wide range of disciplines. That process was followed, and the Applicant was informed that NGET had opted not to select any of those options, because neither proposed alternative was preferable to the proposed alignment. It should be</p>	<p>See above</p>

	<p>noted that feedback received from the Applicant in the summer of 2025 remained that NGET should avoid the Project entirely.</p> <p>The change request made in December 2025, addressed in the D3 submissions at paragraphs 46 to 48, and referred to in the Applications Deadline 2 response (REP2-052 Part 2) was made very late in the day. NGET was presented with a single line on a map. This represented a change in position for the Applicant because, unlike the earlier requests, it did not seek to avoid the Project's order limits entirely; they were, on their own case, accepting some overlap.</p> <p>NGET 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. NGET's policy is to give the full decision to the landowner first before publicly announcing it, and a meeting was arranged for 23 February 2026 at which the landowner will be informed of the outcome. It is therefore not the case, as suggested by the landowner, that NGET has failed to engage with the December change request.</p>	
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	<p>d. The preliminary observations on the December 2025 request, as set out in the D3 submissions at paragraph 47, include that the proposed route passes in very close proximity to residential properties (which would probably be oversailed), oversails an animal care facility, traverses elevated ground giving rise to landscape concerns, would require the undergrounding of a 132kV overhead line, and passes within approximately 200 metres of a Scheduled Monument. These are high-level examples of the type of issues that arise when a line is drawn on a plan without the more sophisticated analysis that NGET's route selection process demands.</p>	
<p>REP4-007/15</p>	<p>15. NGET submits that much of what was said at ISH3 on behalf of the landowner was not evidenced, was inaccurate, or was duplicative of the Applicant's submissions. In particular, the future developments referred to by the landowner are either not interactions with NHHM (in the case of the STEP fusion project, which has no footprint overlap) or are inchoate and unknown (in the case of the data centre and STEP associated development). NGET notes that the Parish Council and members of the public confirmed at the hearing that they had not previously heard of the proposed data centre.</p>	<p>See above (noting this submission is directed to the landowner not the Applicant)</p>

<p>REP4-007/16</p>	<p><b>Principle of Protective Provisions</b></p> <p>16. NGET's case on the principle of the PPs is set out in the D3 submissions at paragraph 49 and following, and in Table 2 thereof. NGET seeks PPs in respect of infrastructure not yet built. The statutory process for applying for a DCO in respect of NHHM is well advanced, and the application is to be submitted in Q3 2026 (that is, before any DCO is likely to be granted in respect of the Project).</p>	<p>See above</p>
<p>REP4-007/17</p>	<p>17. NGET has provided the Examination with two precedents where equivalent PPs have been imposed: the Awely Môr and Mona Offshore Wind Farm DCOs. These precedents demonstrate, as a matter of principle, that it is open to the Examining Authority ("<b>ExA</b>") to recommend, and to the Secretary of State to impose, PPs in respect of infrastructure not yet built.</p>	<p>See above</p>
<p>REP4-007/18</p>	<p>18. The justification for such PPs is, in NGET's submission, self-evident, given the manifest need for the infrastructure in question. It is also a matter of sound policy, enabling holistic planning, as recognised in NPS EN-1 at paragraph 4.11 and NPS EN-5 at paragraph 2.7.</p>	<p>See above</p>
<p>REP4-007/19</p>	<p>19. The Applicant's response to NGET's case on PPs has been twofold. Neither element has substance:</p>	<p>See above</p>

First, the Applicant contends that the Viking CCS DCO provides a precedent for the ExA and Secretary of State to refuse NGET protections in respect of NHHM. NGET submits that this is not a correct characterisation of the Viking decision. The Viking examination took place during 2024 (March to September), with the ExA's report in December 2024. At that time, as recorded in the ExA's report at paragraph 6.8.25, the position was that submission dates for NHHM's DCO application were "still some time away", and protection was therefore considered premature. The factual position is now fundamentally different: we are in February 2026, a mere matter of months away from a submission of a DCO application for NHHM, in circumstances where statutory consultation had not even commenced at the time of the Viking examination. It is an entirely different proposition.

Second, the Applicant contends that the Awel y Môr and Mona precedents are distinguishable because those developments were functionally reliant on substations to be constructed by NGET. NGET submits that this distinction is entirely artificial. The fact that a particular development is functionally reliant on a piece of infrastructure cannot be determinative of whether PPs are imposed to protect that infrastructure. NHHM is critical to the integrity of the transmission system, on which the

	<p>Project — like all other generators — in fact relies. The Applicant's approach would mean that the biggest, most strategic infrastructure would be the hardest to protect, which cannot be correct.</p>	
REP4-007/20	<p>20. In relation to the Applicant's submissions regarding sections 127 and 138 of the Planning Act 2008, NGET accepts that, in principle, neither section 127 nor section 138 is triggered by the PPs sought in respect of NHHM (as distinct from NGET's existing infrastructure and land, in relation to which those provisions are engaged). However, NGET submits that the fact that sections 127 and 138 are not engaged in relation to the future infrastructure PPs is not a reason in principle not to recommend those provisions. The Secretary of State has imposed equivalent PPs on two occasions (Awely Môr and Mona), demonstrating that there is no prohibition on doing so.</p>	See above
REP4-007/21	<p><b>Way Forward and Coexistence</b></p> <p>21. NGET submits that the two projects can coexist and indeed must coexist. NGET considers that, if the DCO is granted in respect of the Project, the works to deliver the Project can proceed. Cables can be laid across the NHHM corridor. The corridor for NHHM can be left otherwise undeveloped for a relatively short period. Once NHHM has been constructed, the balance of the Project can be</p>	See above

	delivered, and panels can be installed in the area between the proposed overhead line and the railway. There will be some limited areas of land not available for development by the Project as a result of NHHM, but this will amount to just over 1% of the total site.	
REP4-007/22	22. NGET therefore submits that there is clearly a solution available to the parties, and NGET very much hopes that it will prove fruitful in the very near future.	See above
REP4-007/23	<p><b>Compensation</b></p> <p>23. As set out in the D3 submissions, NGET commits (and has now put forward a proposal to the Applicant) to paying the Applicant fair compensation in respect of any losses (to be assessed in accordance with the compensation code) actually incurred by the Applicant, including:</p> <ul style="list-style-type: none"> <li>increased construction costs or construction delay which is genuinely consequent on the interface with NHHM; and</li> <li>any reduction in the extent of the solar array which is genuinely consequent on the construction or operation of NHHM.</li> </ul>	See above

**Table 2-7: EDF Energy (Thermal Generation) Limited**

ID	Verbatim Comment	Applicant Response
REP4-008/1	We ( <b>CMS Cameron McKenna Nabarro Olswang LLP</b> ), act on behalf of EDF Energy (Thermal Generation) Limited (“ <b>EDF</b> ”), who are registered as an Interested Party (Interested Party number F90DDC81F) in respect of the Application.	The Applicant has set out its position in relation to all statutory undertakers in its section 127 report submitted at this Deadline 5.
REP4-008/2	EDF continues to engage constructively with the Applicant in respect of protective provisions to be included on the face of the draft Development Consent Order. This engagement is well advanced, and EDF expects to reach agreement with the Applicant on protective provisions during the course of the Examination.	
REP4-008/3	In light of this, EDF maintains its objection to the Application for the reasons set out in its Relevant Representation (RR-053), pending agreement on the protective provisions. EDF will update the Examining Authority once agreement is reached and submit the agreed form of protective provisions at that stage, reserving its position to make further submissions should agreement not be reached.	

**Table 2-8: Fields for Farming**

ID	Verbatim Comment	Applicant Response
REP4-0010/1	<p>I would like a further response from the applicant regarding on what basis do they assume that the hare population will thrive in and around the solar infrastructure. I accept I made a mistake by referring to hare being a protected species, indeed they are a priority species. I can find no research from this country where hare have been found to thrive in an area of landscape of approximately 1,866 acres that was previously open and ideal habitat but has then turned to solar. In fact this is because this has not yet occurred. The chief ecologist on behalf of the applicant states the hare will be able to thrive on the swathes of land at the field edges and within the fenced areas of solar arrays. However, this must be an assumption.</p>	<p>Observations of mammals have been made as part of national ecological monitoring programmes at solar farms – such as Solar Energy UK’s ‘<i>Ecological Trends on Solar Farms UK</i>’ monitoring series. In Solar Energy UK (2024), it is stated that:</p> <p><i>“The most frequently observed species [at solar farms, using standardised monitoring] was the brown hare, making up 40% of [mammal] observations. This is a Species of Conservation Concern which thrives on solar farms; on one site visited large groups of brown hares were recorded, with the site effectively being grazed by this species.”</i></p> <p>Other research confirms that brown hares are more abundant at solar farms compared to agricultural ‘control’ sites. Montag <i>et al.</i> (2016) concluded:</p> <p><i>“Brown hare Lepus europaeus was found to be particularly abundant within solar plots, with counts ranging from 3 to 12 on a single survey. Hares were less abundant on control plots, with counts ranging from 1 to 3 on a single survey. The hares were seen to form scrapes beneath the panels and appeared to be utilising them for shelter. Natural gaps beneath the security fencing and gates were used to access the site.”</i></p> <p>References:</p> <p>Solar Energy UK (2024) <i>Ecological trends on solar farms UK</i>. Prepared by Solar Energy UK, Clarkson &amp; Woods, Lancaster University, and Wychwood Biodiversity.</p> <p>Montag, H., Parker, G., &amp; Clarkson, T. (2016) <i>The Effects of Solar Farms on Local Biodiversity; A Comparative Study</i>. Clarkson and Woods and Wychwood Biodiversity.</p>
REP4-0010/2	<p>Our concern at FFF is based on common sense. The fox is the main predator of hare and hare survives because it likes to be in the middle of open fields where it grazes and constantly</p>	<p>Please refer to the Applicant comment above.</p>

	<p>looks up and around to check for predator and if he is at risk he runs and has plenty of open space to famously out run the fox. If the hare is confined behind fencing with perhaps just a handful of gaps in the fencing his chances of escape are much reduced and foxes being very clever will likely work out how to block the gaps. Furthermore, if the hare is grazing, resting etc in the swathes at the edges the fox has perfect cover in the hedgerow and will able to get close to the hare to pounce. The hare will have the long length to run but not the width. Leverets in both situations will be easy prey. We note that each field given to solar isn't just a handful of fields as per other smaller solar ' farms' where hare has the option of shifting his territory a few acres along. This development covers a huge area. Common sense informs us hare will struggle to thrive and become a biodiversity net loss. Of course the other main threat to hare apart from fox is human!</p>	
<p>REP4-0010/3</p>	<p>We ask kindly for the examiners to ask the applicant again to evidence his claim that hare will not be affected.</p>	<p>Please refer to the Applicant comment above.</p>
<p>REP4-0010/4</p>	<p>I also would like to ask about the project manager's statement that the top soil that has been farmed will be removed and taken away and stored for future reinstatement on the land for farming. How is this done?, can soil be stored for 40 years and be kept healthy for farming? Is there research and evidence to show this can be done ? This was a very surprising statement .</p>	<p>Please see Applicant response to Q12.0.1 from ExA Q2 (document reference EN010163/EX/8.47) submitted at this deadline.</p>

**Table 2-9: Fields for Farming**

ID	Verbatim Comment	Applicant Response
REP4-0011/1	<p>Traffic</p> <p>13.6.15-17</p> <p>Sturton Rd/Gainsborough Rd Junction</p> <p>Please find attached video clip of an (thankfully) extreme example of a vehicle failing to stop at this junction. Many other examples of vehicles failing to stop have not been saved because the drivers left the scene having received only minor damage to their vehicle.</p>	<p>It does not appear that the video has been uploaded into examination. However, the description provided is enough for the Applicant to form a picture, and therefore it is not considered necessary to view the video itself. The Applicant will implement appropriate traffic management including on approaches to the Gainsborough Road/Station Road junction to increase awareness of construction traffic to existing traffic using the Sturton Road/Gainsborough Road junction. The OCTMP [APP-129] paragraphs 6.27-6.31 indicate that signage will be provided on key approach routes and at construction site access points and at the Gainsborough Road/Station Road junction. The appointed contractor will ensure appropriate insurances and health and safety protocols are adhered to. There will be a liaison group set up for any community concerns to be raised.</p>
REP4-0011/2	<p>Note how many vehicles are seen using the junction in this short video. Most of the speeding traffic through this area is caused by drivers, especially the ‘white van man’ using our roads as a rat run. This is the only T junction between the Bole roundabout and Retford if driving through the village.</p> <p>Screen grab submitted from original video. The screen grab shows the moment the car entered the garden and its headlight can be seen to the right of the van’s cab roof. Full video can be supplied if required. Previously noted</p>	
REP4-0011/3	<p>There is only one major T junction in Sturton, where Gainsborough Road meets Wheatley Road. Each year there are a number of accidents at this junction caused by traffic entering the village from the Gainsborough direction who fail</p>	<p>Personal Injury Collision (PIC) data has been obtained from Via East Midlands on behalf of NCC, has not indicated that there is an existing highway safety issue at this junction. Mitigation will be</p>

	to stop and either run into the bus shelter or crash into the neighbouring gardens.	provided to raise awareness of construction traffic through signage for example. This is set out in the oCTMP Chapter 6 which will be secured through Requirement 8 of the dDCO [REP3-005].
REP4-0011/4	This is the junction where RES propose that 50% of the HGVs bringing panels and building materials into the village envelope turn right into Wheatley Road for the short journey to their proposed storage facility at Secondary Compound B.	
REP4-0011/5	The number of accidents at this junction are under-reported as many are non-injury and the drivers concerned leave the area ASAP to avoid any police action.	
REP4-0011/6	This is the junction identified by the former Community Speed Watch team as recording the highest number of vehicles exceeding the posted speed limited by at least 15 miles per hour.	
REP4-0011/7	This was a result of drivers speeding out of the village along Gainsborough Road or coming into the village from South Wheatley where there is a the blind bend before the junction.	
		Mitigation e.g. signage to inform existing users and other construction vehicles will be provided on approach to the junction, as appropriate. This will be approved in consultation with NCC Highways as appropriate as part of the detailed design and technical approvals stage.

**Table 2-10: Fields for Farming**

ID	Verbatim Comment	Applicant Response
REP4-0012/1	Fields For Farming (FFF)  The following points, clarifications and objections were raised by Fields for Farming. Please note other	Noted.

	<p>representations maybe submitted by FFF given limited time to submit responses and collate them – apologies in advance if this is the case.</p>	
<p>REP4-0012/2</p>	<p>(3) Flood</p> <p>That the Secretary of State considers that there is a significant regulatory gap in the Environmental Permitting Regulations relating to pollution control and Solar arrays and more specifically relating the Battery Energy Storage Systems (BESS) and that they are primarily regulated through Health and Safety and Planning systems which leaves an unacceptable risk to the environment.</p> <p>The developer has yet to determine what plant and infrastructure they are to use through the detailed design process which they say is to follow DCO. This leave unknown unknowns in terms of potential toxic and polluting chemicals in both the panels and the BESS.</p> <p>FFF also maintains that the main thrust of the flood risk analysis is the protection of the plant from damage rather than the community and the environment.</p> <p>The whole area is a flood plain which is drained by pumps. Flooding in the past has been a result of pumps failing, and this does not appear in the worst-case scenario in the fold risk assessment. In addition, it was noted that the SuDs will be drained to the ordinary watercourses within the area which</p>	<p>A reference for the statement regarding the opinion of the Secretary of State is not provided so the Applicant is unable to comment specifically regarding this statement. However, the Applicant concurs that the current regulatory system for solar arrays and BESS is via the planning system.</p> <p>The Applicant does not agree that this leaves an unacceptable risk to the environment. Through the current DCO application process, due consideration is given to all national and local policy and guidance, with significant consultation undertaken with key regulatory stake holders, notably the Environment Agency. A key focus with regard to the BESS has been the management of fire water to ensure the protection of the water environment in the event of a fire. The Outline Fire Risk Management Plan and Surface Water Drainage Strategy [6.3.8 Appendix 8.2 Rev 5] have been developed in consultation with the Environment Agency and include measures for the capture, testing and disposal of potentially contaminated fire water. The Drainage Strategy also includes measures for the treatment of day-to-day runoff from the solar arrays, BESS and substation areas prior to discharge.</p> <p>The Applicant does not agree that the flood risk analysis focuses on the protection of plant rather than the community and the environment. The Flood Risk Assessment [5.3 &amp; 6.3.8 Appendix 8.1 Rev 5] considers the potential for increases in flood risk off-site due to displacement of floodwater and increased surface water runoff. The Flood Risk Assessment confirms that there is no significant displacement of floodwater that could result in an increase in flood risk off-site, and that the Surface Water Drainage Strategy [6.3.8 Appendix 8.2 Rev 5] ensures there is no increase in surface water flow rates leaving the site post-development. Additionally, the Applicant has made a commitment to providing two flood storage basins as a voluntary measure to help improve the current flooding issues within Sturton-le-Steeple.</p>

	<p>ultimately pump into the River Trent, this does not appear to have been addressed.</p>	<p>The Flood Risk Assessment was amended at Deadline 5, in discussion with the Environment Agency, to include further assessment regarding the potential risks associated with a pump failure. In the event of a pump failure, flooding is likely to be localised to the area immediately behind the River Trent defences where the Ordinary Watercourses discharge into the River Trent. The nearest proposed infrastructure (solar panels) is at least 1km from the pump locations and therefore unlikely to be affected by a pump failure. The Flood Risk Assessment already takes account of a breach of the River Trent defences during a 1 in 100 year plus 29% climate change allowance event. The pump failure event is considered to be less extreme than a fluvial flood event resulting from a breach of the River Trent defences. The mitigation measures proposed in relation to a breach flood event are therefore sufficient to protect against flooding during a pump failure event. Rates of runoff discharged from the Proposed Development will be no higher than existing rates, therefore discharge of runoff from the Development would not exacerbate flooding in the event of a pump failure.</p> <p>The Applicant understands that these documents are now agreed with the Environment Agency and has submitted an SoCG to that effect.</p>
<p>REP4-0012/3</p>	<p>(4) Health, Safety &amp; Wellbeing</p> <p>We note that the developer had not yet responded to all matters raised in previous representations (from FFF and other IPs).</p> <p>The Health Impact Assessment focuses on physical pollutants and, in our opinion inadequately quantifies the mental health impact and wellbeing of this project on our community. Professional judgement is heavily relied upon, and</p>	<p>The Health Impact Assessment (HIA) <b>[APP-183]</b> considers the potential mental health impact on a range of receptors in a number of the six overarching determinants of health including ‘Lifestyles’, ‘Social and community influences on health’, and ‘Living / environmental conditions affecting health’, for either or both of the construction/decommissioning and operational phases.</p> <p>Furthermore, potential physical impacts associated with all other direct and indirect causal effects referred to are considered within the HIA <b>[APP-183]</b>, with information drawn from detailed technical assessments presented in the wider ES and application package.</p> <p>Regarding BESS safety, please see the Applicant’s response to ExQ2 18.1.2, in its responses to the Examining Authority’s second written questions.</p>

	<p>landscape-scale changes and loss of recreational amenity has not been given proportionate weight.</p> <p>Given the cumulative impact of this on other projects, Electromagnetic fields has been raised as a major concern and this project brings these concerns within closer proximity to the villages and its residential properties.</p> <p>Great concern regarding BESS Safety and toxic plumes have been raised, plume dispersal was discussed, but appeared to rely on the prevailing wind direction, not helpful to residents and other critical manned projects and residents in those situations, and as yet there is no clear emergency plans in place for such an event (see fire risk) which is also causing much debate and heightened anxiety amongst residents.</p> <p>This is a very quiet rural environment (even with the existing energy infrastructure), however this large-scale development brings the low frequency emitters closer to residential property and more so to users of PRow. Low-Frequency noise will be constant and has potential to affect sleep quality.</p> <p>FFF maintain that the cumulative impact of construction stress and consultation fatigue has not been addressed sufficiently given the high number of NSIP projects in the wider area. This has now been compounded by the Landowners Lawyers representation comments made at</p>	<p>The noise and vibration assessment takes into account all relevant issues relating to noise associated with the introduction of the Proposed Development, concluding that there would be no significant impacts with standard mitigation measures applied. The assessment takes into account the relatively low rural background noise levels in the area and there is no evidence to suggest that the predicted levels of noise generated by the electrical equipment to be installed as part of the Proposed Development would result in health impacts or sleep disturbance.</p>
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	<p>ISH3 regarding other potential projects including a Datawarehouse.</p> <p>Residents, Visitors and tourists to the area will lose their sense of pride of place and association with the historical heritage assets in the area and the open countryside, the impact on this good feel factor has not been adequately assessed. maybe classed as temporary and transient, but when looking out of the windmill windows towards the solar array (180-degree impact) and the panels will be angled towards the windmill), the assessment appears only to consider views from ground level.</p> <p>Representatives from the community spoke about the real and current concerns around health and well-being, loss of amenity and isolation, expected crime levels once construction commences (especially theft as seen in other areas), the health risk assessment once again relies heavily on professional judgement and appears to place great weight on air emissions and reaching its conclusion and forgets the negative impact of all the other factors raised by the FFF community group.</p>	
<p>REP4-0012/4</p>	<p>(5) Land use and agriculture</p> <p>FFF do not intent to re-state their previous representations, however a local tenant spoke poignantly about the impact</p>	<p>ES Chapter 12:Climate Change <b>[APP-070]</b> confirms the total GHG emissions from the construction phase are estimated to equate to 273,000 tCO<sub>2</sub>e, largely from embodied carbon in construction materials. Total operational GHG emissions are estimated to equate to 174,000 tCO<sub>2</sub>e over the 40-year design life (minor adverse effect but not significant). However, as it is predicted that over the lifecycle of the Proposed Development, there will be a total GHG emissions saving of 1,380,000</p>

	<p>that this project will have on the farming community in this area, both directly and indirectly.</p> <p>There will be no socio-economic benefit to the micro economy, rather the other extreme, generations of tenant farmers will have their tenancies terminated, and support service industries will suffer loss of business. The Trent valley is The Breadbasket of Nottinghamshire. The developer in their own reports says that the only benefit is short-term to the wider locality from remote construction workers using hotels and the like for accommodation (not even local temporary construction jobs).</p> <p>Much reliance is put on the fact that 40 years is only temporary, and that steel posts will be driven into the ground for the solar arrays. The developer has not quantified the amount of concrete and other aggregates that will be used to facilitate this project given many roadways are to be constructed, the substation and BESS infrastructure pads and not least, the many miles of fencing posts that will require concrete mountings. Can the community be assured these will all be removed and the land truly re-instated.</p> <p>The developer implied that the ponds, scrubland and other mitigation will be left to the landowner to decide what to do.</p>	<p>tCO<sub>2</sub>e, when compared against estimated emissions that would result from sourcing the equivalent energy supply from the grid (beneficial (significant) effect). The total GHG emissions from the decommissioning phase are estimated to equate to 14,300 tCO<sub>2</sub>e (minor adverse effect but not significant).</p> <p>The Applicant has also submitted an outline Decommissioning Plan (oDP) <b>[REP3-013]</b> that has been revised and submitted at this deadline. Requirement 21 of the dDCO <b>[REP3-005]</b> secures Decommissioning and Restoration, building on details provided in the outline plan.</p>
<p>REP4-0012/5</p>	<p>(6) Biodiversity and ecology</p>	<p>Regarding the third and fourth paragraphs of Item 6 (Ecology and Biodiversity), independent research by Copping <i>et al.</i> (2025) has verified that biodiversity increases when arable farmland is converted to mixed solar farms [Steeple would be a “mixed” solar farm”], concluding: “<i>Our findings</i></p>

	<p>The applicant confirmed that gaps would be left in fencing to allow wildlife to move around the proposed development, however it was noted by FFF that this amounted to only 400 gaps 200mm x 300mm in an area of 2200 acres (5 per acre), where currently, as the inspector has seen they have free movement as the landscape is open with little, if any fenced fields. The area is open fields and hedgerows.</p> <p>FFF also noted that the surveys are all well and good, but wildlife follows seasons and the weather, and a survey is a single point in time (yes it was repeated but on a daily basis). FFF has photographic evidence of the prolific wildlife in the area as seen daily (1000's of photographs taken by local residents). These include red listed Yellowhammer and Fieldfare seen in the development area (all taken from ProW). The mitigation proposed by the applicant is not sufficient to accommodate the numbers of redlist wildlife that is being impacted – the mitigation areas (if effective) will become very crowded.</p> <p>The conversion of arable land to managed grassland may increase floral diversity on paper, it fails to account for the habitat loss caused by the physical presence of the solar arrays. Research suggests that ground-foraging and hedge-nesting birds often exhibit 'displacement' by avoiding even high-quality foraging margins if they are hemmed in by tall, industrial infrastructure.</p>	<p><i>largely support the work of Montag et al. (2016), who observed greater abundance and species richness of multiple taxa, including birds, within solar farms compared to control plots within nearby arable land.”</i></p> <p>Such research supports the Applicant’s conclusions that the Proposed Development is likely to have neutral to positive residual impacts on most bird species throughout operation.</p> <p>References:</p> <p>Copping, J. P., Waite, C. E., Balmford, A., Bradbury, R. B., Field, R. H., Morris, I., &amp; Finch, T. (2025). Solar farm management influences breeding bird responses in an arable-dominated landscape. <i>Bird Study</i>, 72(3), 217–222. <a href="https://doi.org/10.1080/00063657.2025.2450392">https://doi.org/10.1080/00063657.2025.2450392</a></p>
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## Applicant Comments on Deadline 4 Submissions

### Steeple Renewables Project

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	<p>Furthermore, how will the applicant ensure that the proposed margins and mitigation actually provide what our local bird and wildlife population will lose when the 2200 acres of arable baseline is removed. The mitigation remains speculative and insufficient to prevent a localised decline in vulnerable populations.</p>	
REP4-0012/6	<p>(7) Transport and access</p> <p>FFF restate their concerns regarding the cumulative impact of this and other projects, whilst assurances have been given that these will be managed effectively between National Highways, Nottinghamshire County Council and the applicant, matters such as off road traffic management and clashes with other projects using the same off-road network remains unanswered.</p>	<p>The Applicant notes this comment.</p>
REP4-0012/7	<p>(8) Historic Environment</p> <p>FFF and North Leverton Windmill trust have worked together to submit responses to the Examining Authority and much has already been said. The Parish Council has also provided much detail to support why this project should be refused because of the light touch approach the applicant has given to the impact on the many heritage assets (some of significance) in the area. Nottinghamshire County Council have also echoed these concerns with respect to buried</p>	<p>With regard to the Pilgrim Trail, a further review had not identified any advertised walking route associated with this on the Visit Nottinghamshire website, Bassetlaw District Council's information with regard to the Mayflower Pilgrims, or the Pilgrim Roots Project website, which details the Pilgrim Trail and provides supplementary maps and information. Furthermore, a review of private tour operators, as recommended by Bassetlaw District Council (e.g. Pilgrims &amp; Prophets) has not identified any advocated walking routes. In all cases tours are focussed on specific key buildings and settlements rather than particular routes between them.</p> <p>With regard to these routes generally, the Applicant has already provided detailed responses with regard to the various trails, which are all modern routes (e.g. Applicant's Comments on Relevant Representations <b>[REP1-008]</b>, reference RR-029/15 at p.85-6).</p>

	<p>archaeology, St Peter’s and St Paul’s Church in Sturton le Steeple and North Leverton windmill.</p> <p>In addition, the applicant has not assessed the impact that this development will have on the sustainability of these assets and their contribution to the local economy (direct and indirect) as a result of this application.</p> <p>To confirm, there is a Pilgrim Trail driving route, a Pilgrim Trail walking route and the Trent Valley Way walking route, all will be impacted by the development.</p>	<p>No evidence has been adduced into the examination by Fields for Farming that the assessed effects reported by the Applicant would result in economic harm to those assets. The Applicant has carried out an assessment of the socio-economic effects of the proposed development, as set out in Chapter 10 of the Environmental Statement <b>[APP-068]</b>.</p>
<p>REP4-0012/8</p>	<p>(9) Landscape &amp; Visual</p> <p>Regarding glint and glare, residents’ views will be impacted by the panels, this is acknowledged but underestimated. Visitors and tourists to North Leverton Windmill will be greatly impacted, the development maybe classed as temporary and transient, but when looking out of the windmill windows towards the solar array (180-degree impact) and the panels will be angled towards the windmill), the assessment appears only to consider views from ground level.</p> <p>There is significant landscape and visual impact from this project.</p>	<p>The potential for effects from glint and glare were addressed thoroughly in Chapter 16 of the Environmental Statement <b>[APP-073]</b>.</p> <p>The matter of the potential for effects on views from the North Leverton Windmill, both as a heritage asset and in terms of visual amenity, have been addressed within the Environmental Statement (Chapter 6 <b>[APP-064]</b> and Chapter 9 <b>[APP-067]</b> and subsequently within the Issue Specific Hearings <b>[REP1-009]</b> and <b>[REP4-031]</b>. Consideration has been given to views of the Proposed Development from the windows in the windmill.</p> <p>Regarding landscape and visual effects, these were addressed thoroughly in Chapter 6 of the Environmental Statement <b>[APP-064]</b>. It is acknowledged that some significant landscape and visual effects have been identified. However, paragraph 5.10.5 of the updated Overarching National Policy Statement for Energy (EN-1) advises that ‘<i>Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape</i>’. Paragraph 5.10.6 confirms that ‘<i>the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.</i>’ The Applicant has followed the mitigation hierarchy in accordance with the National Policy Statements.</p>

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REP4-0012/9	<p>(10) Other</p> <p>Emergency Access to the BESS was discussed, FFF seeks clarification as to which road and where the two access points will be as there is potential confusion on where the secondary access will be (street names used locally may differ from those used by the developer especially regarding North Street, the point it becomes Common Lane and Cross Common Lane).</p>	<p>Please see Nottinghamshire County Council's deadline 4 response [REP4-001] which sets out their position as to the classification of common lane.</p>
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**Table 2-11: Mr & Mrs J Barlow**

ID	Verbatim Comment	Applicant Comment
REP4-0014/1	<p>We thank the developer for their previous e-mail responses to confirm that our residential home nor our field on (redacted) and our yard on (redacted) is within the red-line boundary of the proposed development.</p>	<p>Noted.</p>
REP4-0014/2	<p>During the meeting, the following clarifications were sort us :</p> <p>Why the CPO sort permanent rights of access over our interests when the project is only temporary.</p> <p>That Access to the yard on (redacted) and our agricultural field on would not be impeded at any time.</p> <p>As to why a number of residents on (redacted) that we have spoken to (both before and after) the CAH do</p>	

	not appear to have had written notifications about the potential CPO.	
REP4-0014/3	The applicant confirmed during the meeting that the works sort on (redacted) in the immediate vicinity of our field were for mitigation only and as such no cables or access to land we have interest in that area would be affected whatsoever. (we also note that the book of reference does not include any of our interests in this area).	
REP4-0014/4	The Examining Authority suggested that the developer speak to Mrs Barlow following the meeting to discuss the rights sort relating to the access to the yard on (redacted)	
REP4-0014/5	<p>Mrs Barlow thanks the developer and their legal advisors for taking the time immediately following the CAH, and awaits written confirmation of those discussions (by e-mail) namely</p> <p>Although the CPO sort is deemed permanent it is referenced back to the DCO which is time limited, and as such the CPO will fall away when the project and DCO is satisfied i.e. on completion of decommissioning.</p> <p>The red line extends only to the highway and not to our access track, and that we own a right to the subsoil under the highway in which the developer may need to lay cables, hence the need for the CPO (although we did say a negotiated process would have been much</p>	The Applicant has engaged with Mrs Barlow following the CAH hearing last month and has also written direct to Mrs Barlow understands that matters are now resolved.

	<p>simpler and less stressful), and that access to our farm and livestock would not for a matter of hours not days.</p> <p>Costs (reasonable) relating to any CPO sort by us should the DCO be granted would be borne by the developer.</p>	
REP4-0014/6	<p>The matter of certain neighbouring properties not knowing of the potential CPO is not a direct concern for us but is a matter that the developer may want to take up given verbal comments made to us by more than one property owner along this stretch of highway.</p>	Noted.

**Table 2-12: Mr & Mrs J Barlow**

ID	Verbatim Comment	Applicant Response
REP4-0015/1	<p>We are coming to the end of the examination process, and it is noted that many of the assessments result in low impact or minor significance. We still do not agree with these findings. Landscape and views will be totally lost, heritage setting changed, total loss of public amenity in the area</p>	Noted.
REP4-0015/2	<p>Throughout this process we have noted that the applicant and their advisors rely heavily on subjective professional judgement rather than empirical, site-specific data. By deferring detailed infrastructure design until after the DCO is granted, the developer has introduced a series of "unknown unknowns" that downplay the potential for contamination</p>	<p>The Applicant does not agree that the flood risk analysis focuses on the protection of their own assets over the safety of the community. The Flood Risk Assessment considers the potential for increases in flood risk off-site due to displacement of floodwater and increased surface water runoff. The Flood Risk Assessment confirms that there is no significant displacement of floodwater that could result in an increase in flood risk off-site, and that the Surface Water Drainage Strategy [6.3.8 Appendix 8.2 Rev 5] ensures there is no increase in surface water flow rates leaving the site</p>

	<p>and environmental harm. Furthermore, the flood risk assessments appear fundamentally skewed; by failing to model the reality of pump failure and the cumulative impact on local watercourses, the applicant has prioritised the protection of their own assets over the safety of the community. This pattern of optimistic assumptions fails to satisfy the precautionary principle and results in a significant underestimation of the project's true environmental and hydrological impact.</p>	<p>post-development. Additionally, the Applicant has made a commitment to providing two flood storage basins as a voluntary measure to help improve the current flooding issues within Sturton-le-Steeple.</p> <p>The Flood Risk Assessment was amended at Deadline 5, in discussion with the Environment Agency, to include further assessment regarding the potential risks associated with a pump failure. The Applicant understands that this is now resolved with the Environment Agency and has submitted an SOCG to that effect. In the event of a pump failure, flooding is likely to be localised to the area immediately behind the River Trent defences where the Ordinary Watercourses discharge into the River Trent. The nearest proposed infrastructure (solar panels) is at least 1km from the pump locations and therefore unlikely to be affected by a pump failure. The Flood Risk Assessment [5.3 &amp; 6.3.8 appendix 8.1 Rev 5] already takes account of a breach of the River Trent defences during a 1 in 100 year plus 29% climate change allowance event. This pump failure event is considered to be less extreme than a fluvial flood event resulting from a breach of the River Trent defences. The mitigation measures proposed in relation to a breach flood event are therefore sufficient to protect against flooding during a pump failure event.</p> <p>A conservative approach has been taken throughout the Flood Risk Assessment in line with best practice and Environment Agency requirements. For example, 'residual' risk scenarios such as a breach of the River Trent defences have been assessed and mitigated for. Additionally, 'sensitivity testing' has been undertaken as part of the modelling of Ordinary Watercourses, which includes for consideration of flows that are 20% higher than the 'design' flows.</p>
<p>REP4-0015/3</p>	<p>The applicant should be made to demonstrate safety. By deferring the detailed design of Battery Energy Storage Systems (BESS) and solar plant infrastructure until after the Development Consent Order (DCO) is granted, the applicant has failed to do this and creates a gap in the Environmental</p>	<p>The Applicant has not sought to defer matters regarding battery safety to detailed design. The Outline Fire Risk Management Plan [REP2-029] clearly sets out the extent to which the Applicant has designed, and will design in accordance with established safety criteria as set out by the National Fire Chief Council safety standards.</p>

## Applicant Comments on Deadline 4 Submissions

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	Impact Assessment and should not be used as a reason to ignore the risk as required – use of the Rochdale Envelope is wide in this application.	
REP4-0015/4	The Secretary of State has a legal duty to apply a precautionary principle, not least of all that BESS sites are not currently covered under Schedule 1 Environmental Permitting activities and poses unacceptable risk to the River Trent and the surrounding valley's ecosystem.	The Applicant does not consider the precautionary principle to be a relevant reference. Battery technology is well established in the UK and the Applicant has proposed clear design guidelines to mitigate risk of harm. The absence of a requirement for an Environmental Permit does not generate a presumption that there is a lack of scientific certainty on harm.
REP4-0015/5	Specific  We are concerned about potential impacts on our farm which is neighbours this proposed project	Noted.
REP4-0015/6	Flood  We do not believe that the flood risk from Oswald Beck has been adequately assessed given potential for run-off into this Dyke. NCC as the local flood authority have noted that there is significant water run-off in this area and there does not appear to be any managed mitigation or SuDs planned for this area of the proposed development and our concerns have not been addressed.	The Oswald Beck is an Ordinary Watercourse and the flood risk arising from this watercourses is assessed within the Flood Risk Assessment using the Environment Agency's risk of flooding from surface water mapping. The flood risk is shown to remain within or close to the watercourse channel for all return period events. In terms of the mitigation of risks to this watercourse, the Applicant notes that the proposed infrastructure in the vicinity of the Oswald Beck comprises solar panels only. Runoff from the solar panels will soak into the ground as it does currently and will therefore not increase flows within the Oswald Back. This approach is supported by NPS for Renewable Energy Infrastructure (EN-3) which states that " <i>...as solar PV panels will drain to the existing ground, the impact will not, in general, be significant</i> ".  Therefore, the Applicant does not consider that the Proposed Development introduces increased risk of flooding to Oswald Beck and no mitigation is therefore required.

<p>REP4-0015/7</p>	<p>Badgers</p> <p>The project has a two-year construction phase, during this time a number of badgers setts are planned to be closed (permanently or temporarily), during this period there is risk to our Original Population of Lincoln Red Cows which has not been adequately assessed. These badgers could move to the land that our herd grazes significantly increasing the risk of TB spread. The movement of even a small number of badgers from a larger sett has risks that could lead to members of the same sett following onto our land. The mitigation proposed is movement rather than total avoidance which move the risk to us where currently we are TB clear.</p>	<p>The potential risks associated with badger activity on Site and the spread of bovine TB are considered within Action Point ISH2.8 of the Applicant’s Written Summaries of Oral Submissions – CAH1, ISH2, ISH3 <b>[REP4-031]</b>.</p>
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**Table 2-13: Mr & Mrs J Barlow**

ID	Verbatim Comment	Applicant Response
<p>REP4-0016/1</p>	<p>Following the meeting held last week, and the questions raised by us, we seek clarification (without prejudice to our ongoing objection to this project) that the draft Development Consent Order:</p> <ol style="list-style-type: none"> <li>1. Provides the residents and community protection in the event of an event occurring that causes damage (including potential replacement of solar arrays and other associated infrastructure) which would result in an increase in disturbance and impacts over and above routine</li> </ol>	<p>Any ongoing operations, including maintenance and repair, would be subject to the operational environmental management plan <b>[REP3-016]</b> secured by requirement 9 of the dDCO which must include measures for the replacement of damaged solar panels as per Requirement 9(2)(d) of the dDCO, which can be found at Schedule 2 of the dDCO.</p>

	<p>maintenance during the operational phase e.g. increased traffic and noise etc that could go unchecked and without adequate permitting/pre-authorisation by the LPA. e.g. The Porth Wen Solar Farm.</p>	
REP4-0016/2	<p>2. The developer is proposing that any emergency works require notification within 72 hours of their commencement, given this is a notification and does not prohibit the developer from commencing the works, should this not be a shorter timeframe e.g. 24 hours which is more aligned to LPA and EPR regulations (some of which require immediate notifications for serious incidents).</p>	<p>The Applicant continues to view 72 hours as an adequate period and is not aware of comments from the local planning authorities that a shorter period would be required. The period of 72 hours has been granted on other Orders such as Oaklands Farm Solar Park Order 2025, or the Byers Gill Solar Order 2025.</p>
REP4-0016/3	<p>3. That the 40-year (temporary) period from the date at which the first array is commissioned is set in stone and cannot be varied by any mechanism, nor can the requirements of the decommissioning plan be varied such that all the land is returned to agricultural use. E.g. construction roads are removed and cables not left in situ. We have seen real examples in the area where conditions that were thought to be in place were varied (both time and reinstatement requirements) have been varied by agreement once the initial permission has been given.</p>	<p>Requirement 21, Schedule 2, of the dDCO is absolutely clear that decommissioning must commence no later than 40 years following the date of final commissioning of the first phase of Work No.1 and must be completed within 2 years of the approval of the decommissioning plan.</p>
REP4-0016/4	<p>4. Insurance / Assurance that adequate and tangible decommissioning security is in place, and not just at the commencement of the project development. It is well evidenced that large scale projects change hands on a regular</p>	<p>These comments are noted, there is no policy requirement in the National Policy Statements for a decommissioning bond. Please see the Applicant's response to Action Point: ISH3.11 <b>[REP4-031]</b> for its position regarding transference of liability.</p>

	<p>basis either due to sale or group re-structures. Incoming parties must also be subject to the same level of scrutiny as the outgoing parties, or both parties must ‘remain on the hook’ for the decommissioning liability. The liability should never fall back on the taxpayer. The draft DCO contains security provisions, but not for a publicly held/accessible decommissioning bond – government acknowledges that the operator should bear the risk. There are still unknowns relating to solar, most specifically relating to BESS and a landowner may be desirous of not returning the land to its original use in the future.</p>	
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**Table 2-14: Karen Hodgson**

ID	Verbatim Comment	Applicant Response
REP4-0017/1	<p>Please can you ensure Mr Robinson receives these photos of a large group of Linnets - which he asked me to send during the hearing today . The last image is particularly remarkable as my birding friends all say they have never seen such a large grouping .</p>	<p>Large flocks of linnets <i>Linaria cannabina</i> were recorded as part of the Applicant’s baseline surveys. The Wintering Bird Report [APP-108] confirms that birds were recorded throughout the winter, with flocks up to 250 birds. The largest flock was in the Eastern Biodiversity Mitigation Area in December 2023 (250 birds in a hedgerow and 135 birds in an arable field). There were an estimated 29 breeding territories of linnet identified during the summer breeding surveys (refer to Breeding Bird Report [APP-106]). Residual effects to the breeding bird assemblage (including linnets) were assessed to be neutral and not significant, with potential to be beneficial at Site level as habitat creation and enhancement measures mature (Chapter 7: Biodiversity and Ecology [REP3-009]).</p>
REP4-0017/2	<p>These were taken by a woman in the village last year I think in late August . Taken down Springs Lane in Sturton - the lane leading up to high house and where the solar panels are proposed .</p>	

REP4-0017/3	<p>These flocks are regularly seen . I have many more photos of local wildlife and we are encouraging people to report their sightings to the MBN , I spot or NGBRC . We have found they seem to be slow to process .</p>	
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**Table 2-15: Sturton-le-Steeple Parish Council**

ID	Verbatim Comment	Applicant Response
REP4-037/1	<p><b>How Christian Heritage Contributes to the Significance of Heritage Assets in and around Sturton le Steeple</b></p> <p><b>1) Overview</b></p> <p>In our opinion, Christian heritage is a primary contributor to the significance of multiple heritage assets in and around Sturton le Steeple. Its contribution is not limited to the intrinsic architectural or archaeological interest of individual sites, but is fundamentally expressed through:</p> <ul style="list-style-type: none"> <li>• Associative value (links to internationally significant figures and movements),</li> <li>• Communal value (living tradition, identity and meaning for present communities and visitors),</li> <li>• Setting and experiential value (the historic landscape through which narratives are understood and taught), and</li> </ul>	<p>The Proposed Development will not affect the ability to appreciate the historic association between key figures and movements of any heritage assets associated with the Christian heritage of Sturton le Steeple, nor will it affect the communal value in terms of identity or meaning of such assets, as the fundamental relationship between the assets and the associated settlement will remain unchanged. It is acknowledged that there will be impacts to the significance of some assets, through changes to setting, as outlined in ES Chapter 9 – Cultural Heritage <b>[APP-067]</b>. There is no evidence to suggest that there will be impacts to the economic and public value of the Christian Heritage of Sturton le Steeple. If faith-related and/or roots/ancestry tourism is taking place, it is occurring due to the historic association of the town and the Church of St Peter and St Paul with key figures such as John Robinson, or through visitors’ on personal historic associations with the settlement, personal associations with Pilgrim figures or an interest in the origins of the Pilgrim movement. Such associations will not be affected by the Proposed Development.</p> <p>The settlements and associated lanes etc. are not heritage assets. They have been considered where relevant to the setting of heritage assets such as the Church of St Peter and St Paul (see Chapter 9 – Cultural Heritage <b>[APP-067]</b>, and Appendix 9.1 Cultural Heritage Technical Baseline <b>[APP-122]</b>).</p>

	<ul style="list-style-type: none"> <li>Economic and public value (an established and growing faith-related and roots/ancestry tourism offer).</li> </ul> <p>This is the framework in which Christian heritage elevates the importance of assets such as Sturton le Steeple Church, associated churchyards (including Habbleshorpe), the historic settlement pattern and lanes, and the broader network of sites on the Mayflower Pilgrim and Baptist trails.</p>	<p>The Applicant has already provided detailed responses with regard to the various trails, which are all modern routes (e.g. Applicant’s Comments on Relevant Representations [REP1-008], reference RR-029/15 at p.85-6).</p>
<p>REP4-037/2</p>	<p><b>2) Associative Value: Why the links matter</b></p> <p>Many assets in the area are internationally significant by association, even when their individual fabric may be modest. Sturton le Steeple and its landscape are integral to the story of John Robinson and John Smyth, pivotal figures in the Separatist/Pilgrim and Baptist movements respectively. This aligns the area with:</p> <ul style="list-style-type: none"> <li>The Mayflower story (with global recognition, especially in the USA), and</li> <li>The origins of Baptist traditions, with substantial academic, denominational and family-history interest.</li> </ul> <p>In heritage terms, associational significance is recognised as a legitimate and powerful dimension of value: buildings and places acquire enhanced status because of who was there, what they did, and how those events shaped wider history.</p>	<p>Noted, see comments above.</p>

	<p>Just as Epworth Old Rectory is significant for its link to the Wesleys and global Methodism, the church at Sturton and the historic route between Sturton and Hablesthorpe take on augmented importance because they enable people to engage directly with the paths trodden by Smyth, Robinson and their communities. These associations are particular, evidenced, and widely interpreted to visitors (e.g., Mayflower 400 boards, guided tours, museum interpretation).</p>	
<p>REP4-037/3</p>	<p><b>3) Communal Value: Pilgrimage, identity and meaning</b></p> <p>For many visitors — including Mayflower descendants, Baptist congregations, US tour groups, and university parties — these places function as sites of reflection, memory, and identity. Their value is not purely aesthetic: it is experiential and affective. Experience from guided tours confirms that walking and driving the routes, stopping at churches and churchyards, and absorbing the countryside are essential parts of the story (not simply the discrete monuments). The reaction of visitors — from students remarking “this is the real England” to scholars visibly moved at Hablesthorpe — demonstrates the continuing communal and spiritual relevance of the landscape as a lived heritage.</p> <p>Communal value is recognised in planning and heritage practice as a significant component of an asset’s overall significance. In Sturton’s case, it is actively being strengthened by local initiatives, including the new Pilgrim Sculpture in the</p>	<p>Noted, see comments above.</p>

	<p>village park and the Parish Council’s early-stage efforts to develop and promote heritage tourism. These initiatives encourage dwell time and connect visitors with multiple sites on the trail.</p>	
<p>REP4-037/4</p>	<p><b>4) Setting and the Historic Landscape: How the landscape “does” heritage</b></p> <p>The setting of assets like Sturton church and Hablesthorpe churchyard is not a neutral backdrop; it is the medium through which the story is interpreted. The pattern of fields, lanes, watercourses and wide Trent-valley vistas — shaped by historic enclosure and drainage — still conveys the look and feel of the landscape that the Separatists and early Baptists knew. Even though landscapes evolve (roads, railways, bridges), the coherence of the rural scene and long views remains fundamental to the intelligibility and authenticity of the story being told on the ground.</p> <p>A large, industrial-scale solar array in this context would repattern the landscape, introduce extensive reflective/engineered surfaces, perimeter fencing and security infrastructure, and interrupt or truncate key views and the rural experience. That erodes the ability of the public to apprehend the heritage values in situ — particularly the relational experience of moving between related sites (e.g., Sturton ↔ Hablesthorpe ↔ West Burton) as part of the Mayflower and Baptist narratives.</p>	<p>Noted, see comments above.</p>

<p>REP4-037/5</p>	<p><b>5) Economic and Public Value: An established and growing tourism asset</b></p> <p>Within North Notts tourism, the Mayflower Pilgrim Trails are well-promoted, and Sturton le Steeple features strongly within that offer. Multiple tour operators and heritage organisations have run bespoke itineraries across the area for years (e.g., Pilgrims &amp; Prophets, Reformation Tours, St Cecilia Tours, the General Society of Mayflower Descendants, Bassetlaw Museum guides). Crucially:</p> <ul style="list-style-type: none"> <li>• Trails are not a single fixed itinerary. They are a network of linked sites and adaptable routes tailored to visitor interests (Mayflower/Separatist, Baptist, family history).</li> <li>• The journeying between places — and the countryside itself — is part of the interpretive experience. There are walking elements (green lanes, Trent Valley Way sections) and driving links that are both valid and commonly used in UK heritage tourism (cf. many established “historic driving routes” elsewhere).</li> </ul> <p>The Parish Council’s investment in the Pilgrim Sculpture and the early steps to grow local tourism demonstrate a credible trajectory of development. The proposed scheme would curtail that development by reducing the attractiveness, coherence and legibility of the heritage offer, damaging the</p>	<p>The Applicant has already provided detailed responses with regard to the various trails, which are all modern routes (e.g. Applicant’s Comments on Relevant Representations [REP1-008], reference RR-029/15 at p.85-6). It is acknowledged that there are a variety of planned and bespoke tours which relate to Christian Heritage, some of which include Sturton le Steeple due to the settlement and church’s historic association with certain figures e.g. John Robinson and Katherine White who travelled on the Mayflower. All tours notably are primarily concerned with specific places and buildings, due to their historic associations, and the ability to appreciate these associations will remain unchanged by the Proposed Development. There is no evidence to suggest that the Proposed Development would dissuade any visitor interested in a specific historical association, personal or spiritual, from visiting Sturton le Steeple, as this association would not be affected. The Scheme would not obscure, diminish or remove the ability to understand the role of Sturton in the Pilgrim story as it relates to being the birthplace of key figures and the site of later preaching activity, likely in secret, by John Robinson.</p>
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	viability of present tourism and the growth potential which is demonstrably emerging.	
REP4-037/6	<p><b>6) Policy Alignment</b></p> <p><b>Sturton Ward Neighbourhood Plan Review:</b></p> <ul style="list-style-type: none"> <li>- Emphasises landscape character, rural openness, and historic environment protection (including settings).</li> <li>- Supports objections where development would harm long views, alter rural character, or diminish the setting of heritage assets.</li> <li>• NPPF Section 16 (paras. 199–202):</li> <li>- Requires that great weight is given to the conservation of heritage assets, including their settings.</li> <li>- Any harm must be clearly justified and outweighed by public benefits.</li> <li>-In this case, the heritage disbenefits are broad (associative, communal, landscape/setting, and economic/public value) and would be enduring, whereas public benefits from the scheme must be considered in light of reasonable alternatives and site selection that avoid high-sensitivity historic landscapes.</li> </ul>	<p>The Applicant has provided an assessment against the National Policy Statements (Appendix C) and local planning policy (Appendix D) of the Planning Statement [<b>REP2-040</b>].</p> <p>The relevant policies for determination are National Policy Statements (NPS') not the neighbourhood plan or the NPPF.</p> <p>The NPS EN-1 states at paragraph 5.9.28 that the Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. However, in this case, the intangible “Christian heritage” of the region is not a relevant heritage asset against which paragraph 5.9.28 would apply, and therefore regardless of the fact that the Applicant considers the Proposed Development has no effect on this intangible element, it isn’t a relevant consideration for the Secretary of State under the NPS paragraph 5.9.28.</p>
REP4-037/7	<p><b>7) Specific Assets and Networks Enhanced by Christian Heritage</b></p>	Noted, see comments to REP4-037/1.

	<ul style="list-style-type: none"> <li>• Sturton le Steeple Church: elevated in significance by links to Separatist/Baptist figures and as an interpretive anchor on multiple trails.</li> <li>• Hablesthorpe old churchyard and the bank/track to Sturton: a powerful experiential link where the narrative “lands” with visitors.</li> <li>• West Burton: part of the network of sites that contextualise the communities and movements.</li> <li>• Austerfield Manor House and Scrooby Manor: modest in fabric but major in associative value, illustrating why Sturton’s assets likewise carry heightened significance.</li> <li>• Worksop Priory Gatehouse (wider network): an example of newly recognised associations (e.g., Rhode Island founder link) showing the growing scholarly and public interest in the region’s dissenting/colonial connections.</li> <li>• Village-scale interventions (Pilgrim Sculpture, interpretation boards from Mayflower 400): these activate and amplify the heritage significance by helping the public understand and connect the story across the landscape.</li> </ul>	
<p>REP4-037/8</p>	<p><b>8) Conclusion</b></p> <p>Christian heritage is integral to the significance of heritage assets in and around Sturton le Steeple. It transforms individual buildings and places into a coherent historic landscape of international resonance, grounded in the lives</p>	<p>The Scheme would not repattern the landscape, but sits within the existing field patterns and existing or historic hedgerow lines.</p> <p>The Scheme does not interrupt views and routes between heritage assets related to Christian heritage. It is noted there are no tangible heritage assets within the Site or study area which are</p>

<p>and journeys of Separatists and early Baptists. That significance resides not only in the fabric of churches and historic sites, but in the experience of moving through a largely rural landscape whose character still allows the story to be read.</p> <p>The proposed scheme would materially diminish that significance: by repatterning the landscape, interrupting key views and routes, weakening the interpretive experience, and undermining an established and expanding tourism economy that relies on the authenticity and legibility of this Christian heritage landscape. As such, in our opinion, it would conflict with both the Neighbourhood Plan's heritage and landscape objectives and the NPPF's requirement to give great weight to the conservation of heritage assets and their settings.</p>	<p>directly related to the Pilgrim heritage and understanding of the evolution of the Pilgrim and Baptist faith. Therefore, there will be no interruption or diminution of views.</p> <p>The interpretative experience is not relevant to the assessment of heritage assets as it cannot be directly linked to a tangible heritage asset illustrating the Pilgrim movement.</p> <p>There is no evidence that economic factors such as the tourism economy will be affected by the Proposed Development.</p> <p>Due to the intangible element of Christian Heritage not being a heritage asset, the relevant policy considerations for heritage assets under the NPS EN-1 do not apply.</p>
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