POWER FOR GOOD

Steeple Renewables Project

Applicant Response to ExA Second Written Questions

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Applicant Responses to ExA Second Written Questions

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Table of Contents:

1 Introduction

1.1.1 This report responds to the Examining Authority's ('ExA') Second written questions, issued on the 03 March 2025 **[PD-008]**. It responds to each of the questions posed to the Applicant. The Applicant has not responded to specific questions posed to specific interested parties but will review those responses once available and may comment on those at Deadline 6.

1.1.2 Section 2 of this report is tabularised to include ExA's questions and a response to each question as follows:

- General and cross topic questions
- Need, site selection and alternatives
- Design, parameters and other details of the proposed development
- Biodiversity and ecology (including Habitats Regulations Assessment)
- Climate
- Cumulative effects and interactions with other projects
- Compulsory acquisition, temporary possession and other land or rights considerations
- Draft Development Consent Order
- Flood risk, drainage and the water environment
- Historic environment
- Land use and soils
- Landscape and visuals
- Population
- Transport and access
- Other planning topics (air quality)

2 Applicant Response to ExA Second Written Questions

ExQ	Respondent	Questions	Applicant Responses
1.	**General and cross-topic questions**		
Q1.0.1	The applicant	**Statements of Common Ground (SoCG)** The ExA notes that SoCG with the following parties have yet to be submitted: • Historic England • Network Rail • Nottinghamshire Fire and Rescue Service • Nottinghamshire Wildlife Trust The ExA requests copies of these, unsigned if necessary, and updates to any previously submitted SoCG at deadline 5 to allow the ExA to fully understand the areas where outstanding issues remain in the examination.	The Applicant can confirm that a signed SoCG with Nottinghamshire Wildlife Trust and Nottinghamshire Fire and Rescue Service has gone into examination at Deadline 5. With respect to Historic England the Applicant has not been able to obtain a signed SoCG. Due to substantive engagement between the parties on the draft SoCG, the Applicant has submitted an unsigned draft. The Applicant has alerted these parties to the fact that an unsigned version is being submitted. In relation to Network Rail, the Applicant has not obtained sufficient engagement from this party to enable the submission of an unsigned SoCG.
2.	**Need, site selection and alternatives**		
Q2.0.1	The applicant	**Grid Connection** Following the conclusion of the National Energy System Operator's recent review of grid connections (in December 2025), confirm the status of the grid connection agreement referred to in [APP-056] and [REP2-044]. In particular, provide an explanation of what the timescales for the offers confirmed under Gates 1 and 2 might mean for the delivery for the proposed development.	The Applicant can confirm that the Proposed Development has received a notification from NESO confirming its inclusion in Gate 2. Each Gate 2 notification also identifies the broad timescale of when the necessary wider transmission reinforcements associated with the grid connection. Phase 1 indicates that any wider transmission reinforcements required will be completed before the end of 2030. Phase 2 indicates that any wider transmission reinforcements required will be completed in 2031 or later. The Proposed Development was allocated to Gate 2 Phase 2, because this is when necessary wider transmission reinforcements will have been completed. This aligns with the current NESO grid connection contract which provides for commencement of operation in October 2029. It is expected that the same arrangements are to be provided for in the Gate 2 offer which is now expected to be received between September 2026 and January 2027. The BESS component of the Steeple Renewables Project has been allocated to Gate 1, an outcome that was expected given it's "in planning" status and one which is capable of being revisited when development consent is granted. The allocation of the BESS component to Gate 1 is independent of the solar element of the project.
3.	**The Environmental Statement (general)**		
Q3.0.1		No further questions at this stage.	
4.	**Design, parameters and other details of the proposed development**		
Q4.0.1	Applicant	**Detailed design** Please explain how the detailed design process will include a formal role for community representatives to input into the design?	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. Whilst community liaison is not equal to consultation, which carries with it an expectation on the part of the applicant for adjustments and amendments, 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 subject to full public consultation. These discharges will need to be done by professional, and statutory authorities. The Applicant strongly disagrees with any 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. The Applicant would refer the ExA to its response to NCC's deadline 4 submissions on this matter, row REP4-001/19.
Q4.0.2	The applicant	**ES Appendix 4.5 - Outline Design Principles** Explain why provision has not been included for the Outline Design Principles [APP-093] to be updated in the draft development consent order (dDCO) to a full design principles document?	The Applicant considers this unnecessary. The document entitled "Outline Design Principles" will feed into the full design of the Scheme. The document itself does not need to be updated to inform the detailed design process. Details are sufficiently controlled through the operation of requirement 3 which secures that relevant details of the scheme are submitted to and approved in writing by the local planning authority. The local planning authority will be able to look across at the document entitled "Outline Design Principles" to see how those principles are being carried forwards into the detailed design. It is not considered necessary to create a standalone "detailed design principles" documents to support this process. The outline design principles document is sufficient for this purpose of informing design.
5. Biodiversity and ecology (including Habitats Regulations Assessment)			
Q5.0.1	The applicant	**Environmental Improvement Plan 2023** Paragraph 5.4.39 of National Policy Statement (NPS) EN-1 states the Secretary of State should have regard to the aims and goals of the government's Environmental Improvement Plan 2023. The ExA notes the commentary on pages 107 and 108 of Appendix C: National Policy Accordance Table in the Planning Statement [APP-182] although it doesn't explicitly explain how the proposal has met the aims and goals of the plan. Please clarify this with specific reference to the sections of the plan.	At Deadline 2, the Applicant revised the Planning Statement **[REP2-040].** Furthermore, a comparison table was also provided in Appendix A (a tabularised comparison of changes to 2025 revised National Policy Statements NPS EN-1, NPS EN-3 and NPS EN-5 with 2024 versions and setting out any implications for the Proposed Development considered by the Applicant) of the Applicant Response to ExA First Written Questions **[REP2-052].** With regards Paragraph 5.4.39 the only change is the paragraph number to 5.4.40. The Environmental Improvement Plan (2023) aims to restore nature and improve the environmental quality of the air, our water and our land. It builds on both the 25 year Environment Plan and the Environment Act 2021. It contains 10 goals in total with an 'apex goal' of improving nature by halting the decline in our biodiversity so we can achieve thriving plants and nature. It sets out a five-year framework to improve natural environment, aiming to halt biodiversity decline, achieve clean air and water, reduce waste, and protect 30% of land and sea by 2030. **Improving Nature** Goal 1 (thriving plants and nature) targets to halt the decline in species abundance; restore or create more wildlife-rich habitats; Improve the Red List Index for England; New interim targets for all sites of special scientific interest (SSSIs); increase tree canopy and woodland cover; and 70% of designated features in Marine Protected Areas (MPAs) to be in favourable condition by 2042. These targets would be delivered by implement mandatory biodiversity net gain (10%) and support the creation of high quality native broadleaf and mixed woodlands. Other delivery mechanisms (Pay farmers and land managers; evolve a Countryside Stewardship scheme; Sustainable Farming Incentive; support the 22 Landscape Recovery projects; roll out Local Nature Recovery Strategies; restore our marine protected areas; deliver fisheries plan; Species Survival Fund; Green Finance Strategy; protect and restore globally critical landscapes; and establish a UK wetland inventory) are not relevant to the Proposed Development. Paragraphs 6.5.24 to 6.5.29 on pages

			63 to 65 of the Planning Statement **[REP2-040]** detail a range of 'designed-in' primary ecological mitigation, compensation and enhancement measures to improve nature are part of the design of the Proposed Development. Biodiversity features have been considered iteratively as the detail of the Proposed Development has evolved, and the incorporated biodiversity measures form an integral part of the Proposed Development, designed specifically to avoid or reduce biodiversity effects wherever possible, and to build biodiversity enhancement into the Proposed Development. The proposal, therefore, complies with relevant elements of goal 1. **Improving Environmental Quality** Three of the goals (goal 2 - clean air, goal 3 - clean and plentiful water, and goal 4 - managing exposure to chemicals and pesticides) operate under the heading of "improving environmental quality". Goal 2 (Clean Air) sets out key targets to reduce pollution including PM 2.5 found in dust from development sites as well as other key pollutants including nitrogen oxides (NOx), sulfur dioxide (SO2), volatile organic compounds (VOCs) that are released alongside PM 2.5 from other sources such as burning fossil fuels for energy generation. To deliver this goal measures include tackling domestic emissions and support the move away from petrol and diesel cars. Other deliveries relate to local authority powers, clean air zones, reducing emissions from shipping and farming practices reducing ammonia emissions that do not relate to this Proposed Development. The Applicant has incorporated standard measures for pollution prevention and dust management into ES Appendix 4.1 - outline Construction Environmental Management Plan **[REP3-011]** for the construction phase and ES Appendix 4.2 – outline Decommissioning Plan **[REP3-013]** for the decommissioning phase. During operation, Chapter 15 of the environmental statement considered the potential increase of concentrations of NO2, PM10, PM2.5 as a result of traffic movements to be negligible. The ES did not consider wider operations in its scope as the operations of the solar farm are unlikely to generate any risks to air quality due to it being a clean energy source, this is in contrast to other fossil fuel technologies. Goal 3 (Clean and Plentiful Water) sets out targets for reducing water pollution, reducing sewerage discharges as well as reducing water usage by tackling drinking water leakages. This goal is directed towards water companies, agricultural practices and protecting chalk streams. However, it does highlight that the government considers that Sustainable Urban Drainage Systems should be mandatory for new development. A Surface Water Drainage Strategy is proposed for the Proposed Development in ES Chapter 8 – Hydrology, Hydrogeology, Flood Risk and Drainage **[REP2 -018]** and ES Appendix 8.2 Surface Water Drainage Strategy **[REP3-021]** detailing appropriate use of a Sustainable Drainage System on site. The Applicant goes beyond mitigating its own impact on surface water drainage and has provided SuDS systems to provide a betterment for Sturton-le-Steeple against existing surface water pressures. Goal 4 (managing exposure to chemicals and pesticides) relates to substantially increase the amount of persistent organic pollutants (POPs) material being destroyed, eliminate the use of polychlorinated biphenyls (PCBs) by 2025, reduce land-based emissions of mercury, and contribute to the global target of reducing pollution risk by 2030. This would be delivered by addressing the risks of chemicals, improve understanding of chemicals, farming practices, increase the uptake of mercury abatement technology and Work with international partners to raise global standards for chemicals management. Goal 4 is not aimed at the Proposed Development. **Improving Our Use of Resources** Two goals (goal 5 - maximising our resources, minimise our waste and goal 6 - using resources from nature sustainably) operate under the heading of improving our use of resources. Goal 5 (maximising our resources, minimise our waste) seeks to eliminate avoidable waste by 2050, near elimination of biodegradable municipal waste to landfill, eliminate avoidable plastic waste, eliminate waste crime and half residual waste. This would be delivered by boosting recycling, shifting cost of packing waster to packaging producers, improve packaging signage, ban supply of single use plastics and elimination of biodegradable municipal waste going to landfill. ES Chapter 17: Miscellaneous **[APP-074]** sets out disposal of waste generated by the Proposed Development would be in accordance with the waste hierarchy (prevention, reuse, recycle, other

			recovery). Waste disposal via landfill would be a worst case last choice scenario with nearly all waste streams generated during all phases of development capable of reuse or recycling disposal methods. The Proposed Development therefore aligns with the targets of goal 5. Goal 6 (using resources from nature sustainably) targets halt/reversal of forest loss and land degradation globally; ensure fish stocks are recovered and maintained; through farming practices 40% of England's agricultural soils are sustainable managed by 2028 and deliver a sustainable nature positive affordable food system. This would be delivered by making it illegal for business to use key forest risk commodities grown on land illegally occupied or used; packaging measures to protect forests internationally, implement fisheries management plan and incentivise farmers and land managers to improve soil health. Goal 6 is not aimed at the Proposed Development, although the Applicant has made sure that its Proposed Development features a design which looks to preserve soil quality. The Applicant's ES Chapter 15 (Agriculture and Soil) demonstrates that the temporary nature of the development, and the decommissioning obligations will ensure that apart from areas of tree planting and pond creation, there isn't a significant effect on soils. In relation to the areas of tree planting, that also can be seen to align with the targets of this goal as it is improving tree cover in the UK. **Improving Our Mitigation of Climate Change** Two goals (goal 7 – mitigating and adapting to climate change and goal 8 – reducing risk of harm from environmental hazards) operate under the heading of improving our mitigation of climate change. Goal 7 (mitigating and adapting to climate change) targets a UK-wide legally binding target of net zero emissions by 2050, and works to set out measures to limit global warming to below 2 degrees celsius compared to pre-industrial levels, and aiming for 1.5 degrees under our presidency of the UN Climate Summit COP26. The Proposed Development will generate a significant amount of low carbon electricity energy source over its operational lifetime due its scale and, along with the co-located BESS, it will provide resilience, security and affordability of supplies. It will be a key contributor towards the government achieving its aims and legal commitments of Net Zero by 2050 as well as a critical component of the national renewable energy generation and energy mix portfolio required to decarbonise the country's national energy supply quickly. ES Chapter 12 **[APP-070]** confirms over the lifecycle of the Proposed Development there will be a saving of 1,380,000 tCO2e. Goal 8 (reducing risk of harm from environmental hazards) commits to investing in flood and coastal defence projects to better protect more properties; double the number of government funded projects which include nature-based solutions to reduce flooding and coastal erosion. The Applicant has designed a scheme which ensures that risks of flooding, factoring in risks from climate change, have been appropriately considered and mitigated for. **Improving Our Biosecurity** Goal 9 (enhancing biosecurity) commits to reducing the number of establishments of invasive non-native species, and seeks to eradicate the highest risk invasive species. Paragraphs 3.6 to 3.9 of outline Landscape Ecological Management Plan (oLEMP) **[APP-166]** sets out new habitat creation and planting that is proposed. The Applicant is committed to deliver habitats that are locally appropriate to the area, suitable for the soil conditions and topography and comprise native species that are typical of the area (not imported alien species that can result in a biosecurity concern). This includes individual native hedgerow tree planting, orchards and small woodland copses. Figure 6.9 Landscape and Ecological Mitigation Strategy **[APP-160]** shows the existing hedgerow resource across the Site and sets out the intended locations of new planting. Paragraph 7.2.59 of ES Chapter 7: Ecology & Biodiversity **[REP3-009]** confirms during the onsite field surveys; Canadian waterweed (invasive plant species) was observed within Mother Drain in the east of the Site. No works will be undertaken within the channel of the Mother Drain and the spread of Canadian waterweed is therefore highly unlikely to take place. Works within water will be limited

			to localised access crossings, at watercourse where no INNS have been recorded. Notwithstanding this, Appendix 4.1 - Outline Construction Environmental Management Plan **[REP3-011]** includes a section on the species measures to avoid accidental spread. Appendix 4 Table 7.9 on page 151 of ES Chapter 7: Ecology & Biodiversity **[REP3-009]** confirms an INNS Management Plan will be provided post-consent as secured by requirement 6, 7, and 21. **Improving the Beauty of Nature** The targets set out under Goal 10 (enhanced beauty, heritage, and engagement with the natural environment) do not directly relate to the Proposed Development. However, the ethos of the goal to enhance access to nature and green spaces. Paragraph 7.16 on page 84 of the Planning Statement **[REP2-040]** highlight benefits that will be delivered by the Proposed Development. These include social (including creation of two permissive paths for the operational life of the Proposed Development and creation of two surface water detention basins reducing flood risk to the village of Sturton-le-Steeple by intercepting and storing overland flow) and environmental (including in surface water drainage, flood attenuation, natural wetland habitat, 10 % biodiversity net gain and water quality management). These social and environmental benefits will enable continued access to nature and the local landscape whilst assisting nature restoration so that its beauty can be enjoyed responsibly. Therefore the proposal complies with relevant elements of goal 10.
Q5.0.2	The applicant	**Information to inform a Habitats Regulations Assessment** The updated document submitted at deadline 2 **[REP2-016]** omits appendices 1 and 2 that were contained in the previous document **[APP-180].** For completeness, and to avoid uncertainty, please submit a full updated document containing the previous appendices.	The Applicant can confirm the information to inform a Habitat Regulation Assessment submitted at Deadline 2 has been re-submitted at Deadline 5 with appendices from the previous original document.
Q5.0.3	The applicant	**Effects to brown hares** Please respond to the concerns raised by Fields for Farming [REP4-010] on the effect to brown hares from predators as a consequence of the proposed development.	The proposed development will lead to continuous swathes of permanent habitat that is diverse in structure, cover and foraging opportunities year-round. This is in contrast with the existing arable farmland which is more intensively managed and comparatively homogenous, and with less stable conditions for brown hares due to regular cultivation and management. This difference leads to greater year-round opportunities for brown hare within the solar landscape at solar farms. A review of radiotracking and accelerometer studies of brown hares in Dutch solar farms has been undertaken. The studies used camera trapping and GPS surveys to understand activity patterns of brown hares and foxes (Tavernier et al., 2026 – in preparation). The research concluded that: • *"Hares increase their use of solar fields when predation pressure increases"* • *"…daily activity patterns of foxes and hares had little overlap inside solar fields"* • *"This shows that solar fields may be perceived by hares as safer habitats than farmlands with respect to fox predation. The heterogeneous vegetation structures and the clutter created by solar panels may provide both cover and visibility, supporting the hares' reliance on vigilance, concealment, and short flight-induced distance to avoid predators"* This study strongly suggests that foxes and other predators have no greater success predating hares at solar farms than they do in farmland. Further literature relating to the relative abundance of hares at solar farms is provided below. Observations of mammals have been made as part of national ecological monitoring programmes at solar farms – such as Solar Energy *UK's Ecological Trends on Solar Farms UK* monitoring series. In Solar Energy UK (2024), it is stated that:

			"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."* Other research confirms that brown hares are more abundant at solar farms compared to agricultural control sites. Montag *et al.* (2016) concluded: *"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."* References: Montag, H., Parker, G., & Clarkson, T. (2016) *The Effects of Solar Farms on Local Biodiversity; A Comparative Study.* Clarkson and Woods and Wychwood Biodiversity. Solar Energy UK (2024) *Ecological trends on solar farms UK*. Prepared by Solar Energy UK, Clarkson & Woods, Lancaster University, and Wychwood Biodiversity. Tavernier, C. ,Mulder, M. R., Weterings, M.J.A, Buij, R. ,van Langevelde, F. and Nuijten, R. (2026) Solar fields provide diurnal habitat for European hares (*Lepus europaeus*) within the intensive agricultural landscape. Preprint article not yet peer-reviewed and published. Available at SSRN: https://ssrn.com/abstract=6021220 or http://dx.doi.org/10.2139/ssrn.6021220
6. Climate			
Q6.0.1	The applicant	**Greenhouse gas (GHG) reduction strategy** In response to the requirements of paragraph 5.3.7 of NPS EN-1, the Planning Statement [REP2-040] (page 86 of appendix C) comments that the Outline Construction Environment Management Plan (CEMP) (ES appendix 4.1) [APP-089] and Outline Decommissioning Plan (ES appendix 4.2) [APP-090] identify a range of mitigation measures that have been embedded into the scheme to limit GHG impacts. Clarify if these documents are a substitute for a GHG Reduction Strategy, which is not explicitly proposed? If not, please submit one.	The Applicant is not intending to submit a separate GHG Reduction Strategy. It is correct that the oCEMP and oDP are substituting the requirement of the NPS EN-1 para 5.3.7 that steps taken to minimise and offset emissions are secured under the Development Consent Order. The Applicant is confident that it's approach is aligned with wider industry practice. A review of the four most recently granted solar DCOs (Fenwick Solar Farm, Helios Renewable Energy Project, Stonestreet Green Solar, Tillbridge Solar Project) all follow a similar methodology to the Applicant which is to embed mitigation measures in a centralised management plan. Reference to the NPS Accordance Trackers for each of those documents evidences this approach.
Q6.0.2	The applicant	**Steps to reducing GHG emissions** In response to the requirements of paragraph 5.3.9 of NPS EN-1, the commentary in the Planning Statement [REP2-040] (pages 86 and 87 of appendix C) focuses on the high level GHG savings of the proposed development stating that the GHG impact during construction, operation and decommissioning is assessed as being minor adverse and not	The Applicant's Environmental Statement does not predict a significant adverse environmental effect with regard to GHG emissions. Whilst the primary purpose of EIA is to address significant adverse effects, minor impacts may still require mitigation to ensure that they are properly managed, controlled, or reduced, particularly to comply with regulation/accepted good practice. For this reason, mitigation measures for the construction and decommissioning phases have been considered. However, given the inevitable level of uncertainty associated with the detail of the proposed mitigation measures at this stage of the project, quantifying the effects of the proposed measures and then applying this to determine residual effects post mitigation would introduce a level of inaccuracy to an otherwise robust reasonable worst-case assessment. This would, in turn, result in a less robust calculation of the 'carbon payback'

		significant, with the overall GHG impact as beneficial and significant. This does not appear to explain clearly the steps taken to reduce emissions at each of these phases. The ExA notes the list of measures in paragraph 12.8.2 of Environmental Statement (ES) chapter 12 and table 3.1 of the Outline CEMP [APP-089] although they appear somewhat generic in content. Provide further details of all reasonable steps that the applicant has taken to reduce the GHG emissions of the construction and decommissioning stage of the development and the extent to which stated measures would reduce GHG emissions.	period (the time required for the project to offset the greenhouse gas emissions generated during the manufacturing, transport and construction phase). This approach is considered to reflect wider EIA good practice and to comply with the IEMA Environmental Impact Assessment Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance (updated 2022). The lead author for the ES chapter is a member of the ISEP Working Group responsible for the implementation and review of this guidance. Whilst the ES does not rely on the mitigation measures for its assessment conclusions, it is important to note that the Applicant is bound to observe the mitigation measures due to the management plans being secured in the DCO as follows. During construction Table 3.1 (climate change) on pages 7 and 8 of the outline CEMP **[REP3-011]** outlines potential impacts from climate change. This includes GHG emissions managed through appropriate standard and good practice control measures as well as monitoring requirements that will be confirmed in the detailed CEMP secured by Requirement 7 of the dDCO **[REP3-005].** Mitigation and enhancement measures in Table 3.1 (climate change) of the outline CEMP **[REP3-011]** set out reasonable steps to reduce GHG emissions. These include: • Increasing recyclability by segregating construction waste to be re-used and recycled where reasonably practicable. This would likely be achieved on site through a dedicated waste storage area and waste segregation on site with dedicated bins/skips/containers for different waste streams to ensure as much waste as possible is recycled or reused. Increasing recyclability by segregating construction waste for reuse and recycling directly reduces GHG emissions by minimizing the energy-intensive process required to extract, manufacture, and transport new “virgin” materials. Proper on-site segregation turns waste into a valuable resource for the wider circular economy, reduces landfill dependency, and decreases methane emissions from organic waste decomposition. • Adopting the Considerate Constructors Scheme (CCS) to assist in reducing pollution, including GHGs, from the Proposed Development by employing good industry practice measures. By adopting the CCS the Proposed Development would become a “registered site”. The CCS helps reduce GHG emissions by mandating that registered sites, companies and suppliers adhere to a Code of Practice that practises decarbonisation, energy efficiency, and waste reduction. • Minimising the creation of waste and maximise the use of alternative materials with lower embodied carbon, such as locally sourced products and materials with a higher recycled content where feasible. Minimising construction waste and prioritising low-embodied-carbon, locally sourced and recycles materials reduce GHG emissions primarily by lowering the “upfront” carbon footprint – the emissions locked into the development before it is occupied. Minimizing construction waste avoids double emissions (manufacture and transport material plus transport and process of waste through landfilling or incineration); prioritising locally sources products cuts “carbon miles”, lower upfront costs; and maximising materials with high recycles content bypasses extraction/refining and industrial symbiosis. • Reusing suitable infrastructure and resources already available within the Sites where possible to minimise the use of natural resources and unnecessary materials. Reusing suitable infrastructure and resources already available within sites minimises the need for virgin material extraction, manufacturing and transport, which directly reduces GHG emissions by cutting energy-intensive processes (a core principal of the circular economy which is estimated to be able to reduce construction waste emissions by up to 38% by 2050 as confirmed by the Ellen Macarthur foundation - https://www.ellenmacarthurfoundation.org/topics/built-environment/overview#:~:text=By%20rethinking%20the%20way%20we,manage%20resources%20and%20create%20value.

			• Liaising with construction personnel for the potential to implement staff minibuses and car sharing options. This has the potential to significantly reduces GHG emissions – specifically commuting emissions – by decreasing single-occupancy vehicle journeys, and lowering total vehicle miles. • Switching vehicles and plant off when not in use and ensuring construction vehicles conform to current EU emissions standards. This reduces GHG emissions primarily by eliminating unnecessary fuel consumption during idling (when engines burn fuel inefficiently – sometimes twice the exhaust emissions as in motion – while performing no useful work. Compliant EU engines improve fuel efficiency and reduce harmful emissions. • Conducting regular planned maintenance of the construction plant and machinery to optimise efficiency. This reduces GHG emissions primarily by improving fuel combustion, reducing energy waste, and extending the operational life of equipment. Proactive maintenance is widely understood to improve fuel efficiency. During decommissioning, table 3.1 of the outline DP **[REP3-013]** confirms the same measures proposed for the construction phase (as outlined previously) will also be adopted for the decommissioning phase in respect of Climate Change (unless other measures are required by relevant legislation and guidance at decommissioning stage). Requirement 21 of the dDCO **[REP3-005]** secures Decommissioning and Restoration.
7.	**Cumulative effects and interactions with other projects**		
7.1	**Cumulative effects**		
Q7.1.2	The applicant	**Residential development** Reference was made during ISH 2 under agenda item 5 [EV7-004] to a residential development for 9 houses being granted planning permission in Sturton le Steeple, close to the proposed battery energy storage system (BESS) compound. Confirm whether this proposed development has been included in the assessment of cumulative effects. If not, provide an updated assessment.	The Application for 9 residential dwellings on North Street (25/01026/FUL | Demolish Three Barns and Storage Tank Change of Use of Agricultural Yard into Residential Development for 9 Dwellings | Land And Buildings East Of North Street Farm North Street Sturton Le Steeple Nottinghamshire DN22 9HP) was validated on 18th Sep 2025 and determined on 5th February 2026. As the new housing development came forward after the DCO submission was made. NSIP: Advice on Cumulative Effects Assessment (2025) confirms that a proportionate approach should be undertaken to confirming which cumulative sites would require cumulative impact assessment as part of 'Stage 2: Establishing a shortlist of other existing and, or approved development'. One of the criteria for considering which schemes would require assessment is the 'Scale and nature of development' where the guidance suggests 'EIA screening thresholds may be of assistance'. The ES set out the criteria which were applied to the shortlisting of cumulative sites at paragraph 2.15.20 of Chapter 2 **[APP-060]**. This noted that for residential developments, those comprising of more than 150 dwellings would be those most likely to require consideration in the cumulative impact assessment, in line with the EIA screening thresholds. Given that application 25/01026/FUL was for only 9 dwellings, and it relates to land which is already covered by built development in the form of agricultural dwellings, it is not considered that the application would meet the requirements for inclusion in the detailed cumulative impact assessment. It is the Applicant's position that there would be no potential for any significant cumulative effects with regard to application 25/01026/FUL.
7.2	**Interactions with the proposed North Humber to High Marnham (NHMH) project**		
Q7.2.1	The applicant	**Consideration of NHMH project** Paragraph 27 of National Grid Electricity Transmission's Plc (NGET)'s deadline 3 submission [REP3-053] states "Unfortunately, to date the Applicant has been unwilling to meaningfully engage in such co-operation, preferring instead to	The Applicant refutes NGET's assertion that it has failed to meaningfully engage with NGET in relation to the interaction between the Proposed Development and NGET's NHHM project. The Applicant has engaged proactively, meaningfully and regularly with NGET on the potential interaction between the two projects since 2023. This has included a number of meetings between the respective engineering and project management teams as well as engagement at principal level between Karl O'Mullan, RES Development Director – Solar, and Monica Corso Griffiths, NHHM Project Director.

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<td>simply assert that NGET should route the NHHM Project to avoid the SR Project entirely.” Paragraph 41 states similar. Noting the figures contained in part 1 of appendix D in [REP2-052] and the maps in [AS-022], which illustrates the referred to western and eastern corridor routes and shows the possibility of likely interactions between the two schemes early in the consultation process, to what extent has the proposed development sought to

accommodate the proposed NHHM Project as part of the site selection and iterative design process? If not, explain why not.</td>
<td>The premise of the ExA’s question appears to be that the potential for NGET to select an eastern corridor route in the vicinity of the Proposed Development has been apparent for some time and that the Applicant could or should have made efforts to accommodate that route through its site selection or iterative design processes. The Applicant directs the ExA’s attention to the chronology of events contained in REP2-052, which describes the evolution of NGET’s NHHM project. This can be compared to the design evolution of the Proposed Development to understand the extent to which it would have been reasonable for the Applicant to accommodate NGET’s now preferred route by selecting a different site or through iterative design of the Proposed Development.

The three key stages of evolution of NHHM are set out below, compared to where the Proposed Development was at that time:

<table>
<tr><th>NHHM Project</th><th>Steeple Renewable Project</th></tr>
<tr><td>June - July 2023 – NGET carried out non-statutory consultation on the NHHM Project.

NGET identified a “graduated swathe” (essentially, a visual representation of NGET’s preferred option corridor indicating where the OHL alignment could be routed). In the vicinity of the Proposed Development, the graduated swathe was to the west of Sturton le Steeple and North Leverton and to the west of the railway (see sheet 7 of AS-022)</td><td>At this stage, the Proposed Development not yet in the public domain but preparatory design work was underway.

NGET’s preferred route for the NHHM project lay to the west of the railway line, resulting in only a limited impact with the Proposed Development. As such, there was no reason for the Applicant to consider alternative sites or changes to the design or layout of the Proposed Development.</td></tr>
<tr><td></td><td>October 2023 - the Proposed Development came into the public domain through early information consultation.
In December 2023, a meeting was held between the Applicant and NGET to discuss potential interactions between the two projects. A further meeting was held in April 2024 to discuss these interactions. During this time, NGET’s preferred route remained to the west of the railway line and so interactions were limited.</td></tr>
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			July – August 2024 – NGET carried out localised consultation on the NHHM project At this stage, NGET presented a potential alternative route corridor between South Wheatley and High Marnham, referred to as the "eastern corridor". This ran closer to the west of Sturton le Steeple than the previous western corridor and then passed to the east of North Leverton (rather than to the west, as shown in the previous non-statutory consultation) (see sheet 9 of [AS-022]). NGET's localised consultation made it clear that it had made no decision on whether to progress the eastern or western corridors.	By this stage, the Proposed Development was in the public domain and preparation of the PEIR was underway for statutory consultation. NGET's localised consultation advanced two potential routes (an eastern and western corridor) and invited comments on those potential routes. The eastern route was not advanced by NGET as a preferred route as compared to the graduated swathe identified in its non-statutory consultation. No details of the likely route alignment were provided by NGET at this stage. In circumstances where NGET was simply identifying two potential routes in the vicinity of the Proposed Development with no expressed preference for either option, there was no reason at this stage for the Applicant to consider alternative sites or investigate design amendments to accommodate an eastern NHHM route. In August 2024, the Applicant submitted a response to the localised consultation, objecting to the eastern route and explaining that it would result in greater impacts to the Proposed Development and also to local villages, the landscape and traffic	

				than the western route **(see REP2-052 at pdf 324).**	
				January – March 2025 – the Applicant carried out statutory consultation in respect of the Proposed Development. NGET responded to the consultation, encouraging the ongoing discussion and consultation between the two parties to be maintained on interactions between the two projects. Clearly, at this stage, NGET was satisfied that meaningful engagement was taking place between the parties and encouraging its continuation.	
				February – April 2025 – NGET carried out statutory consultation on the NHHM project. For the first time, NGET now showed an amended route which passed through part of the eastern corridor (shown in the 2024 localised consultation) and part of the western corridor (shown in the 2023 non-statutory consultation)	By this point, the Applicant was already undertaking statutory consultation on the Proposed Development with an appropriately detailed design. NGET's route proposal published at statutory consultation was a previously unheralded route to the east of and parallel to the railway, utilising part of the "eastern corridor" part "western corridor" as well as land never previously identified by NGET for the NHHM alignment. In response to NGET's statutory consultation, the Applicant

				provided a detailed response, opposing the new alignment proposed by NGET on the reasonable basis that this was a new suggestion and one that was not remedying any obvious or insurmountable issue with the graduated swathe route. A meeting also took place between NGET and the Applicant in May 2025, to explain the impacts of NGET's current route on the Proposed Development. The landowner also responded to NGET's statutory consultation, proposing an alternative route, to the west of the railway line and within the original graduated swathe. There was no reason for the Applicant to consider alternative siting or change to the Proposed Development layout as a response to the NHHM statutory consultation. Indeed, given the significant change of NGET's proposed routing as compared to the corridors previously consulted upon, it is clear that any previous attempts by the Applicant to accommodate the NHHM project would have been worthless as the route now identified by NGET was a new unheralded route. The Applicant's position was that a reversion to the previously preferred graduated swathe would	

				have fewer impacts on the Proposed Development as well as on the environment. That remains the Applicant's position. Therefore, in advance of seeing any reasoned reply to that Applicant's response to the NHHM statutory consultation there was no reason for any changes to the Proposed Development.	
				June 2025 – the Applicant's DCO was accepted for examination. By this stage, the Applicant had not received any response from NGET to its objection to the eastern corridor. It was only in NGET's Relevant Representation [RR-049] that NGET signified its intention to proceed with the new alignment, in spite of the representations of the Applicant (and the landowner). NGET's Relevant Representation was first available to the Applicant on 02 September 2025. By that stage, the Applicant's DCO application had been submitted and accepted for examination. The Applicant did not consider it appropriate at this stage to consider alternative sites or amend its design of the Proposed Development to accommodate NGET's now preferred alignment because it remained of the view that the	

				NHHM project should be routed to the west of the railway line. However, the Applicant requested a meeting with NGET to discuss its Relevant Representation. That meeting took place on 11 September 2025, at which NGET indicated that it would not amend its now preferred route.	
			March 2026 – NGET is yet to submit an application for development consent for the NHHM project. NGET has recently concluded further consultation on the project. The outcome of those consultation exercises is not yet known because no application has been submitted and the consultation reports have not been published. However, for the statutory and recent consultation to be lawful, they must have been undertaken at a time when the NHHM proposals were at a formative stage and all responses must conscientiously be taken into account in finalizing the proposals. Plainly that means there must be scope for changes to the route alignment to change.	March 2026 – the Applicant's DCO application is now well into its fourth month of examination. The scope to identify alternative sites or to modify the design of the Proposed Development is plainly limited at this stage of the process. Furthermore, the Applicant remains of the view that an alternative route is available to NGET that would be acceptable in environmental and technical terms and would significantly reduce the impacts of the NHHM project on the Proposed Development. Given the comparative progress between the two projects, it will be for NGET to justify its proposed route alignment and secure necessary powers of acquisition if it remains unwilling to revert to its previously preferred route, to the west of the railway.	
			The Applicant considers that it is evident from the above chronology that there can have been no reasonable expectation that it should have revisited its site selection process or amended its layout or design to accommodate NGET's varying proposed routes for the NHHM project. NGET's currently preferred route was only published for the first time following commencement of the Applicant's statutory consultation. Until the Applicant received NGET's Relevant Representation on the Proposed Development, it remained optimistic that NGET would be willing to revert to its previously preferred route particularly given the offers made by the landowner to accommodate		

			that route on favourable terms to NGET. Notwithstanding its disappointment with NGET's approach, the Applicant has continued to engage meaningfully with NGET throughout the examination period in an attempt to narrow and resolve issues, where possible.
Q7.2.2	The applicant	**Effect with Wood Lane proposal** Figures have been provided in your deadline 2 submission [REP2-052] (part 2, paragraph 2.5) on the anticipated impacts in the event the NHHM alignment follows the 'Landowner Alternative Route'. Can the applicant explain the extent to which this route would affect the Wood Lane solar farm proposal in comparison to the statutory consultation route?	The Landowner Alternative Route would interact with the Wood Lane solar farm to some degree. The length of the LAR within the Wood lane project is 957m, temporarily sterilising 9.5ha and permanently sterilising 4.1ha. However, overall the Landowner Alternative Route would result in less energy lost because NGET's statutory consultation route has a greater impact on the energy generation of the Proposed Development than the Landowner Alternative Route would have on the energy generation of the Wood Lane solar farm. Furthermore, it is important to note that permission was granted for the Wood Lane solar farm in 2020. The interest in the site was sold by Elgin to Scottish Power in 2023. While the permission has been implemented, no development has taken place and the grid connection has now lapsed so it could not be connected to the grid until such time as a new grid connection offer is secured. The lease in favour of Scottish Power has also lapsed and the Applicant understands that the landowner served notice such that Scottish Power now has no interest in that land at all. As such, the Wood Lane solar farm land belongs to the landowner and his expressed preference is to route the NHHM project in accordance with the Landowner Alternative Route. It is not clear to the Applicant why NGET's priority should be to avoid the Wood Lane solar scheme which has a capacity of 49.9MWac and in respect of which no development has taken place since permission was granted in 2020 (other than to implement the permission) rather than avoiding the Proposed Development which is nationally significant with a capacity of 600MWac.
Q7.2.3	The applicant, SNSE Limited and SNSED Limited	**'Landowner Alternative Route'** Reference has been made in submissions [REP2-052] and [REP4-013] (SNSE Limited and SNSED Limited) to a preferred western corridor route for the NHHM project or alternative route. Noting figure D on page 13 of NGET's deadline 3 submission [REP3-053] that these routes would also appear to require land within the order limits, please confirm whether this route would also require the benefit of protective provisions to be secured on the face of any consented order for the proposed Steeple Renewables development to secure any future route that could be proposed? If not, explain why not.	The Applicant's position, as set out in REP2-052; at ISH3 and in the Applicant's written summary of oral submissions at REP4-031 is that it is not appropriate to include protective provisions for the protection of future NGET assets on the face of the Steeple Renewables DCO. In summary, that is because to the extent that NGET requires land comprised in the Applicant's Order Limits to deliver its proposed NHHM project, the appropriate procedure is for NGET to seek the necessary compulsory acquisition powers through its own DCO application in due course, which would require justification in the public interest and which, if confirmed, would trigger the requirement to pay compensation. It is not appropriate for NGET, in practical terms, to safeguard or seek to compulsorily acquire land by the back door through protective provisions on this DCO without having established a case for doing so in the public interest and which, on NGET's preferred terms, would not engage any requirement to pay compensation. However, without prejudice to that position, the Applicant has made it clear that an alternative route, running to the west of the railway line (as proposed in the Landowner Alternative Route) would reduce the impacts of the NHHM project on the Proposed Development. The Applicant has particularised the relative impacts of applying the protective provisions sought by NGET to (a) NGET's currently preferred route and (b) the Landowner Alternative Route in Part 2 of Appendix D of **[REP2-052].** In summary (and without prejudice to its primary position that it is not appropriate to impose protective provisions in respect of future NGET assets), if NGET's protective provisions were applied only to the area of overlap comprised in the Landowner Alternative Route (to the west of the railway), smaller areas of panel arrays would be affected; construction access for the NHHM project would be taken further to the west and so would reduce interaction during construction; and for both of those reasons there would be far less delay to the Proposed Development's design finalisation and construction.
Q7.2.4	NGET	**'Landowner Alternative Route'** Paragraph 28 of your deadline 3 submission [REP3-053] states you will provide figures of the affected land for what the applicant refers to as the	The Applicant notes this question is directed to NGET but. for the avoidance of doubt, the Applicant supplied its estimate of these figures affected by the LAR in its D2 submission **[REP2-052]** Appendix D Part 2 para 2.5 at page 315 of that appendix.

		"Landowner Alternative Route". Provide those figures.	
Q7.2.6	NGET and the applicant	**Need for protective provisions** If protective provisions were not applied as part of any consented DCO for the proposed Steeple Renewables development, what effect (if any) could this have on any land rights requests as part of the proposed NHHM application? If NGET would be required to apply for acquisition of rights as part of any future DCO application for the NHHM project in any case, explain the purpose of seeking and securing the protective provisions you require (aside from any need case argument). Conversely, if protective provisions were to be applied to any consented DCO for the proposed Steeple Renewables development**,** could the application of protective provisions in favour of NGET result in unnecessary duplication if compulsory acquisition of land or rights is sought and later consented as part of any future application for the proposed NHHM project? Whilst primarily addressed to NGET, the applicant is also invited to provide any comments to this question.	The Applicant understands that any application for development consent by NGET will include powers of compulsory acquisition to enable NGET to secure the land rights necessary to enable the construction and operation of the NHHM project. Absent some future voluntary agreement with landowning interests, NGET will also require compulsory acquisition powers over land where it interacts with the Proposed Development. There must be significant doubt that NGET will secure all necessary land interests voluntarily, not least given the landowner's strong objection to NGET's currently preferred route, as expressed through this examination. The Applicant's position remains that it is inappropriate for NGET to secure protective provisions for future assets on the face of the Steeple Renewables DCO. In the event that NGET does continue with its preferred alignment, the appropriate procedure is for it to seek the necessary compulsory acquisition powers through its own DCO application in due course, which would require justification in the public interest and which, if confirmed, would trigger the requirement to pay compensation. It is clear from its submissions [REP3-053 pdf 15] that NGET recognises that this is an option open to it, because it has said "In the absence of suitable PPs…..the NHHM project would need to address the interaction between the 2 projects through its own DCO application". It is not appropriate for NGET, in practical terms, to safeguard or seek to compulsorily acquire land by the back door through protective provisions on this DCO without having established a case for doing so in the public interest and which, on NGET's preferred terms, would not engage any requirement to pay compensation. Protective provisions attached to the Steeple Renewables DCO cannot grant the necessary land rights to NGET. As such, NGET will have to seek powers of compulsory acquisition regardless of the imposition of protective provisions on the Steeple DCO. Depending on how those protective provisions were drafted, in terms of prohibiting development of the Steeple Renewables project that conflicted with NHHM, the existence of those protective provisions might alter the case NGET would need to establish to have those CA powers confirmed. In light of which it is correct to say that imposition of protective provisions in favour of NHHM on the face of a confirmed Steeple Renewables DCO would be, in part, duplicating the operation of those future NHHM CA powers. It is also correct to say that imposing protective provisions as proposed by NGET would pre-judge the case for confirmation of any CA powers in favour of NHHM before NGET has made any application for such powers or advanced its case in support of doing so.
Q7.2.7	NGET and the applicant	**Protective provisions** In the event that protective provisions may be imposed in favour of NGET in respect of the proposed NHHM project on any consented DCO for the proposed Steeple Renewables development, should the provisions be accompanied by a plan that specifically identifies areas that may be affected? If not, explain why not.	The draft protective provisions proposed by NGET **[RR-049 at pdf 10]** do not define the NHHM route by reference to a plan or with any degree of specificity at all. In NGET's proposed PPs, the NHHM project is defined simply as a new high voltage transmission line and associated works between Creyke Beck in Yorkshire and High Marnham in Nottinghamshire. The precise route is not specified or defined in the proposed PPs but the Project is defined to include land on which NHHM apparatus is situated and land on which such apparatus is anticipated to be situated for the construction, use or maintenance of the project. The scope of the definition is extremely broad and would encompass any future design changes to the project. Clause 7(2) prevents the undertaker from acquiring any land forming part of the NHHM project without NGET's consent. The extent of that land is not specified or defined by reference to any plan because NGET does not yet know how much land it will require and is yet to undertake its detailed design. Without prejudice to its primary argument that no protective provisions should be imposed in favour of future NGET assets, the Applicant acknowledges that the potential adverse effects to the Steeple Renewables Project would be reduced to some degree if a plan were used to limit the effect of those protective provisions to the NGET proposed NHHM OHL route. However, the Applicant wishes to be clear that protective provisions even limited to a specific route would still result in adverse effects to the Proposed Development because of the uncertainty they create over timing of development i.e. when and for how long NGET

			could prevent the Steeple Renewables development from proceeding in this area and in any area where development is dependent upon those construction activities being able to proceed. The Applicant's understanding of NGET's protective provision drafting is that it does not limit their effect to any area (save that by definition it can only apply to the Steeple Renewables order limits) or to any time period, in order to give NGET increased flexibility in the design, promotion and eventual construction of the NHHM project.
8.	**Compulsory acquisition, temporary possession and other land or rights considerations**		
Q8.0.1	The applicant	**Funding** With reference to your answer to ExQ1. 8.0.4 [REP2-052] funding. Explain how all decommissioning costs are secured in the dDCO?	Decommissioning costs are not "secured" in a dDCO in the same way that construction costs are not "secured". Article 41 of the dDCO functions to secure adequacy of funding for compulsory acquisition costs because the policy tests for those costs are different to the policy tests for the capital expenditure for the non-land costs of the scheme. The Applicant has confirmed in its response at ExQ1 8.0.4 that its cost estimate for the scheme includes decommissioning and restoration. Again, in that response, the Applicant has set out the different policy tests for funding and why it does not need to "secure" decommissioning costs under policy requirements.
Q8.0.2	The applicant	**Justification – Areas under existing overhead power lines** With reference to your answer to ExQ1. 8.0.10 - Justification – Areas under existing overhead power lines [REP2-052]. It is unclear from your response whether you need compulsory acquisition (CA) of different plots for decommissioning as opposed to construction and maintenance and if so, why?	The Applicant, in its response to ExQ1 8.0.2, did not intend to convey any suggestion that different plots are required for decommissioning. By stating that "land will be actively occupied by the Applicant during the construction operation and decommissioning of the proposed scheme" the Applicant was conveying that the land is required for the full lifetime of the development.
Q8.0.3	The applicant	**Justification – Plot 05/09** With reference to your answer to ExQ1. 8.0.11 - Justification – Plot 05/09 [REP2-052]. If you have secured an option agreement with the landowner, please can you explain why you are seeking CA particularly given your admission that CA powers will not be needed of this plot?	The Applicant's response at 8.0.11 was not an "admission" that CA powers will not be needed. The Applicant states that it may be unlikely that powers of compulsory acquisition will be required. This is due to the presence of an option agreement. However, it continues to be appropriate to seek compulsory acquisition powers in relation to the freehold interest as whilst the Applicant has an option with the landlord it is not in possession nor in ownership of a legal title. Therefore, the Applicant must protect its position in relation to any future obstacle to performance of that contract, however, unlikely. This approach has been discussed and agreed with the landlord. It should be noted that plot 05/09 is subject to a number of encumbrances. Please see the Book of Reference which references, amongst other interests, the agricultural tenancy of the Bartles. Whilst the Applicant has sought an option agreement with the freeholder, it is not guaranteed that the freeholder will be able to provide the undertaker of the order with title free of encumbrances and therefore compulsory acquisition powers are necessary to protect the authorised development from this potential barrier and permit it to clear the title from such encumbrances.
Q8.0.4	The applicant	**Clarification – Order limits** With reference to your answer to ExQ1. 1.0.10 - Clarification – Order limits [REP2-052]. It appears that you require temporary possession of plots 02/23 and 06/23; is the landowner aware of this possibility so they have had the opportunity to participate in the examination?	The Applicant is not seeking temporary possession rights over these plots. The Order does not grant powers of temporary possession rights over these plots. Where the Applicant requires use of this land, it will be doing so by private treaty between the undertaker of the Order and the owner of the land in question.

9.	**The draft Development Consent Order (DCO)**		
9.1	**Articles**		
Q9.1.1	The applicant	**Article 7 – Defence to proceedings in respect of statutory nuisance** Explain why paragraph (1) has included paragraphs (d), (fb) and (ga) in addition to (g) from section 79(1) the Environmental Protection Act 1990, which the ExA notes were not included in the 'The Gate Burton Energy Park Order 2024', 'The Cottam Solar Project Order 2024' or 'The Mallard Pass Solar Farm Order 2024' which the Explanatory Memorandum (EM) [REP2-009] has referred to as precedence for its inclusion? In your response, explain clearly what the inclusion of each of these paragraphs would result in the undertaker not being liable for and why they are required.	The Applicant considers that it would be inappropriate to draw direct comparisons with other schemes in relation to particular paragraphs included in the defence to proceedings in respect of statutory nuisance, as this will be highly project specific and dependent on the assessment of likelihood of statutory nuisance in each of those cases. The Applicant has included these paragraphs based on its Statement of Statutory Nuisance [APP-178]. This statement explains each of these paragraphs, but in short: Section 79(1)(d) of the EPA states that the following constitutes a statutory nuisance: "any dust, steam, smell or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance" The Statement of Statutory Nuisance concludes that it is not predicted that the Proposed Development will produce any such nuisance, but given the inability to ensure that no possible such effects could arise the Order provides a defence for that nuisance. Section 79(1)(fb) of the EPA provides that the following constitutes a statutory nuisance, "artificial light emitted from premises so as to be prejudicial to health or a nuisance" The Statement of Statutory Nuisance concludes that a nuisance arising by section 79(1)(fb) is not expected to arise. However, given the potential for effects to arise, the Order provides a defence to that nuisance. The following constitute a statutory nuisance in respect of the EPA: • Section 79(1)(g) - "noise emitted from premises so as to be prejudicial to health or a nuisance"; and • Section 79(1)(ga) - "noise that is prejudicial to health or a nuisance and is emitted from or caused by a vehicle, machinery or equipment in a street". The Statement of Statutory Nuisance concludes that a nuisance arising by section 79(1)(g) or (ga) is not expected. However, as explained above, given the possible potential for effects to arise, the Order provides a defence to that nuisance.
Q9.1.2	The applicant	**Article 16 – Protective works to buildings** The EM [REP2-009] (paragraphs 6.72 and 6.73) contains very limited justification for this article. Noting the content of NSIP Advice Note 15: drafting development consent orders on the information EMs should contain, please provide further justification of the need for this article to allow the ExA, and ultimately the Secretary of State, to be clear why the article is necessary for the proposed development.	The Applicant considers that the wording provided in its EM **[REP2-009]** is consistent with previous applications and made Orders. However, it has updated its EM to provide greater explanation as to the operation of this article.
Q9.1.3	The applicant	**Article 19 – Compulsory acquisition of land** The Secretary of State has added a clause to similar articles contained in the made 'The Helios Renewable Energy Project Order 2025' (article 20) and 'The Fenwick Solar Farm Order 2026' (article 21) stipulating that compulsory acquisition does not apply in relation to any mine or	The Applicant is unclear on why the Secretary of State amended the DCOs included in the recommended orders in the stated cases. The Secretary of State's Helios decision letter did not provide a rationale. In the Fenwick decision letter, the rationale appeared to be that "provide that compulsory acquisition rights do not extend to rights in mines and minerals as these rights are not required for the authorised development". The Applicant would strongly resist any suggestion that a likewise amendment be made in this case.

		minerals rights. Explain whether a similar clause is required to the proposed development and if not, explain why not.	The Applicant cannot speak to these previously applications with any degree of certainty, but the Secretary of State decision letter for the Fenwick Solar Farm Order 2026 does contain a potential misunderstanding of the position in relation to mines and minerals. What is important to note, that the Applicant is not seeking "mines and minerals rights". The Applicant is seeking the full freehold title of land, free from encumbrances. Sometimes, these encumbrances might be in the form of mines and minerals rights reserved for particular bodies, often the Church Commissioners. The Applicant's ability to acquire a clean freehold title enables it to remove these mines and mineral rights from the title. This is important as regardless of the duration of the authorised development the working of mines and minerals beneath the authorised development provides a risk to operation which the Applicant considers unnecessary. The Applicant has incorporated the mineral code, as per article 31. The Mineral Code has been a core function of compulsory acquisition since its incorporation with the Acquisition of Land Act 1981. Acquisition of Land Act 1981, Schedule 2, paragraph 2 specifically notes that an acquiring authority, in this case the undertaker, is not entitled to mines under the land comprised in the compulsory purchase order unless they have been expressly purchased and all mines under the land shall be deemed to be excepted out of the conveyance of that land unless expressed named and conveyed. This does not apply to minerals necessarily extracted or used in the construction of an undertaking. What this means is that unless the mines or minerals interest is specifically noted in the Book of Reference, the undertaker will have no recourse to acquire that interest. By, paragraph 3 of the Minerals Code, if the owner of any mines and minerals desires to work them, he must give notice of his intention to do so 30 days before commencement of working. Should the acquiring authority then consider that the working is likely to damage the undertaker, it may bar any such work and pay compensation for the loss of value in the interest. Therefore, there are two principal routes in dealing with mines and minerals. Firstly, one can acquire (where expressly named) as part of the compulsory acquisition of land and pay compensation for that value at that date. Otherwise, one can delay acquisition of interests until such a time when the owner of the right comes forward and wishes to work that interest at which point compensation can be paid at that later point to prevent such works carrying out. It should be noted also that the second option provides a failsafe should the mines and minerals interest not be located on plans and deeds and not be included in the specific compulsory acquisition. It protects the acquiring authority in that instance from previously unknown interest. The wording suggested by the Secretary of State in the aforementioned DCOs cuts across this well-established regime, of allowing compulsory acquisition of interests upfront, subject to compensation whilst also providing for a failsafe in respect of unknown interests. It is appreciated that in the case of the Fenwick Scheme the Secretary of State retained the incorporation of the mineral code, unlike in Helios, which provides some protection but it still introduced what the Applicant would consider an unnecessary restriction on the ability to clean title early, and compensate mines and minerals holders at that early stage. In summary, the Applicant considers the position adopted in the dDCO entirely appropriate and reasonable. The ability to clean title is considered a justifiable position regardless of whether the Scheme is a temporary development or not as the working of mines and minerals during the operation of the scheme would have the same propensity to cause damage as it would against a permanent installation. The holder of any mines and minerals will be adequately compensated for any loss of interest meaning that their position should be unchanged in any event and therefore the removal isn't providing a material benefit, only a restriction against the undertaker's ability to protect the authorised development.

9.2	Schedule 2 – Requirements		
Q9.2.1	The applicant, Nottinghamshire County Council (NCC), Bassetlaw District Council (BDC) and Sturton le Steeple Parish Council	**Community Liaison Group** The ExA notes comments by Sturton le Steeple Parish Council [REP4-003] and NCC's response to action point 15 from ISH 3 [REP4-001] expressing support for establishing a community liaison committee, where NCC would support any requirement being added to the dDCO requiring the owner of the consent to initiate or actively participate in a local community liaison group. The ExA is aware that requirements relating to community liaison groups have been included on other made DCO's, such as but not limited to 'The Tillbridge Solar Order 2025' (requirement 4) and 'The West Burton Solar Project Order 2025' (requirement 4). The ExA requests the applicant liaise with the local authorities and the Parish Council to agree whether the imposition of a similar requirement would be appropriate for the proposed development and if so, provide appropriate wording for the dDCO. If not, parties are to explain why such a provision would not be appropriate or necessary.	The Applicant would point to Schedule 2, paragraph 7(2) which ensures that the CEMP must provide details of community liaison and that CEMP must be approved by the local planning authority prior to commencement. The Applicant considers that this commitment at paragraph 7(2) adequately ensures that processes for community liaison will be picked up, discussed and settled between the undertaker and the local planning authority as part of the CEMP and that a separate requirement is not necessary. It should be noted, in the case of Tillbridge Solar Order 2025 that its requirement 12 is not as prescriptive regarding the points which the CEMP must include. The approach of the Applicant in this respect, to secure liaison through the CEMP aligns with that of other solar projects such as: Heckington Fen Solar Park Order 2025, Stonestreet Green Solar Order 2025, Mallard Pass Solar Farm Order 2024, Sunnica Energy Farm Order 2024, Byers Gill Solar Order 2025, Oaklands Farm Solar Park Order 2025.
Q9.2.2	The applicant	**Requirement 3 – Detailed design approval** Sub-paragraph (2) requires submitted details to accord with the 'design parameters' although the definition in article 2 only refers to the 'environmental statement' which is considered too broad in scope. To improve precision, should the definition be more tightly defined, such as including reference to ES Appendix 4.5 - Outline Design Principles or any other documents that specifically set out design principles? If not explain why not.	The Applicant accepts that the current drafting could be considered broad. It was drafted in such a way to capture all relevant considerations of the Environmental Statement. However, the Applicant has made the amendment suggested by the ExA as the Outline Design Principles document is drafted in such a way as to present the "reasonable worst case" design option for the scheme.
Q9.2.3	The applicant, NCC, BDC and other interested parties	**Requirement 9 – Operational environmental management plan (OEMP)** Further to previous questions raised on the subject of maintenance, should provision be made in sub-paragraph (2) for the OEMP to set out details of a maintenance schedule to provide greater transparency on the type of maintenance works that the local authority and local	The Applicant is of the strong opinion that expanding the requirement to include a "maintenance schedule" would not be necessary or proportionate. It would result in a very long, overly complex requirement. The OEMP itself is the document that manages maintenance and operation to ensure that environmental impacts are addressed and mitigated. However, the OEMP itself wouldn't prescribe a set maintenance schedule. The requirement itself is not concerned with defining maintenance or setting a prescribed extent of such activities, only to ensure that maintenance activities are appropriately managed in accordance with the assumptions of the environmental assessment.

		residents can expect, and confirmation that the environmental effects that are likely to arise as a result would not be materially worse than those report in the ES? If not, explain why not and if so, provide details of any additional wording.	Regarding the extent of maintenance activities, the Applicant is firmly of the view that the dDCO is absolutely categoric that no maintenance works can occur where they are likely to give rise to any materially new or materially different effects that have not been assessed in the environmental statement and therefore no changes are required to re-state that fact. The Order is a statutory instrument. A creature of legislation and it is drafted as a complex legal vehicle. It is not always easy for laypersons to interpret its provisions. That is why an explanatory memorandum is required. The Applicant would strongly resist a suggestion that the dDCO start being amended to introduce repetitions in the name of clarity for local residents. The Applicant considers that the Order makes clear the legal extents of the operation of the authorised development.
Q9.2.4	The applicant	**Requirement 13 – Public rights of way diversions** Subparagraph (3) includes the tailpiece "unless otherwise agreed with the local planning authority in consultation with the highway authority". Section 5.3.17 of NSIP Advice Note 15: drafting development consent orders states tailpieces such as these should not be included in requirements. Please remove reference to the tailpiece or explain why it has been added and why it is justified given the content of Advice Note 15. In addition, there also appears to be no maintenance clause in sub-paragraph (3), such as requiring the implemented measures to be maintained throughout the operation of the relevant part of the authorised development. Please clarify or explain why one is not required.	Advice Note 15 does not state that tailpieces should not be included in requirements. Advice Note 15 states the following regarding tailpieces: *17.3 Applicants should be aware that details fixed by the terms of the DCO can only be changed if authorised, and following adherence with the prescribed approach explained in section 153 of and Schedule 6 to the PA2008. Furthermore, it is not acceptable to circumvent the prescribed process in Schedule 6 by seeking to provide another route to approving such changes or variations, by a person other than the Secretary of State who made the DCO, for example by applying the provisions of section 73 and/ or section 96A of the TCPA1990.* *17.4 Therefore, adding a tailpiece (a tailpiece is a mechanism inserted into a condition (or by analogy a Requirement) providing for its own variation) such as the one below would not be acceptable because it might allow the discharging authority to approve a change to the scope of the Authorised Development applied for and examined, thus circumventing the statutory process:* *The authorised development must be carried out in accordance with the principles set out in application document [x] [within the Order limits] unless otherwise approved in writing* *17.5 On the other hand, a Requirement might make the development consent conditional on the discharging authority approving detailed aspects of the development in advance (for example, the relevant planning authority approving details of a landscaping scheme).* ***Where the discharging authority is given power to approve such details it will be acceptable to allow that body to approve a change to details that they had already approved****. However, this process should not allow the discharging authority to approve details which are outside the parameters authorised within any granted DCO. [Our emphasis]* Please note that the underlined text explicitly permits tailpieces where they are providing the discharging authority the power to approve a change in details which it has previously approved. Requirement 13(3) states that the public rights of way management plan must be implemented as approved unless otherwise agreed with the local planning authority in consultation with the highway authority, being the same parties who approved the original plan under requirement 13(1). The restriction on tailpieces refers to the ability to agree variations of an order with a party who did not approve the original parameters.
Q9.2.5	The applicant	**Procedure for Discharge** NCC's response to action point 12 from ISH 3 [REP4-001] has referred to provisions contained within schedule 2 of the made 'The Tillbridge Solar Order 2025' which splits the discharging responsibilities of specific requirements between different planning authorities. The applicant is requested to comment on whether such a provision should be included as part of the	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. 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 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.

		dDCO for the proposed development, and to explain its reasons if not.	The Applicant acknowledges that pursuant to Section 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. 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. This would ensure consistency across the requirements to ensure a single discharging authority. 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. Just because NCC are lead local flood authority or highway authority does not mean they are the county planning authority for those matters meaning that they have no lesser or greater claim to discharge these matters than the local planning authority. However, the Applicant can see the merit in shifting all discharge functions in Schedule 2 to NCC, if that would be supported by the County Council.
9.3	**Schedules 3, 4, 5 and 6**		
Q9.3.1	The applicant	**Plan reference** The description of works column in each schedule refers to the 'streets, access and rights of way plan'. However, document [AS-005] is entitled the 'Access and Rights of Way Plan', which is also referred to in schedule 12. Please amend to ensure all references to the title of the document are consistent.	The Order refers to this plan throughout as the "streets, access and rights of way plan" as it is used across schedules relating to streets, access and rights of way. The definition for this plan clearly states that the streets, access and rights of way plan means the plans described as the access and rights of way plans as certified by Schedule 12. The reason for this difference is just due to the specific name adopted for the plan in the application documents. It is therefore considered that the DCO is internally consistent and that references do not need updated.
Q9.3.2	The applicant	**Accuracies** The applicant is requested to undertake a thorough review of all refences to point numbers and locations within these schedules to ensure they are all accurately described, with any corrections included in the dDCO to be submitted at deadline 5.	The Applicant carried out an in-depth review for Deadline 2, and updated the DCO accordingly. The Applicant is content that the Schedules accurately describe the details set out in the respective plans.
9.4	**Schedule 10 – Protective provisions**		
Q9.4.1	The applicant Anglian Water Services Cadent Gas Limited EDF Energy (Thermal Generation) Limited Environment Agency (EA) Exolum Pipeline System Limited Holcim UK Limited National Grid Electricity	**Wording for Protective Provisions** The ExA noted the applicant's update during compulsory acquisition hearing 1 [EV6-001] on the current position of agreeing protective provisions. The ExA requests that any party affected by protective provisions provides any preferred wording you are seeking to the dDCO at deadline 5 where disagreement remains with the applicant. The applicant is also requested to update schedule 10 of the dDCO at deadline 5 providing full wording of all outstanding provisions with those parties requiring protective provisions (even if not agreed).	The Applicant has submitted a Section 127 Report **[D5 REF]** which sets out the status of and outstanding points of disagreement within each of the protective provisions. The Environment Agency are not referenced within the submitted Section 127 Report as no such protective provisions are required nor have they been sought by the Environment Agency. The Applicant is committed to continued engagement with those parties where substantive agreement has not yet been reached and will continue to seek agreement prior to the close of examination.

	Distribution (East Midlands) plc NGET Network Rail Infrastructure Limited Trent Valley Internal Drainage Board West Burton Solar Project Limited Any other party affected by protective provisions and not listed	Where areas of disagreement remain, the applicant is requested to lead on providing a table setting out the specific wording for each party that is subject to disagreement, the wording that the objecting party is seeking and each party's position for the wording requested.	
Q9.4.2	The applicant and Leep Utilities	**Request for update** Can the applicant and Leep Utilities [RR-016] update the ExA as to whether the proposed development would affect or interfere with any assets belonging to LEEP Utilities and if so, whether any protective provisions are currently being negotiated? If so, advise where any outstanding areas of disagreement are.	The Applicant is not aware of any assets belonging to LEEP Utilities that would be impacted by the proposed development and confirms that no interests of LEEP Utilities have been identified in the Book of Reference [D5 REF]. Bespoke protective provisions for the benefit of LEEP Utilities are therefore not required nor have they been sought by LEEP Utilities. Should any apparatus be identified at a later stage, which is considered highlight unlikely, the general provisions in Schedule 10 Part 1 and 2 would provide protection from LEEP Utilities.
9.5	**Schedule 12 – Documents to be certified**		
Q9.5.1	The applicant	**Incomplete details** Columns (2) and (3) in the table remains incomplete in the latest version of the dDCO [REP3-005]. Please complete this section in full for the next version of the dDCO to be submitted at deadline 5 with any changes to document references incorporated into the final dDCO to be submitted at deadline 6. The ExA would also query whether ES Appendix 4.5 - Outline Design Principles [REP2-031] should be included as a certified document. If not, explain why not.	The Applicant has updated Schedule 12. The Outline Design Principles was already a certified document as it sits within the environmental statement, which is itself certified but given it now has explicit reference in requirement 3 the Applicant has added a definition to article 2 which confirms it is a certified document.
10.	**Flood risk, drainage and the water environment**		
Q10.0.1	Applicant	**Unexpected contamination** Please respond to the EA's comments in [REP4-004] section entitled '*RR-025/20 (Unexpected contamination) Progress ongoing*.'	The Applicant has revised the Outline Construction Environmental Management Plan (oCEMP), Outline Operational Environmental Management Plan (oOEMP) and outline Decommissioning Plan (oDP) to address the minor amendments requested from the Environment Agency regarding unexpected contamination. Following a Meeting on the 12th March 2026 with the EA, the Applicant understands that this item is now agreed. All three revised (Revision 4) documents have been submitted at Deadline 5.
Q10.0.2	Applicant	**BESS – water used in firefighting**	

		Please respond to the EA's comments in [REP4-004] section entitled '*RR-025/22 (Water used in firefighting) Progress on-going.'*	The Applicant has revised the Outline Fire Risk Management Plan; Outline Fire Risk Management Layout Plan and Surface Water Drainage Strategy to address the comments from the Environment Agency regarding BESS water used in firefighting and BESS drainage. All three revised documents have been submitted at Deadline 5. The Applicant understands that these documents have now been agreed with the EA and has submitted a signed SoCG at Deadline 5 to that effect.
Q10.0.3	Applicant	**BESS drainage** Please respond to the EA's comments in [REP4-004] section entitled 'RR-025/23 (BESS drainage) Progress on-going.'	
Q10.0.4	Applicant	**Content of Outline CEMP** Please respond to the EA's comments in [REP4-004] section entitled *'RR-025/31 Content of oCEMP'.*	The Applicant has revised the Outline Construction Environmental Management Plan (oCEMP) to address the minor amendments requested from the Environment Agency regarding content of outline CEMP (temporary construction drainage strategy).. The revised (Revision 4) outline CEMP has been submitted at Deadline 5. The Applicant understands that this document has now been agreed with the EA and has submitted a signed SoCG at Deadline 5 to that effect.
Q10.0.5	Applicant & EA	**Flood risk assessment – decommissioning phase** The EA stated that the FRA should be updated to include an assessment of decommissioning phase flood risk impacts and include an assessment of floodplain volume loss due to infrastructure within the 100 year plus 39% climate change extent [REP3-048; EA 9.1]. Applicant and EA to update on this matter.	The Flood Risk Assessment was amended and submitted at Deadline 4 at Section 8.1.4 to provide the assessment of decommissioning phase impacts requested by the EA. The Applicant understands that the EA have agreed to these amendments and the Applicant has submitted a signed SoCG to that effect.
Q10.0.7	Applicant	**Flood risk assessments – possible pump failure** Please detail how the flood risk assessment has included for possible pump failure and the impact on local watercourses.	The Flood Risk Assessment has been updated at Section 5.2.22 and submitted at Deadline 5 to include an assessment of the impacts of a pump failure on local watercourses. The risk associated with a pump failure has been assessed as less severe than a breach flood event from the River Trent. The measures proposed to mitigate against a breach flood event will therefore also be effective against a pump failure event. During either flood event (both considered a 'residual' risk rather than a 'design' event), the Proposed Development will be shut down remotely and therefore rendered safe for the duration of the flood event.
11. Historic environment			
Q11.0.1	The applicant	**Policy compliance** NPS EN-1 paragraph 5.9.16 states "A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted, and whether or not consent should be given." Can you confirm how the proposed development has met this paragraph?	As outlined in the Archaeology Strategy Note **[REP2-053],** the Applicant has adopted an approach to carry out pre-determination trenching in the areas where the Proposed Development would have had the greatest impact in order to obtain detailed information as to whether that part of the Proposed Development would generate a significant effect. The Applicant has then proposed to carry out post-determination trial trenching in areas where the impact of the Proposed Development would be less (i.e. the panel areas, as secured by Appendix 9.5 Outline Written Scheme of Investigation for Post Consent Archaeological Works **[APP-126],** which is in turn secured through requirement 17 of the dDCO.) The approach of the Applicant aligns with this paragraph of the NPS EN-1 as it seeks to preserve in-situ archaeological deposits. Trial Trenching is an intrusive and destructive process by its very nature. The Applicant notes that the County Archaeologist set out in oral evidence at ISH2 that this removal of deposits would be recorded archaeologically, and thus its impacts mitigated. However, as is demonstrated in paragraph 5.9.16 of the NPS EN-1, this is not as valuable as retaining the heritage asset. Therefore, the Applicant considers that its phased approach to trial trenching is a proportionate approach and in line with paragraph 5.9.16. The Applicant's approach, in terms of carrying out trial trenching post-consent when the Scheme has been consented means that the disturbance would only occur if the Scheme actually takes place. The alternative, if the application were refused, and if the more

			extensive trenching were to be undertaken pre-consent, is that archaeological deposits may be removed permanently without justification. The Applicant has removed the areas of greatest archaeological potential, as identified by the geophysical survey, from the Proposed Development to avoid any direct impacts to these remains, as outlined in the Archaeological Mitigation Statement **[APP-124].** The Outline Written Scheme of Investigation for Post Consent Archaeological Works **[APP-126]** makes allowances for the preservation in situ of any additional areas of significant archaeology, that may be identified through the post-determination trial trenching through no-dig methods of construction, or avoidance, thereby avoiding impacts to below ground archaeological remains in these areas. In conclusion, the Applicant has designed its scheme and mitigation measures in the knowledge that records do not replace heritage in-situ. It has removed areas at risk of being adversely impacted from the Proposed Development, and is implementing a strategy of trial trenching that seeks to minimise unnecessary damage.
Q11.0.2	The applicant	**Archaeological significance** Your response [REP2-050] to NCC's Local Impact Report [REP2-063a] paragraph 5.2.7 agrees that areas of high archaeological potential have been identified by the geophysical survey [APP-123] and that the "state of preservation, depth, date and significance has not been established". Noting the latter comment, please set out clearly how the Secretary of State can appropriately seek to identify and assess the particular significance of the areas of high archaeological potential that have been identified by the geophysical survey (particularly in and areas A to D) that may be affected by the proposed development, including its setting, as required in NPS EN-1 paragraph 5.9.22.	For the areas of high archaeological potential as identified by the geophysical survey, informed, professional judgement has been used to identify these areas based on the strength and/or complexity of responses within the survey data. For example, the area to the south of the Scheduled Monument clearly shows a probable linear settlement, focused on either side of a routeway. In form, these are characteristic of a Roman linear settlement and follow the route of a known Roman road, as identified in Appendix 9.2 Magnitude Surveys Geophysical Survey Report **[APP-123].** Given the location of this, in location south-west of the Scheduled Roman town of Segelocum, along with a review of existing archaeological reports, this has led to a firm and informed conclusion that this is anthropogenic in nature and further, of a type which is highly probable to be related to the nearby Scheduled Monument. Other areas identified areas are summarised in Section 2 of Appendix 9.3 Archaeological Mitigation Statement **[APP-124].** As noted in the Archaeological Mitigation Statement, these areas have been identified as having the greatest potential for significant archaeological remains, based on the complexity and plan of anomalies, and strength of responses. In all cases these concentrations of anomalies include complexes of enclosures, with internal features, likely indicative of settlement and/or occupation activity. Taking into account the results of the geophysical survey, the desk-based assessment, and LiDAR assessment, it is considered that there is sufficient information to be able to identify the areas of high archaeological potential. Paragraph 5.9.22 NPS EN-1 states that the Secretary of State should seek to identify and assess the particular significance of any heritage asset **that may be affected by the proposed development.** The importance of establishing significance is borne out by the remaining paragraphs of section 5.9, where the Secretary of State must then go on to consider the impact of a proposed development on the significance of an asset, and then undertaker to weigh that impact against the public benefits of a Scheme. In relation to buried archaeology, the importance of establishing significance is relevant only to those elements of a scheme which will impact the buried archaeology, and cannot be moved or built in such a way that avoids harm. . The Applicant has designed the Proposed Development to avoid the areas of high archaeological potential (Areas A to D), and the associated Archaeological Mitigation Statement **[APP-124],** as supported by the design controls in requirement 3 and the archaeological requirement 17 of the dDCO, as in accordance with NPS EN-1, paragraph 5.9.21. This ensures that areas of identified archaeology will not be impacted during construction. This means there does not need to be an assessment of significance to inform the impact. Appropriate procedures for the identification (further evaluative works), and treatment (further mitigation) of other heritage assets of archaeological interest in the areas outside of these exclusion areas is provided the Outline Written Scheme of Investigation for Post Consent Archaeological Works **[APP-126].** NPS EN-3, paragraphs 2.10.137 states that the "ability of the applicants to microsite specific elements of the proposed development during the construction phase should be an important consideration by the Secretary

			of State when assessing the risk of damage to archaeology". This then also feeds into the requirement the Secretary of State to understand the significance of assets, as by solar development being able to flexibly adjust to avoid impacts, there is less requirement to understand significance.
Q11.0.3	The applicant	**Areas not surveyed** ES Appendix 9.2: Magnitude Surveys Geophysical Survey Interim Report [APP-123] contains an area of approximately 66 hectares that has yet to be surveyed. The ExA notes that this area has been identified by NCC, in appendix 4 of its response to ExQ1 Q11.0.11 [REP2-063], as an area with high archaeological potential. Provide further information, supported by surveys, detailing the archaeological significance of these areas, or signpost to where this is contained in the application documents.	An updated geophysical survey report (document reference EN010163/EX/6.3.9 Appendix 9.2 Rev 2) has been submitted at Deadline 5, and the results of the additional survey work were shared with the Historic England and the archaeological advisors to Nottinghamshire County Council at a meeting dated 9th February 2026. The further survey work has covered the vast majority of the Proposed Development, with only a single, narrow field within an area of proposed development (Field Number 70 on **[APP-010]),** and an area of proposed landscape and ecology mitigation (across Field Numbers 108 and 99) in the western extent of the Order Limits still inaccessible. Within the additional survey area only a single small area of additional archaeology was identified, comprising a small group of curvilinear anomalies within the west of the Order Limits. These are not considered to be complex or strong enough to warrant exclusion of development, and it is considered that the anomalies could be investigated during further evaluative works, which would inform any subsequent mitigation. This is the same approach as proposed with other areas of similar anomalies, which is accommodated within the Outline Written Scheme of Investigation for Post Consent Archaeological Works **[APP-126].** The Applicant is not aware of any comments from the County Archaeologist disagreeing with this approach. One area of potential high archaeological potential (as identified by NCC in appendix 4 of its response to ExQ1 Q11.0.11 **[REP2-063])** lies within the northern extent of the land surveyed. The area was identified by NCC due to the presence of an HER record in this area (ref. MNT6849). These are undated cropmarks described as follows: "Cropmarks in oilseed rape. Field boundaries and ridge and furrow, running E-W and N-S. Possibly a short stretch of trackway." The geophysical survey has not identified any anomalies of archaeological interest in this area, with only agricultural features recorded such as former field boundaries, and land drains. Given the nature of the HER record and survey results this is not considered to be an area of high archaeological potential. The Applicant is not aware of any comments from the County Archaeologist disagreeing with these conclusions With regard to the area which was not surveyed, being the single field (Field 70) . The fields to the immediate north and south (Field 56 and 57 to the north, and Area 86 to the south) were both surveyed and no anomalies of probable or possible archaeological origin were identified in either field, with only former field boundaries, remnant buried furrows, and land drains recorded. Anomalies of probable archaeological origin were however recorded in a field c.180m to the south-east (Area 82). Based on the results of the survey in adjacent fields, it is considered unlikely that further survey work in this area would identify anomalies indicative of an area of high archaeological potential, however this cannot be entirely discounted. It is considered that further investigation of this area could be accommodated within the further evaluative works proposed within Outline Written Scheme of Investigation for Post Consent Archaeological Works **[APP-126]**.
Q11.0.4	The applicant and NCC	**Post consent archaeological works** ES Appendix 9.5 [APP-126] paragraph 5.2 refers to the scope of proposed post-consent trial trenching, outside the areas already trenched during pre-determination, and states as part of these works it is proposed that trial trenches will be sited on areas within the east of the site which have potential for geoarchaeological deposits, including possible palaeochannel(s). Noting appendix 4 of NCC's response to ExQ1 11.0.11 [REP2-063] highlights wide areas	No, it is not considered that this paragraph or the document in general requires updating because the text at paragraph 5.2 of ES Appendix 9.5 [APP-126] is not exclusionary. Its purpose is to draw attention to the geoarchaeological potential of parts of the site, and to ensure that post-consent works will include, and allow for investigation of possible geoarchaeological deposits. The first sentence provides the context for post-consent trenching in general, i.e. that the scope of this will be agreed with the Archaeological Advisor(s).

		of archaeological significance in the western part of the site, does this paragraph or the document in general require updating to refer to wider areas? If not, explain why not.	
Q11.0.5	NCC	**Outline Written Scheme of Investigation** The ExA notes your comments in the SoCG with the applicant [REP4-032] (issue NCC 22) regarding stated shortcomings of the Outline Written Scheme of Investigation. Can NCC expand further upon what it considers are highly questionable statements and a reductive interpretation of policy? Can NCC advise further what it is seeking to improve the content of the document?	[n/a]
Q11.0.6	The applicant	**North Leverton Windmill (Grade II* listed)** Your response [REP2-050] to the comments made in paragraph 5.1.8 of NCC's Local Impact Report [REP2-063a] acknowledges that the use of the windmill forms part of its significance although considers that the proposed development "will not have any impact upon this" and the visitor experience to the windmill (the historic fabric, the moving sails, the ability to purchase flour milled at the windmill and its immediate agricultural surroundings) will not change to such an extent that would cause of harm to its significance. Can the applicant provide a more detailed analysis clarifying its reasoning in relation to this assessment? In particular, to what extent has the loss of arable land to the proposed development and any grain from those fields used to mill flour at the windmill been considered as part of the findings in paragraph 6.50 of ES Appendix 9.1 [APP-122] (which states the immediately surrounding agricultural land makes a 'minor' contribution to the asset's significance) and paragraph 9.7.18 of ES chapter 9 [APP-067] (which states the immediately surrounding agricultural land and key elements of the asset's setting will be unaffected by the proposed development)?	The Proposed Development will not impact on the historic fabric of the Windmill, it will not have an impact on the moving sails of the Windmill, and will not prevent the Windmill from sourcing grain to mill into flour. The Applicant is unable to confirm the origin of where the Windmill currently sources its grain. However, as far as the Applicant is aware there is no direct contract of exclusivity between the Windmill and the agricultural enterprises currently in operation on the Order Limits. This means that any agricultural enterprise within the Order limits would be free to sell the grain produced on their land to any buyer. This points to an inherent unreliability, volatility and transience of any relationship between the mill and the surrounding farms. The Windmill may source grain from the land surrounding its situation but the owners of the surrounding land do not need to sell to the Windmill. The relationship between the two is incidentally related, commercially driven and functionally independent. This provides justification for the position of the Applicant that removal of a potential source of grain does not, in and of itself, cause a harm to the significance of the asset. The Windmill continues to sit in an agricultural setting and the land immediately surrounding the windmill will be unaffected by the Proposed Development. The historical functional association between the mill and the surrounding landscape, and the sourcing of grain from this land is acknowledged and has been considered as part of the assessment (e.g. at paragraph 6.50 of ES Appendix 9.1 **[APP-122]**). The identified 'minor contribution' made by the surrounding agricultural land is in relation to the fact that it provides the immediate, historic rural context to a mill that has a relationship with farms, in terms of utilisation of the crop, across the surrounding parishes, but is not considered to comprise one of the key elements of the asset's setting, which comprise the associated mill cottage, surrounding yard, and adjacent Mill Lane which provided access to the mill for deliveries of crops, and collection of flour.
Q11.0.8	The applicant and NCC	**Use of ballasted foundations for preservation *in situ***	The use of above ground construction methods within areas of archaeological potential is a common approach to allow for in situ preservation. Rather than driven into the ground, panels are mounted on concrete plinths/ballast/metal plates to avoid and/or

		Paragraph 4.4.13 of ES chapter 4 [APP-062], ES Appendix 4.5 [APP-093] and section 9 of ES Appendix 9.5 [APP-126] refer to the use of ballast slab foundations where archaeology constraints have been identified and areas of 'no dig' construction. Provide further details explaining how the use of such foundations would preserve any archaeological sensitive areas or assets of archaeological significance in perpetuity, how these would be secured as part of the detailed design process and the extent to which such foundations could affect assets that are located at shallow depths. NCC is also asked to submit comments on the suitability of using ballast slab foundations in areas of high archaeological significance and the potential effects to assets.	minimise belowground impacts. Cables can also be suspended behind panels and run above ground. Typically, there will be constraints in terms of the types of vehicles and timings (e.g. avoiding periods of wet weather) during which activities can be undertaken within these areas to avoid impacts related to vehicle movements, with areas also being fenced off during construction, to control movement. It is not anticipated that this type of construction would result in any impacts to buried remains, as weight is distributed across the plate/plinth area and the panels sit above the ground, which is currently under arable use, and subject to greater belowground impacts. Should any areas be identified during further evaluative works, which are considered particularly sensitive to development, e.g. significant archaeological remains are identified at very shallow depths, then other forms of mitigation are available, as appropriate, up to and including avoidance of installation any development in that area, as outlined in **[APP-126].** This approach is secured through requirement 17 of the dDCO.
No Q11.0.9	The applicant	**Christian Heritage and the Pilgrim Trial** Comments were submitted by Sturton le Steeple Parish Council at deadline 4 [REP4-037] providing further submissions to explain 'How the Christian Heritage contributes to the significance of the heritage assets in the area in our opinion'. Please respond to the points made.	The Applicant has responded to REP4-037 under separate cover, as set out in its cover letter to Deadline 5.
Q11.0.10	The applicant	**Archaeology and Solar Farm: Good Practice Guide – Consultation Draft, August 2025** Your evidence provided through written submissions and hearings has referred to this document. For completeness, please submit a full copy to the examination so it can be made available on the examination library.	A copy of the referenced Consultation Draft (dated to August 2025) (document reference EN010163/EX/8.53) is to be submitted. It is noted that that is not the final draft, which is due to be submitted shortly, however may not be available during examination.
12. Land use and soils			
Q12.0.1	The applicant	**Top soil removal and reinstatement** Please provide evidence that the top soil to be removed to enable the proposed development, can be taken away and stored for 40 years and then reinstated and be suitable for farming.	Removing topsoil, placing it in managed, long-term storage, and replacing it at the restoration stage is established practice and can be achieved successfully. As set out in the ES Chapter 15: Land Use and Agriculture [APP-072], the areas within the Proposed Development where topsoil needs to be removed are limited. Short-term removal is required for the construction compounds and for trenching to install underground cabling, as described in ES paragraphs 15.7.6, 15.7.8 and 15.7.18.

			The ExA question relates to soil that will be stored for 40 years. This is the topsoil from the access tracks (15.7.9), substations and BESS Compound (15.7.10), and small areas under the power conversion unit hardstandings and for basins. These areas are quantified in Table 15.8 and by ALC grade in Table 15.9, and amount to the use of 12.1 ha of BMV. The principles of moving and storing soil are set out in the outline Soil Management Plan **[REP3-027],** which provides greater detail on how the soil will be stored. The tracks and power conversion units across the Proposed Development account for an estimated 8.4 ha of BMV, as set out in Table 15.9. This is therefore almost 70% of the area where long-term storage is required. The soil will be stored adjacent to the tracks or the power conversion units, as described in the ES at 15.7.9 and in the oSMP at section 8. Tracks are linear features and the best way to restore land to its original condition is to put back the same soil as was removed. With a linear feature such as a track, the easiest way to store soil so that it can go back in the same place is to store it next to the track. Hence the soil is scraped to one or both sides when the track is being constructed and is scraped back when the track surface has been removed. The topsoil will be scraped off mechanically and placed to the side of the tracks. As the tracks are 3 – 4m wide and the topsoil strip is 25 – 30cm deep, only 1 cubic metre per metre run needs to be stored. This can easily be accommodated without affecting land management. If a swale is required, the volume of soil could be slightly greater, but the soil can be stored adjacent to the swale. The power conversion units are small and the soil can be stored adjacent. The soil storage for the BESS and substations will require a different solution, but following similar principles. Topsoil in the area of the BESS is all similar, as described in the ES Chapter 15 at 15.7.10 **[APP-072B].** Further detail is provided in the oSMP **[REP3-027]** at section 11. The topsoil will be stored in long-term storage bunds following the principles set out in Defra's Code of Practice for the Sustainable Use of Soils on Construction Sites (2009), Appendix SMP2 to the oSMP. The bunds will be adjacent to the area from where the topsoil has been moved, and will be should be grassed-over and the vegetation cut at least once annually. This ensures that the bund does not erode, woody vegetation does not establish, and the soils in the bund remain in a dry and aerobic state. Detailed guidance on the stripping and storing of soil is set out in the Good Practice Guide for Handling Soils in Mineral Workings (Institute of Quarrying, 2022) which has replaced MAFF's Good Practice Guide for Handling Soils (2000). These are referred to in the oSMP **[REP3-027]** at section 11. Achieving long-term storage of topsoil that does not affect the viability of the soil is common practice on mineral workings and now on solar farms, and is achievable without adverse effects on the soil, subject to following good practice. The principles of returning the soil on decommissioning are set out in section 14 of the oSMP **[REP3-027].** The subsoil should be loosened (i.e. decompacted) and the topsoil then returned when it is in a dry and non-plastic state, and the area can then be cultivated with normal agricultural machinery, and then planted or sown with a vegetative cover. For avoidance of doubt the soil management plan secured through requirement 11 of the dDCO.
Q12.0.2	The applicant	**Waste** With reference to the SoCG between the applicant and NCC [REP4-032] (issue NCC 12), please provide details of expected waste arisings, and of their proposed treatment, from operation and decommissioning within the OEMP and decommissioning plan as well as a commitment to provide an annual	A revised outline Construction Environmental Management Plan (oCEMP), outline Operational Environmental Management Plan (oOEMP) and outline Decommissioning Plan (oDP) have been submitted at Deadline 5. A Site Waste and Materials Management Plan (SWMMP) would be developed prior to the start of commencement and included as an appendix to the CEMP. The SWMMP would include roles and responsibilities, estimates of waste arisings (types, quantities, and timing), procedures for identification of suitable management facilities and application of the waste hierarchy, and monitoring and reporting requirements. The SWMMP would be updated during the operational and decommissioning lifetime of the project and as required to reflect, for example, the availability of new recycling facilities (as they are developed) and any requirements deriving from new

		planning maintenance schedule via the Outline CEMP at deadline 5.	regulations or policies. It would be an appendix to the OEMP and DP (as stated in table 3.14 page 40 of the outline OEMP and table 3.1 page 12 of the outline oDP).
Q12.0.3	The applicant	**Effects on farm businesses** With reference to your answer to ExQ1 12.0.5 [REP2-052], provide the updated ES chapter regarding the effects on farm businesses.	The Applicant has provided an updated Chapter 15 of its Environmental Statement in clean and tracked copy setting out the effects on farm businesses.
Q12.0.4	The applicant	**Food security** Your answer to ExQ1 12.0.4 [REP2-052] is unclear. Please submit a further response addressing the original two specific questions: 1. *Submit evidence of the National Food Strategy Review and signpost to where the referred to findings are in this document.* 2. *Explain how you are working closely with farmers that would be affected by the proposed development and the measures you are adopting to achieve this.*	**1. National Food Strategy Review** The initial question in ExQ1 12.0.4 states: "*paragraph 3.7.3 on page 286 states "the independent National Food Strategy Review shows that solar farms do not in any way present a risk to the UK's food security. Indeed the reverse is true: the solar industry is working closely with Britain's farmers to reduce their energy costs and improve the sustainability of their operations*" The Applicant noted that this reference was incorrect. The National Food Strategy Review did not address this point. Comments to this effect are contained in the Solar Energy UK document "Solar farms and food security: the facts" (September 2022), but not in the National Food Strategy. Therefore, for clarity, the National Food Security Review does not address the question of solar farms and risk to food security. As set out in **[REP2-052]** at 12.0.4, the United Kingdom Food Security Report 2024 (Defra, 11 December 2024) (rather than the National Food Strategy Review) at section 2.2.4 identifies that food production levels could be moderately increased alongside the land use change required to meet our Net Zero and Environment Act targets and commitments, which is the point incorrectly ascribed to the National Food Strategy Review. It is noted that the Solar Roadmap (DESNZ, June 2025) Appendix 2, on page 6, addresses the popular misconception that "*solar is a threat to food security*". The response is that "*the biggest threat to food security is crop failure due to climate change and solar farms are helping to tackle this directly*". Footnote 14 to this response references the United Kingdom Food Security Report 2021, Theme 2 "UK Food Supplies". The "key messages" of that document are as follows (in full): • "*The UK has diverse and longstanding trade links that meet consumer demand for a range of products at all times of the year. Trade is dominated by countries in the EU and it is too early to say what effect leaving the EU might have on that trade.* • *Domestic production is also stable, with variations in yield and consumer demand balanced by imports and exports. Both agricultural production and manufacturing have become increasingly efficient and are geared towards meeting consumer demand, although food waste is still high.* • *The biggest medium to long term risk to the UK's domestic production comes from climate change and other environmental pressures like soil degradation, water quality and biodiversity. Wheat yields dropped by 40% in 2020 due to heavy rainfall and droughts at bad times in the growing season. Although they have bounced back in 2021, this is an indicator of the effect that increasingly unreliable weather patterns may have on future production*". In summary, therefore, paragraph 3.7.3 of the Applicant's responses to relevant representations [**REP1-008**] was incorrect in that it referenced the wrong document. As noted in response to ExQ1 12.0.4 in the Applicant's response to ExA First Written Questions [**REP2-052**], the effects are in fact described in the Food Security Reports (both 2024 and 2021). **2. Working With Farmers**

			The response at 3.7.3 of [**REP1-008**] stated in generic terms that "the solar industry is working closely with Britain's farmers to reduce energy costs and improve the sustainability of their operations". The ExA question, as noted in ExQ1 12.0.4 was to "explain how you are working closely with farmers that would be affected by the proposed development and the measures you are adopting to achieve this". It is believed, therefore, that the ExA question is not about the generic comment in 3.7.3 of [**REP1-008**], but a specific question relating to this proposal, and specifically as to how the Applicant is working with farmers affected by this proposal to reduce energy costs and improve the sustainability of their operations. In the Applicant's response to ExQ1 12.0.4 [**REP2-052**] it was stated that "the Applicant is not presenting evidence of directly working with farmers on this proposed development specifically to reduce energy costs or improve sustainability". The ExA has requested a further response to address the original question, but as the Applicant is not working closely with farmers on this particular development in respect specifically of reducing energy costs and increasing the sustainability of their operations, the Applicant is not able to provide any greater explanation and so cannot address the question in greater detail.
13.	**Landscape and visual**		
Q13.0.1	The applicant	**Cumulative effects** Following the submission of the Cumulative SZTV Plan [REP2-054], the updated viewpoints (ES Appendix 6.1 [REP3-017] and [REP3-018]) and photomontages (ES Appendix 6.2 [REP3-019] and [REP3-020]) and the additional winter photomontages [REP3-050], the ExA requests that both ES Appendix 6.3 [APP-099] and ES Appendix 6.6 [APP-102] are updated to provide written commentary on the combined and sequential cumulative effects. Where there is the potential for cumulative effects, the name of the scheme should be referenced along with the likely extent of effects.	Updated versions of ES Appendix 6.3 **[APP-099]** and ES Appendix 6.6 **[APP-102]** have been provided, as requested.
Q13.0.2	The applicant	**Residential visual amenity assessment** The response to relevant representations [REP1-008] (page 308) states the "perimeter fence of the Steeple DCO and the western elevation of Keepers Cottage is 76.3 metres at the nearest point". Yet ES appendix 6.4 [APP-100] notes that the nearest approximate distance to the nearest built element of proposed development and direction from this property is 105 metres. Please clarify the exact distance and provide any necessary updates to the assessment in ES appendix 6.4 to address any discrepancies.	The Applicant has reviewed the text on page 308 of the response to relevant representations **[REP1-008],** in particular the bullet point referenced by the ExA *"Perimeter fence of the Steeple DCO and the western elevation of Keepers Cottage is **76.3 metres** at the nearest point"* and compared this to the distance measurement for the property of approximately 105m set out the Residential Visual Amenity Assessment (RVAA) **[APP-100].** The difference between the two measurements is due to slightly different points being measured within both the property and the Proposed Development. The measurement of 76.3m was between an outbuilding to the property, rather than the residential dwelling itself and fenceline of the Proposed Development. The measurement in the RVAA was between the centre of the residential dwelling and the nearest proposed solar panels. This is illustrated on the annotated plan below.

			
Q13.0.3	NCC	**Landscape mitigation** Your position in the SoCG [REP4-032] (issue NCC 25) considers that any DCO should secure robust landscape mitigation, long-term management (for a minimum of 15 years), and post-establishment monitoring. Confirm the additions or alterations you are seeking to the dDCO, or application documentation, to address your concerns and whether this has been incorporated in other solar schemes.	A meeting was held on 5th March between the Applicant and the Council's Landscape Consultant to discuss the matters raised in the 'key areas of disagreement' set out by NCC. Following this meeting the Applicant agreed to update the Outline Landscape and Ecological Management Plan **[APP-116]** to extend the requirement for replacement planting, so that this also covered the period from 5 years up to 15 years for any planting but only in the event of loss due to a major weather event or other force majeure scenario. The general replacement period of 5 years was agreed to remain unchanged. The Applicant continues to maintain that appropriate mitigation has been provided, but this further commitment will give even greater certainty that the benefits of the landscape mitigation will be delivered, even if an extreme weather event were to happen that would result in loss to some of the new planting.
Q13.0.4	The applicant and Doncaster Sheffield Airport	**Glint and glare – Effects on aviation** In the SoCG with BDC [REP3-047] (issue BDC 20), the BDC comment that Doncaster Sheffield Airport should be included as one of the stakeholders to be consulted as they are currently going through the regulatory process to reinstate controlled airspace to enable the reopening of Doncaster Sheffield Airport. Can the applicant and the airport confirm the extent of any consultation that has taken place and whether the airport has raised any concerns or comments in respect of the proposal?	In September 2025, the City of Doncaster Council submitted an Airspace Change Proposal ('ACP') to the Civil Aviation Authority ('CAA') that proposes to reintroduce the controlled airspace previously established by Doncaster Sheffield Airport prior to its commercial failure. South Yorkshire Chambers of Commerce (Barnsley & Rotherham, Doncaster, and Sheffield) confirmed on the 12th January 2026 that they are working with partners including City of Doncaster Council with the projected aiming of reopening Doncaster Sheffield Airport for freight in 2027 and passengers in 2028[1]. This aligns with the CAA's timeframe for determining the Doncaster and Sheffield Airport ACP which is provisionally indicated for a decision and implementation in February 2027[2]. [1] South Yorkshire Chambers Respond to Doncaster Sheffield Airport Airspace Consultation. Available at: https://www.doncaster-chamber.co.uk/blog/south-yorkshire-chambers-respond-to-doncaster-sheffield-airport-airspace-consultation/ .[Accessed on 10.03.2026]. [2]Doncaster Sheffield Airport CAA Assessment Meeting 3 September 2025. Available at: https://airspacechange.caa.co.uk/documents/download/7984 . [Accessed on 10.03.2026]. Doncaster Sheffield Airport has been included in the Glint and Glare assessment provided within ES Chapter 16 – Glint and Glare **[APP-073]** and ES Appendix 16.1 Solar PV Glint and Glare Study **[APP-133]**. Both documents refer to and have followed guidance issued by the Civil Aviation Authority ('CAA'). The outcome of the Glint and Glare assessment and study is that the Scheme will have no significant impact, and therefore no mitigation is required.

			The distance between the airport and proposed development is ~16.9km. The aerodrome is aligned north-west. The proposed development will be implementing south-facing panels. This further decreases the likelihood of glint and glare impacts upon the aerodrome. Therefore, the Applicant's position is that a significant impact would not be reasonably foreseeable and therefore Doncaster Sheffield Airport was not modelled in detail for the purpose of the Glint and Glare Assessment or consulted with due to the potential impact being considered and deemed not significant to require consultation. Doncaster Sheffield Airport ceased operation in November 2022. In March 2024 City of Doncaster Council secured a 125 year lease on Doncaster Sheffield Airport and initiated a strategic programme to reopen the airport. Paragraph 2.2.8 page 24 of the Consultation Report **[APP-047]** confirms the Applicant has been liaising with City of Doncaster Council on the Steeple DCO since November 2024 (after the Council had leased Doncaster Sheffield Airport) because City of Doncaster Council are a neighbouring local authority. A completed signed Statement of Common Ground (SoCG) with City of Doncaster Council **[REP2-056]** was submitted at Deadline 2. The Applicant consulted the CAA on the Steeple DCO as part of Section 42 statutory consultation prior to submission(May 2025) but did not receive a response.
14.	**Noise and vibration**		
Q14.0.1		No further questions at this stage.	[n/a]
15.	**Population**		
Q15.0.1	The applicant	**Residential development in Sturton le Steeple** Regarding the new housing development approved in Sturton le Steeple, (referred to in ISH 2, item 5), has this been assessed in respect of noise, vibration, fire risk etc from the proposed development? If not please provide it.	As the new housing development came forward after the DCO submission was made, this was not assessed in the cumulative assessment included in the submission. The Application for 9 residential dwellings on North Street (25/01026/FUL)) was validated on 18th Sep 2025 and determined on 5th February 2026. Five properties front onto North Street. The remaining four are laid out as a courtyard behind them. Condition 15 requires a landscaping scheme around the properties. This is yet to be discharged so the final details of the landscaping scheme is not known, but would be likely to filter views outwards, especially from ground level. As a worst-case, there would however be some potential for views out from the new properties towards the Proposed Development, primarily from the upper storeys of the four properties in the courtyard, with less visibility from the five properties which front on to North Street. The existing views from the new properties would be in the direction of the former West Burton Power Station Site. The nearest point to the solar element of the Proposed Development from the new properties would be approximately 345m, the nearest point to the BESS would be 350m and the nearest point to the Substation would be 365m. In terms of an assessment of visual effects. The properties would be 'high' sensitivity receptors, in common with all residential properties considered in the LVIA. The magnitude of change would be no greater than Low/Medium, resulting in a moderate effect, which would not be significant.[DE1] [BS2] In terms of potential cumulative effects, the nine new properties are located on the site of existing built development, which currently comprises of large agricultural sheds. There would therefore be no change to landscape character or visual amenity in terms of additional cumulative effects. With regards noise, the approved housing development is located near to H29 (as shown on Figures 11.1 & 11.2 of the EIA) and is located slightly closer to the BESS aspect of the Proposed Development. Predicted operational noise levels in both isolative and cumulative terms are approximately 1 dB higher than that provided for H29 which makes no substantive difference to the overall operational assessment and can be considered not significant as a result. The remaining effects in terms of noise and vibration from construction, operation, decommissioning and traffic resulting from the introduction of the Proposed Development are unchanged as a result of the presence of the consented housing. With regards fire safety, based on plans submitted as part of application 25/01026/FUL, dwellings in the approved residential development will all be sited over 350m from the proposed BESS facility. A distance of 350m already forms the basis of our preliminary

			fire risk assessment for nearest residential dwelling. As stated in the Outline Fire Risk Management Plan, this distance far exceeds the 30m minimum distance to residential building recommended in current NFCC guidance. A modification to the sensitive receptors plan could be made to account for the development after it has been built to ensure records are kept up to date. However, it is not expected that this would change the conclusion of the sensitive receptors risk assessment. Our preliminary assessment for toxic plume dispersal is undertaken on the basis of a 350m distance to the nearest residential dwelling. It is anticipated that the risk to premises at this separation distance from the facility can be reduced to As Low As Reasonably Practicable (ALARP) during detailed design. The Applicant is not aware of any other issues requiring assessment.
16.	**Socio-economic effects**		
Q16.0.1		No further questions at this stage.	[n/a]
17.	**Transportation and access**		
Q17.0.1	The applicant	Construction traffic management Please explain how the construction traffic management plan will include a formal role for community representatives to input into the plan?	Please see the Applicant's response to Q4.0.1. The Applicant has secured community liaison within the dDCO as 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. The CTMP doesn't need to separately secure this community liaison. Through these community liaison groups, concerns can be fed back to the Applicant who can take those matters under consideration. It may be that concerns are fed back that require the plan to be amended to appropriately address concerns. However, the Applicant considers it more likely that the feedback will be able to be appropriately actioned without a need for a formal amendment to the CTMP. The Applicant's comment at Q4.0.1 as well as its response to NCC at REP4-001/19 in its responses to Deadline 4 submissions which is that the purpose of management plans is to manage the mitigation required as a result of the assumptions of the environmental statement. This is a technical process which does not require public input. This doesn't mean that the Applicant is not willing to engage with the public regarding the effectiveness of its management plans, but it would strongly resist any suggestion that public consultation is required for the discharge of the requirement.
18.	**Other planning topics**		
18.1	**Air quality**		
Q18.1.1	The applicant	**Particulate Matter (PM2.5)** Reference is made within ES chapter 14 [REP2-020] (paragraph 14.2.9) to the Department for Environment, Food and Rural Affairs publishing interim guidance in October 2024, which applies to future developments and those that were in pre-application at the publication of the guidance and how they can demonstrate appropriate consideration of targets for	The Site Selection for the Proposed Development occurred prior to the publication of the mentioned guidance. The Applicant would note that the NPS does not mandate site selection on this basis. However, the Applicant considers that it has appropriately mitigated against the risk of dispersal of PM2.5 through the commitments set out in the oCEMP. During the construction phase there is the potential for the emission of $PM_{2.5}$ which may impact nearby receptors. A Construction Dust Risk Assessment [APP-130] has been carried out to determine the level of dust risk and appropriate mitigation measures have been included within the outline Construction Environmental Management Plan **[Table 3.10 within REP3-011]** to ensure there are no significant offsite effects. In addition, table 3.1 on pages 7-8 of the outline Construction Environmental Management Plan **[REP3-011]**

		PM2.5 set out in the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023. The guidance emphasises the importance of implementing appropriate mitigation measures during the design stage to minimise PM2.5 emissions and exposure than assessing the likelihood of exceeding the limit value. Please clarify: 1. How has exposure to PM2.5 been considered when selecting the development site. 2. What actions or mitigations have been considered to reduce PM2.5 exposure for development users and nearby receptors (such as residents and visitors) and to reduce emissions of PM2.5, including cumulatively, and its precursors. 3. If no mitigation measures have been implemented, why was this not proposed.	also includes measures to reduce emissions from vehicles during the construction phase. The potential for cumulative impacts during construction has been discussed in Section 14.10 within Chapter 14: Air Quality **[REP2-020]**. There are not expected to be any occupants on site for which the annual mean $PM_{2.5}$ Air Quality Objective is relevant and therefore there is no risk of exposure during operation. In addition, given the nature of the site, there are no activities likely to generate particulate matter and, therefore, there will be no significant impacts to air quality during operation. As such both aspects were scoped out of further assessment **[APP-078].**
Q18.1.2	The applicant	**BESS safety – toxic plume dispersal** During ISH 2 on environmental matters, the applicant referenced the prevailing wind direction regarding dispersal of toxic fumes in the event of fire. What are the plans for toxic fume dispersal when the wind is not blowing from the prevailing direction and how are these plans secured?	In the event of a thermal run-away incident, hydrogen fluoride (HF) gas will be produced. If released, this gas will form a cloud surrounding the battery storage enclosure that presents a toxicity hazard. As part of risk assessing our proposed BESS site location, we have undertaken a preliminary HF toxic cloud assessment based on a generic, but representative technical report (Hazard Assessment of Battery Energy Storage Systems, Atkins, Ian Lanes, Issue 01, March 2021) issued by The Health and Safety Executive for Northern Ireland. The assessment explores the reduction of HF concentration based on a set of conservative assumptions regarding the release of HF, distance from the release, and wind conditions resulting in the worst case spread of HF. A project-specific assessment will be made as part of the hazard identification and mitigation analysis during detailed design. However, based on the results of the preliminary assessment, the distance of over 350m from a battery container to the nearest premises means that it is anticipated that the risk at any nearby premise can be reduced to As Low As Reasonably Practicable (ALARP) during detailed design. The assessment is a risk based assessment using the worst case assumptions derived from the preliminary design of the proposed development. It does not generate any assumptions or expectations in and of itself regarding design, but rather provides evidence as to the appropriateness of the current design assumptions presented in the environmental statement, and outline design principles, as secured by requirement 3 of the dDCO. It does not therefore require “securing” in the dDCO.