
Steeple Renewables Project

Statement of Common Ground between Applicant and Nottinghamshire Fire and Rescue

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1 Introduction

1.1 Purpose of this document

1.1.1 This Statement of Common Ground ('SoCG') has been prepared to support the Examination of the Development Consent Order ('DCO') application for the Steeple Renewables Project (the 'Proposed Development').

1.1.2 The SoCG has been prepared jointly by Steeple Solar Farm Limited (the 'Applicant') and Nottinghamshire Fire and Rescue ('NFR') to clarify the current position of the relative parties on specific matters that are, or have been, under discussion. It seeks to confirm to the Examining Authority ('ExA') where there are points of agreement between the parties and where agreement has not been reached to date. It therefore aids the ExA in identifying any specific issues that may need to be addressed during the Examination and provides a structure to any further discussions for the parties engaged in the SoCG.

1.1.3 This document has been prepared in response to a specific request from the ExA as per the Rule 6 Letter Issued 10th October 2025.

1.2 Terminology

1.2.1 Section 2 of this document sets out the relevant matters raised through discussion between the parties. It provides a summary of the position of each party and identifies the status of discussion on each matter:

- "Agreed" means that a matter has been resolved between the parties and is not anticipated to be subject to further discussion:
- "Under discussion" means that a matter remains in active dialogue between the parties and a final position has not been reached:
- "Not Agreed" means that the parties have established a final position that they cannot resolve the matter and will remain a point of difference.

1.2.2 In accordance with the request from the ExA in the Rule 6 Letter, a **Low**, **Medium** and **High** 'traffic light' (also known as a RAG system) is applied to each matter to indicate the likelihood of their resolution during the Examination period.

1.3 Status of this document

1.3.1 This document is at completed stage. Matters engage are summarised in Table 1.

Table 1 – Matters engaged in this SoCG

Draft Development Consent Order	Engagement with NFRS	NFCC Guidance for BESS design	Access to BESS	Access via Common Lane

2 Current Position

- 2.1.1 Table 2 on the next page provides a summary of the current position of the Applicant and NFR in relation to specific matters that have been under discussion to date.
- 2.1.2 Where a matter is not represented in the table, it should be assumed that it is either: (i) agreed between the parties and has never required detailed discussion; or (ii) not relevant to the discussion between the parties.
- 2.1.3 Appendix A of this document (to follow) provides a record of engagement undertaken between the parties in relation to the Proposed Development. This is limited to engagement which is materially relevant to the contents of this SoCG and does not seek to include every correspondence between the parties (e.g. that which was primarily administrative).

Table 2 – Current position of matters relevant to the parties’ discussions

Row ID	Topic	Applicants Position	NFR’s Position	Status
NFR 1	Draft Development Consent Order (DCO)	<p>There is no freehold acquisition sought in the dDCO [REP3-005]. The remaining powers sought are in relation to the acquisition of new rights and/or temporary possession which is proportionate and necessary to facilitate the Proposed Development.</p> <p>The dDCO [REP3-005] is based on legal precedent and includes the appropriate structure, scope, provisions, requirements and protective provisions.</p> <p>Requirement 10 of the dDCO [REP3-005] secures a Fire Risk Management Plan (FRMP) that builds on the details provided in the Outline Fire Risk Management Plan (oFRMP) [REP2-029]. Requirement 10, sub paragraph 3 provides that the local planning authority responsible for approving the Fire Risk Management Plan must not do so until it has consulted with the Nottinghamshire Fire and Rescue Service. Therefore, Nottinghamshire Fire and Rescue Service will be consulted further post-consent in order to secure an approved Fire Risk Management Plan.</p>	<p>It is difficult for us to say we’re happy with the outline FRMP when details are yet to be finalised. My suggestion would be that you either submit your final FRMP at this stage, commit to adhering to NFCC guidance in full or commit to final sign off by the planning authority at a later stage. We would like consulting on your final FRMP.</p> <p>The Fire Authority are happy to consult again following publication of the detailed Fire Risk Management Plan.</p>	Agreed

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		A revised dDCO will be provided at Deadline 5 that confirms Nottinghamshire Fire and Rescue service will be a named consultee on the detailed Fire Risk Management Plan post-consent as requested regardless if this differs or not from the oFRMP.		
NFR 2	Engagement with Nottinghamshire FRS	The Applicant understands that the Nottinghamshire Fire and Rescue Service is seeking protective provisions on the same terms as those secured in other local DCOs in Nottinghamshire and Lincolnshire, namely the payment by the Applicant to NFRS of an index linked fee of £16,665 in the first year of operation followed by £1,530 each subsequent year of the projects total life of 40 years. Without accounting for indexation, this gives a nominal value being sought of £77,865. Example projects where the Applicant is aware of these types of protective provisions include the West Burton Solar Project Order 2025 or the Tillbridge Solar Order 2025 which secured this wording for Lincolnshire Fire and Rescue. As far as the Applicant is aware, no Order has yet confirmed such payment to Nottinghamshire, although the Applicant acknowledges that the One Earth Solar Farm scheme does purport to provide this.	In recognition of the risks associated with emerging BESS technology, the National Fire Chiefs Council and updated planning policy guidance recommend early consultation with local Fire and Rescue Services. A programme of ongoing monitoring and risk assessment for which a financial contribution via a Protective Provision in the DCO is requested. Whilst consulting on plans, site familiarisation visits etc places a significant burden on ourselves, we won't be challenging your decision not to award the protective provision.	Agreed

		<p>The above payment is described as a compensatory payment for the costs associated by a site familiarisation exercise, and then an annual review/site visit.</p> <p>The Applicant has reviewed the examples set by other local solar farms and considered that it would not be appropriate for such a payment to be made to NFRS. Firstly, the Applicant is not bound by the examples of other schemes and it should be noted that this payment is not a nationally adopted position but rather appears to be a practice that has come out of the cluster of solar farms in Lincolnshire. It should also be noted that the Applicant is not seeking these services from NFRS.</p> <p>The Applicant considers that what is effectively being sort is a quasi-planning obligation. The role of protective provisions is to ensure that the carrying on of an undertaking by a statutory undertaker is not undermined by the Scheme particularly in relation to compulsory acquisition. The Applicant has no such impact on NFRS.</p> <p>The protective provisions sought do not seek to mitigate an impact that the Scheme is having, but rather seek to secure a contribution to the ongoing duties of the fire service. In this light, if they were to be required they would be more</p>	<p>The Fire Authority are no longer seeking the protective provision.</p>	
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		<p>appropriately held in a section 106 agreement – being the statutory vehicle for the payment of sums required to make development acceptable in planning terms. To be valid, section 106 obligations must be necessary to make the development acceptable in planning terms; be directly related to the development; and be fairly and reasonable related in scale and kind to the development. The Applicant doesn't consider that the proposed payment would meet this criteria.</p> <p>One of the key reasons why it would not meet this criteria is due to the existing funding arrangements of the Fire and Rescue Service. Caselaw has proven that the cross-subsidy of public-funded bodies for the provision of services which would otherwise be funded through a central mechanism is not appropriate in a planning (s106) agreement.</p> <p>The Applicant considers its position is consistent with the vast majority of DCOs.</p> <p>The Applicant does not consider that protective provisions for Nottinghamshire Fire and Rescue Service for the purpose of securing monitoring and familiarisation fees are appropriate or consistent with the purpose of Section 127 of the Planning</p>		
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		Act 2008 or necessary in accordance with Section 106 Town and Country Planning Act 1990.		
NFR 3	National Fire Chief Council (NFCC) Guidance for design of Battery Energy Storage System (BESS) sites	<p>The Applicant has submitted an Outline Fire Risk Management Plan (oFRMP) [REP2-029] and an Outline Fire Risk Management Layout Plan [REP2-006].</p> <p>Outline Fire Risk Management Plan (oFRMP) [REP2-029] emphasises fire safety in its 150 MW Battery Energy Storage System (BESS). Key measures include strategic equipment spaces, dedicated fire protection systems, and emergency access routes. The plan will evolve into a detailed Fire Risk Management Plan post-battery selection, incorporating a fire risk appraisal and emergency response strategies in collaboration with Nottinghamshire Fire and Rescue Service secured by Requirement 10 of the dDCO [REP3-005].</p> <p>Appendix B of the Outline Fire Risk Management Plan (oFRMP) [REP2-029] provides an NFCC recommendation cross-referenced to the BESS layout and design. This includes access, roads, turning and passing facilities, distances from BESS to occupied buildings and site boundaries, access between BESS units, areas within 10m of BESS units cleared of vegetation, water supply, signage, emergency plan, environmental impacts, system design/</p>	<p>The Fire Authority has requested that the developer follows the NFCC Grid Scale Battery Energy Storage System Guidance and other relevant standards (e.g., NFPA). If any deviations are proposed, these must be supported with expert evidence or technical data.</p> <p>Appendix B of the Outline FRMP considers some recommendations from NFCC guidance but not all. NFCC guidance has recently been updated and can be accessed via the below link:</p> <p>Battery Energy Storage Systems - NFCC</p> <p>Significant deviations from NFCC guidance include:</p> <ol style="list-style-type: none"> 1. Distance between BESS units. NFCC guidance suggests a minimum separation of 0.914M (supported by testing). 	Agreed

	<p>construction/ testing/ and decommissioning, deflagration preventing and venting.</p> <p>The Applicant has addressed the above considerations within Appendix B of the Outline Fire Risk Management Plan (oFRMP) [REP2-029] in adherence to the NFCC Guidance (as updated).</p> <p>A revised oFRMP will be provided at Deadline 5. It includes an update in section 3.3.6 to confirm refill of water tank prior to recommissioning of the site; updates to align with 2025 NFCC guidance in sections 3.2, 3.3.1, 3.3.4; new sections 3.4 (Sensitive Receptor Assessment); and an accompanying Appendix D (sensitive receptor assessment).</p> <p>Distance between BESS units - The current layout is based on a minimum distance of 3m between battery enclosures side-to-side and 0.3m end-to-end. As per latest NFPA 855 guidance, a separation of less than 0.914m can be justified based on large-scale fire testing. Although a particular battery enclosure product hasn't been specified at this stage, there are several products currently on the market that have passed a large-scale fire test with BSEs being separated by 0.3m or less. Whichever product is specified during detailed design, it</p>	<p>2. Water Supply. An on site water supply must be accessible for use. I'd suggest you firm up your commitment in this respect.</p> <p>The Fire Authority has advised the end to end separation distance be increased to more easily allow, in the unlikely event of a fire, the application of cooling water to neighbouring BESS units. The Fire Authority suggest this distance be set at a minimum of 0.914M. The Fire Authority acknowledge that unit design may render the application of cooling water to neighbouring BESS units unnecessary and accepts the applicant's proposals are in accordance with NFCC guidance.</p> <p>Both proposals for water supply are acceptable to the Fire Authority. The Fire Authority request that tank fixtures and fittings are compatible with our fleet of fire appliances.</p>	
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		<p>will have passed a large-scale fire test to inform and confirm the final spacing between BSEs.</p> <p>Water Supply - Current NFCC guidance states a water supply of 1,500 litres per minute for a least two hours should be accessible on site, equating to a minimum volume of 180m³.</p> <p>Two solutions identified - A piped hydrant constructed on site that is served by water main from North Street or Gainsborough Road. Alternatively two spatial provisions for water tanks have been included in the preliminary BESS layout, both measuring 17m x 13m that can store 180m³. Tanks would be filled with clean water from water tankers before site operation. In the event of a fire, the tanks would be refilled from water tankers once safe to do so following the event. Site operation will not recommence until the tanks have been refilled with 180m³ of water.</p>		
NFR4	Access	<p>The Applicant has provided suitable accesses to the BESS site with adherence to the NFCC Guidance (as updated) as recorded in Appendix B of the Outline Fire Risk Management Plan (oFRMP) [REP2-029], with reference to the Outline Fire Risk Management Layout Plan [REP2-006] and rights over the applicable public highway.</p>	<p>The Fire Authority requests that the developer follows NFCC guidance.</p> <p>Assuming the site to be secured, we'll require access through locked gates in the event of an emergency.</p> <p>The Fire Authority can't commit to holding key codes but is happy to discuss site access at a later stage. It is likely we</p>	Agreed

		Access for Fire and Rescue Service to Bess - Last paragraph of the oFRMP confirms the local fire rescue services will be given the ability to gain access to the BESS compound even if the site is unmanned. Details of the access procedure will be developed as part of the detailed fire risk management plan, and will be included in the emergency response plan, but the procedure is anticipated to comprise the inputting of a key code.	will ask the applicant to install Secure Information Boxes adjacent to site entrances, openable by Gerda or FFE1 keys – both of which are carried on our fire appliances, allowing access to plans/ codes/ keys etc.	
NFR5	Access	<p>Access to the BESS Site via Common Lane provides suitable access for the purposes of NFR. Common Lane is a public highway, is not gated and is not subject to any weight restriction.</p> <p>Nottingham County Council (NCC) in their Post-hearing submissions including written summaries of oral cases made at the hearings held the w/c 9 February 2026 [REP4-001], confirmed that Common Lane is accessible as an all-purpose adopted highway and suitable for heavy vehicle access.</p>	<p>The Fire Authority requests access be in accordance with table 15.2 from Approved Document B (Volume 2) – link below:</p> <p>Approved Document B volume 2 Buildings other than Dwellings 2019 edition incorporating 2020 2022 and 2025 amendments collated with 2026 and 2029 amendments</p> <p>The Fire Authority is happy to accept NCC’s judgement in regard to weight carrying capacity.</p>	Agreed

A1 Record of Engagement

Date	Method of Engagement	Purpose/Description
20/01/2025 to 03/03/2025	Statutory Consultation	Statutory consultation about the DCO.
20.01.2025	Email	S42 Notification
11.11.2025	Email	SoCG issued to Nottinghamshire Fire and Rescue via attachment to email
03.12.2025	Email	Chasing comments on SoCG
12.12.2025	Email from Nottinghamshire Fire and Rescue Service	Apologised for late reply and that a response would be provided as soon as possible
15.12.2025	Email	To clarify when Nottinghamshire Fire and Rescue Service would be responding by
19.12.2025	Email from Nottinghamshire Fire and Rescue Service	Email seeking dates for an MS Team meeting early in 2026
06.01.2026	Email	Providing dates for an MS Team meeting
08.01.2026	Email from Nottinghamshire Fire and Rescue Service	Confirm dates for an MS Team meeting
15.01.2026	MS Team Meeting	Discussed the Principal Matters in the SoCG
15.01.2026	Email	Provided links to fire related documentation on the Steeple File on the Planning Inspectorates website – Outline Fire Risk Management Plan, Outline Fire Risk Management Layout Plan, draft Development Consent Order
21.02.2026	Email from Nottinghamshire Fire and Rescue Service	Comments provided on the SoCG via attachment to email
30.01.2026	Email	Clarify the applicants position regarding Protective Provisions and financial contribution requested to the ongoing duties of the fire service
30.01.2026	Email from Nottinghamshire Fire and Rescue Service	Notification that the email regarding the applicants position regarding Protective Provisions and financial contribution requested to the ongoing duties of the fire service had been received and was under consideration internally
17.02.2026	Email	Chasing updates on Applicants position Protective Provisions (PP)

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19.02.2026	Email	SoCG Rev 2 issued via attachment to email, requested MS Team meeting and provide links to the Planning Inspectorates website for the dDCO, oFRMP and OFRMP Layout Plan.
23.02.2026	Email from Nottinghamshire Fire and Rescue Service	Confirmed position on PP's would be chased internally as well as availability for an MS Team meeting
26.02.2026	Email from Nottinghamshire Fire and Rescue Service	Comments on SoCG Rev 2 provided via attachment to email. Availability for MS Team meeting also confirmed.
26.02.2026	Email	Thanked NFRS for comments on SoCG Rev 2 and confirmed MS Team meeting date and time would be discussed internally.
03.03.2026	Email	Confirmed availability for MS Team meeting on 05 March and meeting invites issued
05.03.2026	Email	Copies of revised oFRMP and Layout Plan issued to be discussed at the MS Team meeting later in the day.
05.03.2026	MS Team Meeting	Discussed the principal matters in the revised SoCG, revised details in the oFRMP and layout plan.
17.03.2026	Email	Further revised oFRMP with layout plan embedded issued to NFRS for consideration with comments requested by 20.03.2026
18.03.2026	Email	Rev 3 SoCG emailed via attachment to email.
20.03.2026	Email from Nottinghamshire Fire and Rescue Service	Comments on the SoCG provided via email
24.03.2026	Email from Nottinghamshire Fire and Rescue Service	Further comments on the SoCG provided via attachment to email
24.03.2026	Email	Rev 3 SoCG (clean) emailed via attachment to email for signing

A2 Signing Sheet

Duly signed and authorised on behalf of
Steeple Solar Farm Limited (the 'Applicant')

Name:	██████████
Job Title:	DCO Lead Developer
Date:	24.03.2026
Signature:	████████████████████

Duly signed and authorised on behalf of
Nottinghamshire Fire and Rescue

Name:	██████████
Job Title:	Watch Manager Fire Protection
Date:	24.03.26
Signature:	████████████████████