
Steeple Renewables Project

Statement of Common Ground between Applicant and Historic England

March 2026

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Prepared By	The Steeple Renewables Project Consultant Team	
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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 Historic England ('HE') 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 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 currently at draft stage. Matters engage are summarised in Table 1.

Table 1 – Matters engaged in this SoCG

Historic Environment - Setting	Historic Environment - Assessment of Designated Assets	Grade II* listed Church of St Peter and St Paul	Grade II* listed Church of St Peter and St Paul - approach to mitigation	Archaeology – approach to trial trenching on ‘fixed’ areas of large-scale development.	Archaeology – approach to trial trenching	Archaeology – approach to mitigation – areas of high potential	Archaeology – approach to mitigation – Rest of Site	Archaeological Mitigation Areas and impacts associated with ecology	Ecological mitigation impacts across wider Site
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Archaeology - alluvial/fluvial deposits and ridge and furrow	Draft Development Consent Order and Written Schemes of Investigation (WSIs)	Draft Development Consent Order and Archaeological Exclusion Zones
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2 Current Position

- 2.1.1 Table 2 on the next page provides a summary of the current position of the Applicant and HE 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 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

ID row	Topic	Applicants Position	HE’s Position	Status
HE 1	Historic Environment - Setting	Historic England Setting GPA 3 (2017 2 nd Ed) has been utilised as outlined in paragraph 6.2 of ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122] . The Applicant acknowledges that setting is not purely a visual concept, and this is outlined in methodology and approach to setting assessment.	Agreement with the principle of this statement	Agreed verbally
HE 2	Historic Environment – Assessment of Designated Assets	The Applicant has an undertaken a robust assessment with regard to indirect (operational) effects, and effects have been identified to the following designated heritage assets: <ul style="list-style-type: none"> • Segelocum Roman town Scheduled Monument – minor adverse, not significant; • Medieval settlement and open field system immediately south east of Low Farm Scheduled Monument – minor adverse, not significant; • Grade I Listed Church of St Martin – minor adverse, not significant; • Grade II* Listed Church of St Peter and St Paul – moderate adverse, not significant; 	HE to review and confirm whether agreed or not.	General agreement confirmed verbally on call

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		<ul style="list-style-type: none"> Grade II* North Leverton Windmill – minor adverse, not significant; and, Grade II Listed Manor Farmhouse – minor adverse, not significant. <p>Where harm has been identified this is less than substantial for all designated assets.</p>		
HE 3	Grade II* listed Church of St Peter and St Paul	<p>A detailed assessment of potential impacts to the significance of the asset, in line with Historic England Setting GPA 3 (2017 2nd Ed), is provided at paragraphs 6.41-6.46 of the ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]. The key and contributory elements of the asset’s setting are considered in ES Chapter 9: Cultural Heritage [APP-067] at paragraph 9.7.14.</p> <p>This asset would experience a level of adverse impact/less than substantial harm.</p>	Agreed.	Agreed verbally
HE 4	Grade II* listed Church of St Peter and St Paul – approach to mitigation	<p>There is embedded mitigation through design as part of the Scheme. As illustrated on Figure 6.9 Landscape and Ecological Mitigation Strategy [APP160], there will be a substantial offset from Sturton, no PRoW changed, and development offset from these. Hedgerow planting is also proposed around the areas of proposed solar development to help screen views of the development from the asset.</p>	HE to review alongside landscape masterplan and outlined views.	Not yet agreed
HE 5	Archaeology – approach to trial	<p>A programme of pre-determination trial trenching on ‘fixed’ areas of large-scale development was undertaken w/c 28th</p>	Agreed	Agreed verbally

	trenching on 'fixed' areas of large-scale development.	October. The scope of these works is outlined in ES Appendix 9.4 - Outline Written Scheme of Investigation for Pre-Determination Trial Trenching [APP-125]), which was agreed with the LPA's Archaeological Advisor in advance of the trial trenching.		
HE 6	Archaeology - approach to trial trenching	The scope of further trial trenching and/or mitigation, to be undertaken post-consent across the remainder of the Proposed Development, will be agreed in consultation with the LPA's Archaeological Advisor(s) (ES Appendix 9.5 - Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126]).	As discussion during the Issue Specific Hearing (ISH1) 12 th November 2025, we currently support the LPA's concerns regarding the level of pre-determination trenching. We would welcome further discussion and engagement, in collaboration with the LPA on this topic.	Under discussion
HE 7	Archaeology - approach to mitigation - areas of high potential	Certain areas of the Site, considered to have the highest potential for significant archaeological remains, as identified by the geophysical survey (ES Appendix 9.2 - Magnitude Surveys Geophysical Survey Report [APP-123]) have been avoided through the design of the Proposed Development, to preserve these remains <i>in situ</i> .	Agreed	Agreed verbally
HE 8	Archaeology - approach to mitigation - Rest of Site	Across the remainder of the Order Limits, the flexible nature of the Proposed Development, and its impacts facilitates a dynamic and flexible approach to mitigation that has been accommodated via ES Appendix 9.5 - Outline Written Scheme	HE to confirm whether they are happy with the approach to <i>in situ</i> preservation, as outlined during the meeting, and with regard to the dynamic/flexible approach to mitigation.	Not yet agreed

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		of Investigation for Post-Consent Archaeological Works [APP-126]. The oWSI provides a range of potential mitigation options up to and including exclusion from development, to follow on from evaluative works (as outlined at paragraph 5.7).		
HE 9	Archaeological Mitigation Areas and impacts associated with ecology	No development is proposed within these areas, and details regarding the proposed ecological mitigation have been included within the ES Appendix 9.3 Archaeological Mitigation Statement [APP-124] , at paragraph 3.9-3.14.	Agreed	Agreed verbally
HE 10	Ecological mitigation impacts across wider Site	It is understood that ecological mitigation across the wider site will typically not extend below plough soil but where there is potential for greater impacts an appropriate archaeological response can be undertaken as outlined in WSI for Post Consent Works, and detailed in the Archaeology Strategy Note.	Noted.	Agreed verbally
HE 11	Archaeology - alluvial/fluvial deposits and ridge and furrow	The Outline Written Scheme of Investigation for Post-Consent Archaeological Works (Appendix 9.5, [APP-126]) has been prepared, outlining the methodology for further evaluative works, and a range of mitigation options, depending on the results. This would allow areas where ridge and furrow and/or alluvial/fluvial deposits are encountered to be investigated and an appropriate archaeological response implemented. Anomalies indicative of archaeological remains have identified in conjunction with ridge and furrow and where river terrace/alluvial deposits are identified – see ES Appendix 9.2 –	Agreed.	Agreed verbally

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		Magnitude Surveys Geophysical Survey Report [APP123]. Anomalies co-located with recorded ridge and furrow are evident on figures 11, 14, 43, 55, and 58.		
HE 12	Draft Development Consent Order and Written Schemes of Investigation (WSIs)	Requirement 17 (archaeological written scheme of investigation (WSI)) of the draft DCO [APP-041] sets out that no phase within the authorised development, and no part of the site preparation works for that phase, may commence until an archaeological WSI for that phase has been submitted to and approved by the local planning authority in consultation with the county archaeologist. Requirement 17(3) states that any archaeological works must be carried out in accordance with the approved WSI (for each phase of development), as set out in the outline WSI for Post-Consent Archaeological Works (Appendix 9.5 [APP-126]) at paragraphs 5.4 and 5.8. The means by which evaluative works will inform further mitigation is outlined a paragraph 5.5-5.9 of the oWSI	HE to confirm that they are happy with the document hierarchy and feedback loop which is covered by the outline WSI and Requirement 17 – these ensure that further WSIs for each phase of development will be required, and that further mitigation will be informed by evaluative works	Not yet agreed
HE 13	Draft Development Consent Order and	The Archaeological Mitigation Statement (AMS) [APP-124] refers to the process of protection of archaeological exclusion zones. These exclusion zones do not need to be specifically referred to in requirement 17. This is because they are built into the design of the scheme. This is managed through requirement 3 (detailed design approval). Requirement 3 states that no phase	HE to confirm whether they are happy with the approach to exclusion zones.	Not yet agreed

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	Archaeological Exclusion Zones	<p>of the development may commence until details of the layout of the phase have been approved by the LPA. Requirement 3(2) states that the detail must accord with the site location plan, works plan and design parameters and principles.</p> <p>Sufficient protection has been provided to those exclusion sites within the wording of the DCO.</p>		
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A1 Record of Engagement

Date	Method of Engagement	Purpose/Description
23/10/2023	Email to Historic England	Email to Historic England informing them of the launch of early informal consultation.
04/12/2023	Email from Historic England	Response to the early informal consultation
20/01/2025	Email to Historic England	S42 Notification
03/03/2025	Email from Historic England	Statutory consultation response
15/07/2025	Email	S56 Notification
11/11/2025	Email	SoCG Rev1 original issued via email attachment to Historic England.
11/11/2025	Email from Historic England	Confirming comments on the draft SoCG would be provided by 25.11.2025.
12/11/2025	Email	Thanking Historic England for the quick response and offered to attend an MS Team meeting to discuss the SoCG if this would help Historic England.
24/11/2025	Email from Historic England	Comments on the draft SoCG provided via attachment to email. Contact at Historic England confirmed annual leave dates 25.11.2025 to 05.12.2025 and 20.12.2025 to 05.01.2026 but was willing to attend an MS Team meeting.
25/11/2025	Email	Thanking Historic England for comments on the SoCG, confirmed these would be reviewed and the Applicant would come back to Historic England.
9/12/2025	Email	Email discussing SoCG and requesting availability for a meeting to discuss
16/12/2025	Email	Follow up email to query availability for a meeting to discuss SoCG
17/12/2025	Call and Email	Call and follow up email to confirm date of meeting to discuss SoCG
17/12/2025	Email from Historic England	Confirmation of availability for meeting re SoCG
18/12/2025	Emails to/from Historic England	Confirming time for meeting re SoCG

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06/01/2026	Teams Meeting	Meeting to run through and discuss SoCG, with aim to issue updated draft which could be largely agreed upon, and to provide information with regard to any specific queries.
08/01/2026	Email	Follow up email re SoCG and timescales
08/01/2026	Email from Historic England	Response from HE and update that they were discussing the SoCG internally
08/01/2026	Email	Response confirming receipt and thanking for update
14/01/2026	Email	Issued amended version of SoCG following run through at meeting, along with information on the landscape and ecology mitigation strategy and summary of views, as requested
16/01/2026	Email	Follow up email to confirm receipt
19/01/2026	Call	Call to query timings re feedback on updated SoCG (HJ not reachable – message left with colleague)
19/01/2026	Email	Follow up email to query timings re feedback on updated SoCG
21/01/2026	Call	Follow up call to chase response to SoCG (HJ not reachable – message left)
30/01/2026	Email	Follow up email to chase up response to SoCG
03/02/2026	Email	Follow up email to chase response to SoCG and query meeting attendance with NCC
03/02/2026	Call	Follow up call to chase response to SoCG (HJ not reachable – message left)
06/02/2026	Call	Follow up call to chase response to SoCG (HJ not reachable – message left with colleague)
09/02/2026	Teams meeting with Historic England and Archaeological Advisors to Nottinghamshire County Council to discuss approach to archaeology	HJ apologised and noted that she had been holding off responding to the SoCG until this meeting had taken place but was aiming to issue shortly.
17/02/2026	Call	Follow up call to chase response to SoCG (HJ not reachable – message left)

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19/02/2026	Email	Follow up email to chase response to SoCG following on from meeting with NCC
24/02/2026	Call	Follow up call to chase response to SoCG (HJ not reachable – message left)
05/03/2026	Email	Follow up email to chase response to SoCG
10/03/2026	Call	Follow up call to chase response to SoCG (HJ not reachable – message left)

A2 Signature Sheet

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

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

Duly signed and authorised on behalf of
Historic England

Name:	
Job Title:	
Date:	
Signature:	