
Steeple Renewables Project

Statement of Common Ground between Applicant and Natural England

March 2026

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Prepared By	The Steeple Renewables Project Consultant Team	
Version History		
Version	Date	Version Status
Draft	November 2025	Rev 1
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Table of Contents:

1	Introduction.....	3
2	Current Position.....	4
3	Appendix A1 - Record of Engagement.....	12
4	Appendix A2 – Signing Sheet.....	13

Table of Contents:

Table 1 – Matters Engaged in this SoCG	4
Table 2 – Current position of matters relevant to the parties’ discussions.....	5

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 Natural England ('NE') 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 currently at completed stage. Matters engaged are summarised in Table 1.

Table 1 – Matters engaged in this SoCG

BMV Agricultural Land	Ecology	All SSSI	Shadow Habitat Regulation Assessment	Biodiversity Net Gain	Protected species licences

2 Current Position

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

Row ID	Topic	Applicants Position	NE’s Position	Status
NE 1	BMV Agricultural Land	<p>ES Chapter 15: Land Use and Agriculture [APP-072B] has had regard to agricultural land quality and identified the grade of land within the Order Limits. ES Appendix 15.1 Agricultural Land Classification Report [APP-131] provides more detail of the land classification within the Order Limits and ES Appendix 15.2 outline Soil Management Plan [APP-132] details how soil within the Order Limits will be managed for the lifetime of the Proposed Development.</p> <p>Approximately 72.1% of the land within the Order Limits forms BMV land.</p> <p>The site will remain in agriculture as it will be grazed.</p> <p>ES Appendix 4.1 outline Construction Environmental Management Plan (oCEMP) [REP5-019], ES Appendix 4.4 Outline Operational Environmental Management Plan (oOEMP) [REP5-025] and ES Appendix 4.2 Outline Decommissioning Plan (oDP) [REP5-021] detail phases of development and impact to BMV agricultural land.</p> <p>A revised outline Soil Management Plan was issued to Natural England on 12/01/2026 for comment (prior to submission at Deadline 3 [REP3-027]) to include the cable corridor (in this case about 1km) and</p>	<p>Natural England have reviewed the additional information provided by the application throughout the examination, including: 8.39 Written Summaries of Oral Submissions - CAH1, ISH2, ISH3 (Revision 1) [REP4-031], 8.35 BMV Note [REP3-049], 6.3.15 Appendix 15.2 - Outline Soil Management Plan (Clean) (Revision 2) [REP3-027], and most recently the updated Chapter 15 - Land Use and Agriculture (Tracked) (Revision 2) [REP5-016].</p> <p>Previous concerns raised with regard to the below items have either been addressed and agreed, or NE consider them unlikely to make a material difference to our advice or the outcome of the decision-making process:</p> <ul style="list-style-type: none"> - NE12 – ALC Survey Methodology – Absence of ALC Survey across the full order limits. - NE13 – Development Design and Avoidance of Best & Most Versatile (BMV) Land – Limited consideration of avoidance of BMV land. - NE14 - ALC Survey Results and Data Presentation – Recommendation for presentation of the areas, and amounts of BMV land, used for temporary construction works (e.g. construction compounds). 	<p>Agreed</p> <p>Agreed</p> <p>Agreed</p>

**Statement of Common Ground between Applicant and
Natural England
Steeple Renewables Project**

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	<p>the environmental enhancement areas, as well as a few other amendments, which are listed at the start of the document.</p> <p>A further BMV Note document has also been provided to Natural England on 12/01/2026 (prior to submission at Deadline 3) regarding the micro-siting points under amber for NE13. Requirement 7 (CEMP), 9 (OEMP), 11(SMP) and 21 (Decommissioning and Restoration Plan) of the dDCO [REP5-005] secure further details of each plan.</p> <p>At Deadline 5 the Applicant submitted a revised ES Chapter 15: Land Use and Agriculture [REP5-015], ES Chapter 18: Summary [REP5-017] and ES Non-Technical Summary [REP5-013] regarding the matter of potential effects arising from provision of new woodland and ponds. In a worst-case scenario, the permanent loss for ponds of c 1 ha of agricultural land (likely mostly non-BMV) and the potentially permanent downgrading of circa 12.1 ha of mostly BMV land for woodland planting, would be a medium magnitude impact, on land of high sensitivity, which would result in an effect of moderate significance. Taking this worst-case assessment the effect is therefore significant.</p> <p>No other significant adverse residual effects are identified for the construction, operation and decommissioning phases of the Proposed Development in regard to land use and agriculture.</p> <p>There are no overriding environmental constraints which would preclude the Proposed Development on the Site. The design of the Proposed Development has taken account of the likely significant</p>	<ul style="list-style-type: none"> - NE17 – Soil Management – Recommendation to include Natural England as a consultee on the final Soil Management Plan. - NE18 – Soil Reinstatement – Recommendation for clearer commitment to restoration of all land disturbed during construction to be reinstated to it’s original ALC grade. - NE19 – Soil Monitoring and Research – Recommendation for additional soil monitoring and research through the project. <p>For further detail please see NE’s most recent Risk and Issues Log, which will be submitted at D6.</p>	<p>Agreed</p> <p>Agreed</p> <p>Agreed</p>
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		environmental effects (alone and in-combination with other cumulative developments), and, where necessary, mitigation measures form an integral part of the Proposed Development to ensure that the environment is suitably protected.		
NE 2	Ecology	<p>ES Chapter 7: Ecology & Biodiversity [APP-065] includes an assessment of the Proposed Development’s impact on ecological receptors supported by extensive survey work to confirm the designated sites, and the habitats and species, that are likely to be affected by the Proposed Development.</p> <p>The Proposed Development will minimise impacts on protected species and habitats in line with national policy. Appropriate Ecological habitat will be provided during operation of the Proposed Development impact for relevant species through mitigation, compensation and enhancement.</p> <p>A Skylark Mitigation Strategy is presented in ES Appendix 7.13 [APP-115], which shows further details and the locations of the measures at the Site.</p> <p>Buildings and trees with bat and barn owl suitability will be retained, thereby avoiding direct impacts upon potential bat roosts.</p> <p>Where possible existing field boundary hedgerows will be retained and enhanced. Whilst the loss of some vegetation will be required, this loss will be kept to a minimum and is outweighed by proposed additional planting and mitigation measures.</p>	NE note that this topic is extremely broad and includes matters we have not reviewed. As such, we cannot agree nor disagree. All items relevant to NE’s remit have been captured in other topics within this document.	Agreed

		<p>Existing hedgerows, trees and woodland to be retained will be buffered from the development and habitat diversity will be managed as set out in the ES Appendix 7.12 outline Landscape Ecology Management Plan (oLEMP) [APP-116]. Widths of the buffers vary according to the value of trees and hedgerows, possible bat roosts etc.</p> <p>Requirement 6 (LEMP) of the dDCO [REP5-005] secure further LEMP details including 10% BNG. Requirement 7 (CEMP) of the dDCO [REP5-005] secures additional ecological details including pre-construction surveys for protected species and a habitat constraints plan.</p>		
NE 3	All SSSIs	<p>An assessment of the potential impacts of the Proposed Development on relevant nationally designated statutory sites (including Clarborough Tunnel) and the need for further mitigation is included in ES Chapter 7: Ecology & Biodiversity [REP3-009]. Due to the nature of the Proposed Development and the separating distance from any areas of development within the Site, no direct or indirect impacts on the interest of Clarborough Tunnel SSSI are anticipated. No mitigation towards Clarborough Tunnel SSSI is necessary.</p> <p>Clarborough Tunnel SSSI has also been considered within the Construction Dust Risk Assessment in ES Appendix 14.1(C) - Air Quality Appendices [APP-130]. This SSSI is classified as a medium sensitivity receptor to dust but when combined with distance from the source of dust emission is defined as having a low area sensitivity, in line with IAQM guidance.</p>	Natural England concur that impacts to any SSSIs during construction, operation and decommissioning are unlikely. Further detailed comments are provided at NE7-NE9 of our Relevant Representations [RR-054] .	Agreed

		Nevertheless, the Applicant has committed to producing a Dust Management Plan when detailed construction information is available, as secured within ES Appendix 4.1 outline Construction Environmental Management Plan (oCEMP) [REP5-019] and requirement 7 of the dDCO [REP5-005] . This will detail how to practically implement the mitigation measures proposed, including monitoring, during construction when dust emissions are most likely to be generated by the Proposed Development.		
NE 4	Shadow Habitat Regulation Assessment (sHRA)	<p>The Information to Inform Habitats Regulation Assessment (sHRA) [REP5-011] concludes the Proposed Development is not likely to have a significant effect on any of the following designated sites either alone or in-combination:</p> <ul style="list-style-type: none"> • Birklands and Bilhaugh SAC. • Hatfield Moor SAC. • Humber Estuary SPA. • Humber Estuary Ramsar. • Humber Estuary SAC. • Thorne and Hatfield Moors SPA; and, • Thorne Moor SAC. <p>There is no requirement to progress to Stage 2 of the appropriate assessment process (the test of ‘adverse effect on integrity’).</p>	NE concur with the conclusion of the sHRA. Further detailed comments are provided at NE1-NE6 of our Relevant Representations [RR-054] .	Agreed

**Statement of Common Ground between Applicant and
Natural England
Steeple Renewables Project**

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NE 5	Biodiversity Net Gain	<p>Section 5 and 6 of the Planning Statement [REP2-040] set out the Environment Act 2021 will make it mandatory for NSIPs to deliver 10% BNG, but this is not yet applicable for NSIPs.</p> <p>ES Appendix 7.12 Biodiversity Net Gain Report [APP-114] sets out the results of the Proposed Development’s BNG assessment and concludes an overall net gain of 10%.</p> <p>Requirement 6 (LEMP) of the dDCO [REP5-005] sets out how a minimum of 10% biodiversity net gain will be achieved.</p>	<p>It should be noted that Natural England have not reviewed the Biodiversity Metric in detail. Nonetheless, Natural England welcome the commitment to deliver a minimum of 10% BNG, in line with the intended mandate due to come in to force May 2026 (Biodiversity net gain for nationally significant infrastructure projects).</p> <p>Natural England continue to encourage the applicant to secure gains in excess of the minimum 10%, as demonstrated within the Biodiversity Metric Calculations.</p>	Agreed
NE 6	Protected species licences	<p>The need for protected species licences is considered within ES Chapter 7: Ecology and Biodiversity [REP3-009]. The outcome is that licences for bats and great crested newts are not likely to be required. A badger development licence is likely to be required for temporary impacts to a small number of setts.</p> <p>Table 1 part 7 of the Consents and Agreement Position Statement [APP-181] confirms the Applicant proposes to submit a draft badger licence application to Natural England. The draft licence application will assess the realistic worst-case impacts to badgers and their setts to identify the activities that may require licence and agree appropriate mitigation so that Natural England may issue a Letter of No Impediment regarding protected species licencing.</p>	<p>As stated, a LoNI with regard to badger licencing has been issued by NE on the 23rd March 2026 and was submitted into the examination at Deadline 5 [REP5-054].</p>	Agreed

**Statement of Common Ground between Applicant and
Natural England
Steeple Renewables Project**

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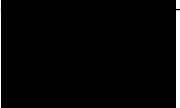
		<p>The Applicant spoke with NE on 21 November 2025 to clarify the intended timescale for a draft license application to be submitted to NE.</p> <p>The Applicant confirmed the intent is to submit the draft application before the end of January 2026. NE advised that it would normally take around 30 working days to issue the Letter of No Impediment (LoNI). Therefore, the Applicant considers that it will be able to provide the LoNI before close of examination.</p> <p>A LoNI application was submitted to NE on the 29th January 2026. The LoNI was subsequently issued by NE on the 23rd March 2026 and was submitted into the examination at Deadline 5 [REP5-054].</p>		
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A1 Record of Engagement

Date	Method of Engagement	Purpose/Description/Description
20/01/2025	Email	S42 Notification
15/07/2025	Email	S56 Notification
11/11/2025	Email	Draft SoCG emailed to Natural England
21/11/2025	Email from Natural England	Comments on SoCG provided
12/01/2026	Email	Revised outline Soil Management Plan and BMV note emailed for comment
13/01/2026	Email	Rev 2 SoCG emailed to Natural England via email attachment
16/01/2026	Email from Natural England	Comments on Rev 2 SoCG provided via email attachment
19/01/2026	Email	Clean SoCG Rev2 issued for signing
21/01/2026	Email from Natural England	Signed SoCG Rev 2 provided via attachment to email
30/01/2026	Email	Chasing updates on 2 principal matters left to be agreed in the SoCG
06/02/2026	Email	Chasing updates on 2 principal matters left to be agreed in the SoCG
06/02/2026	Email from Natural England	Apologised for the delay in responding and confirmed comments would be provided as soon as possible the following week
11/02/2026	Email from Natural England	Comments provided on amended documents provided at Deadline 3 and two principal matters left to be agreed in the SoCG
03/03/2026	Email	Setting out further possible amendments to documentation to address the concerns raised by NE
11/03/2026	Email from Natural England	Further advice provided regarding the two principal matters left to be agreed in the SoCG
27/03/2026	Email	Rev 3 SoCG emailed to Natural England via attachment to email
31/03/2026	Email from Natural England	Rev 3 SoCG returned signed via attachment to email

A2 Signing Sheet

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

Name:	Will Bridges
Job Title:	DCO Lead Developer
Date:	02/04/2026
Signature:	

Duly signed and authorised on behalf of
Natural England

Name:	
Job Title:	Senior Sustainable Development Officer – East Midlands Area Team
Date:	31/03/2026
Signature:	 