
Steeple Renewables Project

Statement of Common Ground between Applicant and Nottinghamshire County Council

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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 County Council ('NCC') 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 draft stage. Matters engage are summarised in Table 1.

Table 1 – Matters engaged in this SoCG.

Ecology	
Biodiversity Net Gain	
Protected Species License	
Draft DCO	
Highway Work Permits	
Energy Generation	
Site Selection and Design Approach	
Benefits	
Grid Connection	
Fire	
Impacts on Local Communities	
Health and Wellbeing	
Waste	
Local Plan Waste Policy compliance	
Waste Cumulative Effects	

Historic Environment - Methodology	
Historic Environment – Specific Assets	
Historic Environment – Specific Assets 2	
Approach to Archaeology	
Historic Environment – Design and Layout	
Historic Environment - Fixed Elements	
Historic Environment – Further Evaluation	
Historic Environment - Mitigation	
BMV Agricultural Land	
Landscape and Visual Amenity	
Glint and Glare	
Employment	
Traffic and Transport	
Flood Risk	

Surface and Foul Water Drainage	Planning Policy Compliance

1.4 Development Consent Order

1.4.1 It is agreed that Bassetlaw District Council will act as a relevant planning authority in relation to the discharging of Requirements of the DCO applicable to their administrative area and local planning authority boundary. Where the expertise of Nottinghamshire County Council is required then the County Council will either be the discharging authority or subject to consultation during the approval process, or vice versa as appropriate.

1.5 Local Planning Policy Context

1.5.1 It is agreed that the development plan applicable to the development proposed comprises:

- Bassetlaw Local Plan 2020-2038 (BLP) (Adopted 29th May 2024);
- Nottinghamshire Minerals Local Plan (NMLP) (Adopted March 2021) and
- Nottinghamshire and Nottingham Waste Local Plan (NNWLP) (Adopted September 2025)

1.5.2 Neighbourhood Plans covering part of the Order Limits comprise:

- Sturton-le-Steeple, Bole, & West Burton Neighbourhood Plan (Area Designated 08th December 2022)¹;

¹ Whilst the new designation replaces the previous Sturton Ward Neighbourhood Area, the existing Sturton Ward Neighbourhood Plan remains valid until any new neighbourhood plans are produced.
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- North Leverton with Habbleshthorpe Neighbourhood Plan (Designated 08th December 2022)²;
- North and South Wheatley Neighbourhood Plan (Designated 08th December 2022)³;
- Sturton Ward Neighbourhood Plan (Made following a referendum held 11th February 2016). It was reviewed and adopted following a referendum held 11th November 2021)⁴; and
- Clarbrough Neighbourhood Plan (Made following a referendum held 02nd February 2017).

1.5.3 Table 2 covers the local plan policies which are considered important and relevant.

1.6 Impacts of the Development

1.6.1 It is agreed that all environmental constraints and sensitive receptors relevant to the determination of the application have been considered in the application plans and documents.

1.6.2 It is agreed that the development proposed is an EIA development, and the submitted EIA assess the realistic worst-case effects of the development.

1.6.3 The parties agree that, except for the impacts listed under Table 1, the proposal includes mitigation measures that are capable of reasonably and satisfactorily addressing all other substantive impacts of the proposal necessary to make the development acceptable in planning terms.

1.7 Requirements

1.7.1 It is agreed that the DCO Requirements will be necessary to address the following matters:

- Commencement of the authorised development

² Whilst the new designation replaces the previous Sturton Ward Neighbourhood Area, the existing Sturton Ward Neighbourhood Plan remains valid until any new neighbourhood plans are produced.

³ Whilst the new designation replaces the previous Sturton Ward Neighbourhood Area, the existing Sturton Ward Neighbourhood Plan remains valid until any new neighbourhood plans are produced.

⁴ In December 2022 the Bassetlaw District Council approved the designation the previously mentioned three new neighbourhood areas to replace the existing Sturton Ward Neighbourhood Area. They do not change the validity of the existing Sturton Ward Neighbourhood Plan but will allow it to be replaced by the three separate neighbourhood plans in due course, one for each new neighbourhood area.

- Phasing the authorised development and date of final commissioning
- Detailed design approval and reimbursement for NCC's Section 278 technical audit process to ensure Highways design and specification compliance (Highways Act 1980)
- Establish a traffic liaison communication group to ensure the DCO works programme are properly coordinated with NCC's existing street works permit, (notification - tracking - inspection - reinstatement) & Temporary Traffic Regulation Order process. Improved road works coordination and reduced disruption on the highway are managed through the digitised Street Manager service (DfT) as part of the powers granted by the Traffic Management Act 2004
- Implementation and maintenance of landscaping
- Arboricultural method statement
- Landscape ecological management plan
- Construction environmental management plan
- Construction traffic management plan
- Operational Environmental Management Plan
- Fire risk management plan
- Soil Management Plan
- Land Contamination
- Public Rights of Way Diversion
- Operational noise
- Fencing and other means of enclosure
- Surface and foul water drainage
- Archaeology
- Permissive paths

- Construction hours
- Protected species
- Decommissioning and restoration
- Supply chain, employment and skills
- Requirement for written approval
- Amendments to approved details
- Consultation

1.7.2 A schedule of DCO Requirements is included in the draft DCO **[REP5-005]**.

2 Current Position

2.1.1 Table 2 on the next page provides a summary of the current position of the Applicant and NCC 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	NCC’s Position	Status
NCC 1	Ecology	<p>ES Chapter 7: Ecology & Biodiversity [REP3-009] 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</p>	<p>NCC can confirm the ES chapter provides an adequate assessment of the proposal on ecological receptors and provides adequate mitigation measures to protect notable and protected species.</p> <p>NCC notes the Applicants position in respect of invasive weeds and management of existing ditches at the site. Further consideration of this issue should be made in the Landscape and Environmental Management Plan</p> <p>The complete removal/control of this invasive species should be considered as part of overall site enhancements. Removal/control of this species should be sought as part of the management regime of the site to prevent this species spreading further outside of the application sites boundary. This species can be very easily carried by birds. This also would not impact the ditches from a flood defence perspective as there would be no alterations to the current management regime.</p>	Agreed (subject to difference regarding invasive species in ditches)

		<p>be required, this loss will be kept to a minimum and is outweighed by proposed additional planting and mitigation measures.</p> <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 [REP3-005] secures additional LEMP details.</p> <p>Table 3.3 of the ES Appendix 4.1 Outline Construction and Environmental Management Plan (oCEMP) [REP5-019] confirmed that no works will be undertaken within the channel of the Mother Drain (where Canadian waterweed is present) and the spread of the species is therefore highly unlikely to take place. Nonetheless, an Invasive Non-Native Species (INNS) Management Plan will be produced separately which will set out control measures to be adopted to minimise the risk of spread of invasive species during the construction phase, including pre-commencement checks and establishing exclusion zones where invasive plant species are identified.</p> <p>The suggestion of complete eradication is noted, but at this time the only watercourse stretch with Canadian waterweed</p>		
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		(Mother Drain, close to Littleborough Road) is just outside of the Eastern Biodiversity Mitigation Area and lies outside of the Order Limits and is not under the control of the Applicant.		
NCC 2	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>With regard to maintaining maintenance of ecological condition of retained natural features, this is addressed in the oLEMP (for example, Paragraphs 5.9, 7.1, 8.3, 9.6, 11.3, 13.4, 14.3), which identify the current ecological condition of the retained habitats and that these will be retained. Requirement 6 of the dDCO [REP5-005] ensures the specifications outlined in the oLEMP are carried through to the final LEMP.</p>	Over 10% net gain is easily achievable for the proposals and has been demonstrated. This should be secured for the life of the solar farm.NCC notes that provisions for ensuring that retained natural features maintain their ecological condition are set out in the OLEMP and will be carried through to the final LEMP	Agreed
NCC 3	Protected Species License	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.	This has been outlined within the ES, only badger setts which cannot be avoided will be subject to temporary closure under licence from NE. This is considered a suitable approach.	Agreed

		Table 1 part 7 of the Consents and Agreement Position Statement [REP1-006] 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.		
NCC 4.1	Draft Development Consent Order	<p>There is no freehold acquisition of public highways sought in the dDCO [REP5-005] 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 Outline Construction Traffic Management Plan (OCTMP) [REP5-05] at paragraph 4.53, as secured in the dDCO [REP5-005] at Requirement 8, provides that Stage 1/2 road safety audit (RSA1/2) will be carried out at the proposed primary accesses prior to works being carried out in the public highway and that the detailed design of such works will be submitted to the LHA Street works team for approval.</p> <p>The Applicant acknowledges NCC's position and is committed to engaging further with NCC to agree a technical approval process to be included within the oCTMP to permit the approval of the detailed CTMP post-consent.</p>	<p>See comment under NCC 28 about the implementation any works affecting public highway.</p> <p>The DCO works programme needs to integrate into the existing the Local Highway Authority's (LHA) Section 278 technical design & specification approval process with appropriate reimbursement for the LHA, (12% of estimated costs). Furthermore, the programming of the works needs to minimise disruption and amalgamate with the LHA's street works permits/licenses scheme, traffic management requirements and public notification & communication system. NCC notes the intention within the dDCO to confirm a technical approval process with the LHA street works but believes this matter should be best confirmed in advance within the oDCO. NCC notes the amendments proposed to the oCTMP referencing the technical approval process and supports this.</p>	Agreed

		<p>The method to secure the proposed detailed access design through the DCO process is set out in paragraphs 4.51 to 4.56 pages 18 and 19 of the oCTMP [REP5-035].</p> <p>DCO Articles 10, 11 and 13 relate to the DCO requirements for this to be undertaken. Where the Applicant exercises its powers under Article 8, this section will not apply. The Applicant will follow the procedure for street works set out in the New Roads and Street Works Act 1991 which is at article 9 (application of the 1991 Act) of the Order. The proposed access designs are proposed with reference to the NCC design guide and will be exercised subject to article 10 of the Order (power to alter layout of streets) shall be carried out with the consent of NCC. This reflects article 10(4)-(7). In seeking the consent pursuant to article 10, the Applicant will provide detailed layouts which will include details of road signage, road markings etc, and the results of a RSA1/2.</p> <p>The Applicant commits to providing a programme of works as part of detailed design. alongside construction method and traffic management requirements which will be shared with and approved by NCC prior to construction. DCO Article 14, ensures that should the Applicant require traffic management, the traffic authorities consent is required and therefore the above will be provided for that consent.</p>		
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		<p>Details of the appropriate health and safety information and details of the main contractor including their insurance provision required under the Construction, Design & Management Regulations or equivalent legislation will be available by the Applicant prior to commencement of any works in the highway.</p> <p>The Applicant will submit to the highway authority for approval a technical audit of the highway works, and a PPA can include payment of the appropriate fees in that instance, which will be confirmed with NCC at the detailed design and technical approval stage.</p> <p>The dDCO [REP5-005] is based on legal precedent and includes the appropriate structure, scope, provisions, requirements and protective provisions.</p>		
NCC 4.2	Highway Work Permits	Highway works are proposed to be secured through the New Roads and Street Works Act 1991 (application of the 1991 Act).	Request the use of Nottinghamshire County Council Permit Scheme to control the undertaking of registerable works on the public highway.	Not Agreed
NCC 5	Energy Generation	The Planning Statement [REP2-040] sets out the Proposed Development will generate 600MW of low carbon electricity equating to the annual energy consumption of approximately 180,000 households (roughly half of the homes in Nottinghamshire).	NCC notes this statement.	Agreed

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		The Grid Connection Statement [APP-056] confirms the Applicant has secured a grid connection sufficient to serve the amount of power proposed to be generated.		
NCC 6	Site Selection and Design Approach.	<p>Design details are provided in the Design and Access Statement [REP2-042], Design Approach Document [REP2-045] and at ES Appendix 4.5 Outline Design Principles [REP2-031] which will be a certified document and secured by Requirement 3 of the dDCO [REP5-005].</p> <p>Consultation is a necessary part of the Examination process and is in-built into Requirement 3 for submission of the final design details to be submitted to and agreed in writing by the relevant local planning authority.</p> <p>Design of the Proposed Development, and its' main components have been sited carefully to avoid impacting West Burton A Power Station. The design of the Proposed Development is in accordance with relevant Health and Safety Legislation. The health and safety of workers in the construction, operation and decommissioning stages of the Proposed Development has been assessed in the Major Accidents and Disasters section of ES Chapter 17: Miscellaneous Issues [APP-074].</p>	NCC notes this statement.	Agreed

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		Further information on hazardous substance consent will be sought from Bassetlaw District Council to accompany the DCO application.		
NCC 7	Benefits	<p>The Planning Statement [REP2-040] sets out the Proposed Development will also deliver national economic and social benefits in line with the Government’s wider objectives of sustainable development. The pressing need for the Proposed Development is compelling and supported by its status as CNP infrastructure.</p> <p>Localised economic (including through the creation of jobs and use of accommodation stock), 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 benefits (including in surface water drainage, flood attenuation, natural wetland habitat, 10 % biodiversity net gain and water quality management) will also be delivered by the Proposed Development.</p>	NCC notes this statement.	Agreed
NCC 8	Grid Connection	The Grid Connection Statement [APP-056] sets out details of the Applicants Grid Connection including works, design, consent and construction responsibilities. The Note on Scheme Efficiency document [REP2-044] sets out the Scheme’s grid connection agreement has a 600MW export AC capacity	No comment.	Agreed

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		(Maximum Export Capacity or MEC) shared between the Solar Project and the BESS, respectively 450 MWAC and 150 MWAC.		
NCC 9	Fire	<p>The Major Accidents and Disasters section of ES Chapter 17: Miscellaneous Issues [APP-074] assesses the risk of an uncontrolled fire event to relevant residents, habitats and species, landscape features, surface water and groundwater. It is acknowledged that in the unlikely event of a fire, air pollutants could be released. Appropriate mitigation measures are secured through ES Appendix 4.1 Outline Construction and Environmental Management Plan (oCEMP) [REP5-019], ES Appendix 4.4 Outline Operation Environmental Management Plan (oOEMP) [REP5-025] and ES Appendix 4.2 Outline Decommissioning Plan (oDP) [REP5-021] and ES Appendix 4.3 Outline Fire Risk Management Plan (oFRMP) [REP5-023].</p> <p>Requirements 7 (CEMP), 9 (OEMP), 10 (Fire Risk Management Plan) and 21 (Decommissioning and Restoration) of the dDCO [REP5-005] secure further details of each plan.</p>	This is a matter for a proposed SoCG with Nottinghamshire Fire and Rescue Service as referred to by the applicant during ISH2.	Not applicable to NCC
NCC 10	Impacts on Local Communities	<p>Impacts to the local community have been considered in relevant Chapters of the Environmental Statement ('ES') [APP-058 to APP-075, REP2-018, REP2-020, REP3-009, REP5-015, REP5-018].</p> <p>ES Appendix 4.1 outline Construction Environmental Management Plan (oCEMP) [REP5-019], ES Appendix 4.4</p>	NCC agrees that relevant chapters of the ES and sections of the oCEMP have considered impacts to the local community and requirements of the dDCO secure further details of each plan.	Agreed

		<p>outline Operational Environmental Management Plan (oOEMP) [REP5-025] and ES Appendix 4.2 outline Decommissioning Plan (oDP) [REP5-021] provide safeguards to local communities through the various phases of development.</p> <p>ES Appendix 13.2 outline Construction Traffic Management Plan (oCTMP) [REP5-035] includes measures to manage construction vehicle access and routing to the order limits. This includes traffic routing avoiding Sturton-le-Steeple village and routing for abnormal loads to ensure access roads are suitable for transportation of components to the site.</p> <p>Requirements 7 (CEMP), 8 (CTMP), 9 (OEMP) and 21 (Decommissioning and Restoration) of the dDCO [REP5-005] secure further details of each plan.</p>		
NCC 11	Health and Wellbeing	<p>The Health Impact Assessment [APP-183] addresses how the Proposed Development may affect wellbeing. The HIA notes that as far as possible, avoidance and minimisation of how the possible effects by the Proposed Development are managed through embedded design in terms of layout.</p> <p>Further safeguards are provided during construction through ES Appendix 4.1 Outline Construction Environmental Management Plan (oCEMP) [REP5-019], operation through ES Appendix 4.4 Outline Operation Environmental Management Plan (oOEMP) [REP5-025] and decommissioning</p>	NCC notes the applicant's position and concurs with it.	Agreed

		<p>through ES Appendix 4.2 Outline Decommissioning Plan (oDP) [REP5-021].</p> <p>Requirements 7 (CEMP), 9 (OEMP) and 21 (Decommissioning and Restoration) of the dDCO [REP5-005] secure these safeguards.</p>		
NCC 12	Waste	<p>ES Chapter 17 (Miscellaneous Issues) [APP-074], Planning Statement [REP2-040], 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] have considered waste from all phases of development (construction, operation and decommissioning) and the potential for cumulative effects has been considered. Specifically, ES Appendix 4.1 Outline Construction and Environmental Management Plan (oCEMP) [REP5-019] and ES Appendix 4.2 Outline Decommissioning Plan (oDP) [REP5-021] include details of how waste is managed in accordance with the waste management hierarchy.</p> <p>Requirements 7 (CEMP), 9 (OEMP) and 21 (Decommissioning and Restoration) of the dDCO [REP5-005] provide further safeguards.</p> <p>At Deadline 3 the Applicant provided a Local and Regional Landfill Capacity Assessment [REP3-038]. This document</p>	<p>The Council notes and recognises that the documents referred to in the submission of this application aim to handle waste as high up the waste hierarchy as possible and is supportive of this approach. However, the application assumes that at the decommissioning stage, there will be recycling facilities available, at the volumes required, to recycle the PV Panels. Currently limited facilities exist across the region and if not developed further, may place pressure on landfill capacity which is limited in Nottinghamshire and nationally</p> <p>The County Council notes the deadline 3 submission of a Local and Regional Landfill Capacity Assessment which helps assess the potential impact of the development on waste facilities. We agree that a realistic worst case 70% waste recovery rate of material in the construction, operation and de-commissioning stages is appropriate. We agree that recycling and landfill capacity should be assessed on a region wide basis and do not dispute the limited impact on landfill resulting which resolves the issue originally raised.</p>	Agreed

		<p>established two study areas, local (Proposed Development Study Area) and Regional (East Midlands for non-hazardous and inert waste management). Hazardous waste is managed at national level and therefore the study area for hazardous waste is England.</p> <p>A waste recovery rate of 70% is assumed to be achievable for construction, operation and decommissioning for the purpose of this assessment. This is in line with national target for recovery of construction and demolition (C&D) waste of 70% by weight, as set out in the revised Waste Framework Directive (2025) and the Waste Management Plan for England. IEMA Guidance outlines that a good practice landfill diversion target of 90% has been achieved and exceeded by major UK developments. In 2020, the most recent year for which data is available, the UK generated 59.4 million tonnes of non-hazardous C&D waste, of which 55 million tonnes was recovered representing a recovery rate of 92.6%. The applicant is committed to reuse and recycling as much waste as possible.</p> <p>In conclusion the assessment shows that under realistic worst case (with 70% recovery) cumulative impacts would not be significant (below 1%). Absolute worstcase assessment (assuming zero recycling/ recovery, would not be realistic due to commitments and regulatory controls) cumulative impacts would not be significant (below 1%). For an effect on hazardous</p>	<p>However, the applicant still assumes that facilities for recycling will increase over time, and it is our position that the solar industry should assume responsibility to promote the development of recycling facilities and should work proactively with the Waste Planning Authorities to mitigate the risk that capacity to recycle solar panels is not developed.</p> <p>To overcome this concern, NCC requests that the Applicant commits to providing details of expected waste arisings, and of their proposed treatment, from operation and decommissioning within the OEMP and DEMP, as well as a commitment to provide an annual planning maintenance schedule via the Outline CEMP. It is considered that data and reporting on waste types and volumes will support regional waste planning and ensure waste mitigation measures are updated throughout the operational phase. These commitments have been agreed in relation to the One Earth Solar Farm project and have been requested for the Great North Road Solar project. We welcome the commitment to develop a Site Waste and Materials Management Plan (SWMMP) prior to the start of commencement and included as an appendix to the CEMP. This should be updated during the life of the development in consultation with waste planning authority in order to support the planning of appropriate recycling facilities</p>	
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		<p>landfill capacity to cross the threshold of significance is 0.1% of national capacity (9,750m3). Assuming the hazardous waste fraction of waste solar panels sent to hazardous waste landfill a significant effect would occur if the hazardous waste fraction represents 12.17% of the solar panel mass. The majority of solar panel components are, however, non-hazardous waste – approximately 76-76% glass, 10-11% plastic, 8-13% aluminium frame and 1% copper wiring and other metals. This equates to 99% of solar panel components classified as non-hazardous waste and 1% considered hazardous waste. 1% of the solar pV waste is 1,186.76 m3 below 9,750 m3 (the 0.1% hazardous landfill capacity threshold). For a significant effect to occur 8.2% of solar panel mass would have to be classified as hazardous waste and sent to hazardous waste landfill for disposal, which is not the case.</p> <p>The assessment also provided examples of existing companies who are able to recycle waste from solar and BESS developments including “Recycle Solar” based in Scunthorpe, North Lincolnshire, and “SECONDSOL” that provides a marketplace service to purchase and sell second hand PV panels and equipment.</p> <p>Batteries, as things stand, in accordance with WEEE Regulations 2025 and the Waste Batteries and Accumulators Regulations</p>		
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		<p>2009 will likely be undertaken by the battery manufacturer or supplier for recycling into new batteries or reuse.</p> <p>As solar farms and BESS development progress, more facilities will emerge (if necessary) to manage waste they generate.</p> <p>The DCO contains various requirements which seek to secure the applicable safeguards regarding waste applicable to the Applicant’s Local and Regional Landfill Capacity Assessment, including the following secured control documents:</p> <ul style="list-style-type: none"> the Outline Construction Environmental Management Plan (OCEMP) submitted at Deadline 3 [REP3-011], secured within Requirement 7, provides at paragraph 2.15 that the appointed contractors to carry out the work in accordance with the final CEMP will prepare a Construction Resource Management Plan (CRMP) which will specify the waste streams to be monitored and set targets for the re-use and recycling of materials. Table 3.12 provide further evidence to of the mitigations and enhancement measures proposed regarding waste; the Outline Environmental Management Plan (OEMP) submitted at Deadline 3 [REP3-025], secured within Requirement 9, provides at Table 3.14 evidence of the proposed mitigation and monitoring measures 		
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		<p>associated with waste that are to be reviewed and updated post-consent; and</p> <p>the Outline Decommissioning Plan (ODP) submitted at Deadline 3 [REP3-013], secured within Requirement 21, provides within Section 3 evidence of the environmental mitigation and management regarding waste.</p> <p>Revised outline Construction Environmental Management Plan (oCEMP) [REP5-019], outline Operational Environmental Management Plan (oOEMP) [REP5-025] and outline Decommissioning Plan (oDP) [REP5-021] have been submitted at Deadline 5.</p> <p>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 regulations or policies. It would be an appendix to the OEMP and DP (as stated in table</p>		
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		3.14 page 40 of the outline OEMP and table 3.1 page 12 of the outline oDP).		
NCC 13	Local Plan Waste Policy	<p>There are no waste facilities existing (or historical) within the Order Limits, and therefore there is no safeguarding issue. The Planning Statement [REP2-040] outlines Waste at Section 6.14, confirming there is no safeguarding issue.</p> <p>The Waste Section of ES Chapter 17: Miscellaneous Issues [APP-074] details how the Proposed Development is designed, constructed and to be operated under the 'Waste Hierarchy' guidance and abide by the principles of sustainable waste management. An ES Appendix 4.1 Outline Construction and Environmental Management Plan (oCEMP) [REP5-019] and ES Appendix 4.2 Outline Decommissioning Plan (oDP) [REP5-021] are submitted with the DCO application. The Applicant position is the Proposed Development complies with Policies WCS2 and SP1 – this is addressed in Appendix D Local Planning Policy Accordance Table of the Planning Statement [REP2-040].</p>	NCC agree there is no safeguarding issue and that the proposed development complies with Policy SP1 of the Nottinghamshire and Nottingham Waste Local Plan (adopted September 2025).	Agreed
NCC 14	Waste – Cumulative effects	<p>Within the Waste section of ES Chapter 17: Miscellaneous Issues [APP-074], cumulative effects are assessed for the Proposed Development. ES Appendix 4.1 Outline Construction and Environmental Management Plan (oCEMP) [REP5-019] and ES Appendix 4.2 Outline Decommissioning Plan (oDP) [REP5-021] are providing waste management</p>	As in NCC 12, there is an assumption that, at the decommissioning stage, there will be recycling facilities available, at the volumes required, to recycle the PV Panels. Currently such facilities and infrastructure do not exist and if not developed, then this would place pressure on landfill capacity which is limited in Nottinghamshire and nationally.	Agreed

		<p>details of these phases and detailed versions will be prepared in consultation with waste management providers to ensure waste could be accommodated post-consent. The main elements of the Proposed Development are all capable of being recycled, with recycling routes generally available for the materials.</p> <p>Requirements 7 (CEMP), 9 (OEMP) and 21 (Decommissioning and Restoration) of the dDCO [REP5-005] secure these safeguards.</p> <p>Please see applicants response to NCC 12 regarding a Local and Regional Landfill Capacity Assessment [REP3-038] provided at Deadline 3 that addresses the proposals non-significant impact to landfill capacity regionally and nationally, highlights existing companies that can recycle and reuse waste generated as well as reemphasising the Applicant’s commitment to reuse and recycle as much waste as possible the Proposed Development would generate at each phase.</p> <p>Revised outline Construction Environmental Management Plan (oCEMP) [REP5-019], outline Operational Environmental Management Plan (oOEMP) [REP5-025] and outline Decommissioning Plan (oDP) [REP5-021] have been submitted at Deadline 5.</p> <p>A Site Waste and Materials Management Plan (SWMMP) would be developed prior to the start of commencement and included</p>	<p>The County Council notes the deadline 3 submission of a Local and Regional Landfill Capacity Assessment which assumes a worst case 70% waste recovery rate of material in the construction, operation and de-commissioning stages. Whilst this assessment demonstrates the wider availability of landfill facilities and therefore helps resolve concerns regarding local landfill limits on capacity it does not promote recycling of material which is our main concern.</p> <p>We therefore welcome the commitment to develop a Site Waste and Materials Management Plan (SWMMP) prior to the start of commencement and included as an appendix to the CEMP. This should be updated during the life of the development in consultation with waste planning authority in order to support the planning of appropriate recycling facilities</p>	
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		<p>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 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).</p>		
NCC 15	Historic Environment Assessment methodology.	<p>All assets within the study areas relevant to the assessment have been assessed following a staged approach, in line with Historic England Setting GPA 3 (2017 2nd Ed). The assessment of all assets at Step 1/2 of the Historic England approach can be found at Appendix 1 of ES Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122]. Assets taken forward for further steps within the HE guidance and for detailed assessment are outlined within Section 9.6 of ES Chapter 9: Cultural Heritage [APP-067] and Sections 5 and 6 ES Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122].</p> <p>The methodology used to assess the assets has been the same for each asset. There has been no shift in criteria for Scheduled</p>	<p>In terms of setting to archaeological assets (primarily Scheduled Monuments), the County Council agrees that the applicant has followed the relevant HE guidance for settings assessment and included the relevant sites. . Whilst in general agreement e would encourage further consideration of the impact on the setting of the Roman fort, south of Littleborough Lane (NHLE: 1004935). The fort lies in an</p>	Agreed

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		Monuments. The Applicant is therefore unclear as to what NCC are referring to here and seek further information and / or clarity on the issue raised.	elevated position above the Trent flood plain with views across to the site. It lies close to the Segalocum Scheduled Monument which the applicant has flagged for settings impacts but arrives at different outcomes for the Roman Fort..	
NCC 16	Heritage Environment - Assessment of specific assets	<ul style="list-style-type: none"> Crow Tree Farm has been assessed in Appendix 1 of ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]. Listed buildings along Main Street, North Leverton are considered in Appendix 1 of ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]. <p>It is the Applicant's position that these assets would not experience any harm as a result of the scheme and as such, we do not consider it necessary to remove areas of panels.</p>	The County Council has requested that the applicant consider removing some parcels of PV from the scheme to enable views from ROW to be maintained and their contribution to the setting of HAs at Crow Tree Farm, North Leverton protected.	Not agreed
NCC 17	Heritage Environment - Assessment of specific assets	<ul style="list-style-type: none"> The Grade II* Listed Church of St Peter and Paul is assessed in detail in paragraphs 6.4.1-6.4.6 of ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122], and 9.7.17 of ES Chapter 9: Cultural Heritage [APP-067]. This asset would experience a level of adverse impact/less than substantial harm. 	NCC agrees with the applicant's position	Agreed

NCC 18	Historic Environment - Approach to assessment regarding archaeology	<p>A staged approach to assessment has been undertaken with the following elements having been included in the assessment:</p> <ul style="list-style-type: none"> • A review of Historic Environment Record (HER), Portable Antiquities Scheme (PAS) and National Heritage List for England (NHLE) data. • A review of historic maps and documentary sources. • Aerial photograph review and analysis. • A review and analysis of LiDAR data. • A geo-archaeological review. • Site walkovers. • A geophysical survey; and, • A programme of pre-determination trial trench evaluation on fixed, large-scale areas of Proposed Development. <p>The reporting or results of these actions may be contained within one document, but this does not mean the work undertaken is any less or diminish this in any way.</p> <p>The areas of the site which are less flexible and less able to be mitigated effectively have been trenched. This is a proportionate response. High development impact is stated</p>	<p>The applicant has completed a Desk-based Assessment (DBA) (80% of the items they've listed) and geophysical survey of the majority of the site. They have only undertaken 16 trenches as part of the pre-determination evaluation. As a bare minimum, we would expect a complete and reliable assessment to have evaluated (trial trenching) all areas of high archaeological potential and high development impact. The current approach falls well short of this and has not sufficiently identified or described the significance of any archaeological remains, known or as yet unknown, within the order limits.</p>	Not agreed
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		<p>here - however this is demonstrably not the case when looking at the impact of solar schemes.</p> <p>A meeting was held on Monday 9th February to discuss this strategy and discussions are ongoing.</p>		
NCC 19	Heritage Environment - Approach to design and layout of Scheme	<p>The design of the Proposed Development has been archaeologically led and informed by the staged approach to assessment. This is evidenced through the removal of areas of development with the greatest archaeological potential, as identified by evaluative works (geophysical survey), as is outlined in ES Appendix 9.3 - Archaeological Mitigation Statement [APP-124].</p> <p>The geophysical survey has clearly identified deposits of likely archaeological origin in these locations so as to avoid unnecessary removal of archaeology and to preserve these in situ, these have been removed from the Scheme.</p> <p>The areas selected for removal are clearly areas of more complex archaeology, with strong responses and more dense concentrations of anomalies. The areas that haven't been removed are discrete ditches or linear features, less complex or complete enclosures, or discrete less certain anomalies which would not be impacted to any great extent by the Scheme in any case (given the nature of solar construction). There is nothing novel in this approach - this is an approach taken when</p>	<p>The applicant has removed four areas from development based entirely on geophysics results. No attempt has been made by the applicant to establish the character, date, extent, state of preservation or significance of these areas. There are also other areas identified in the geophysics and DBA results that have not been removed from development or properly assessed as described above. We therefore dispute that the proposed development has been 'archaeologically led' in any meaningful way.</p>	Not agreed

		considering archaeological surveys, their results and the impacts of a scheme.		
NCC 20	Historic Environment - Approach to evaluation of fixed elements of scheme	<p>A programme of pre-determination trial trenching on 'fixed' areas of large-scale development was undertaken w/c 28th 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.</p> <p>These other elements (access roads, substations, cable runs, swales, planting, drainage, panel piling areas and compounds) are all flexible and can be amended to ensure these do not cause any below-ground disturbance where required.</p>	The applicant has evaluated a very small area of the fixed infrastructure, primarily the BESS. No other elements including (but not limited to) access roads, substations, cable runs, swales, planting, drainage, panel piling areas and compounds. We agreed to the trenching plan for the BESS work and raised concerns that the applicant was not proposing to properly evaluate the rest of the site.	Agreed for the fixed areas but subject to concerns over evaluation of the rest of the site.
NCC 21	Historic Environment - Approach to further evaluation	<p>Further evaluative trial trenching across the wider area of Proposed Development is proposed post-consent, due to the inherent flexibility of the type and nature of development. This scope of such works will be agreed in consultation with the LPA's archaeological advisor, as outlined in ES Appendix 9.5 - Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126].</p> <p>The approach set out would not put the deliverability of the development at risk due to the flexibility within the proposal with detailed design still to be agreed secured by Requirement 3 of the dDCO [REP5-005]. This includes a number of matters at</p>	While NCC agree that a programme of post-consent evaluation trenching will be necessary, this should not be at the expense of properly evaluating areas of high potential or high impact at the assessment stage to provide a base line of data to inform the development. Leaving the vast majority of evaluation trenching to the post-consent stage introduces significant risk to the deliverability of the scheme and will likely lead to the unnecessary destruction of heritage assets, construction delays and increased costs that could otherwise be avoided.	Not agreed

		sub paragraph 1 of Requirement 3 including 1a the Layout. There will be no unnecessary destruction of heritage assets because evaluation would be carried out followed by mitigation post-consent.		
NCC 22	Approach to mitigation	<p>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 of Investigation for Post-Consent Archaeological Works [APP-126].</p> <p>It was acknowledged in the meeting on Monday 9th January that NCC generally agree with the recommended approaches and responses with regard to further mitigation provided by the outline WSI. What is in dispute is the timings of further trial trench evaluation, which is a separate issue covered by NCC 21 above.</p> <p>The Applicant disagrees with the assertion that a reductive interpretation of Policy has been applied, which has not been clarified or evidenced.</p>	<p>The general outline approach is agreeable (section 5 onwards) and we accept that the areas removed from development and preserved in situ, will be protected from development impacts, subject to the implementation of appropriate archaeological preservation management plans., However, there are numerous issues with the oWSI, not least that it is based on limited data and is vague and uninformed at best on the likely extent of work requirements post-consent. It also contains highly questionable statements and caveats including a reductive interpretation of Policy. Revision is required before it can be agreed.</p>	Not agreed
NCC 23	BMV Agricultural Land	<p>ES Chapter 15: Land Use and Agriculture [REP5-015] 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 (oSMP) [REP3-027]</p>	<p>NCC notes the Applicants position but has not independently assessed the impact of the development on agricultural land so is unable to comment further It is noted that Bassetlaw District Council has made comment in its Statement of Common Ground on land use and agriculture.</p>	Not applicable

		<p>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>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>		
NCC 25	Landscape and Visual Amenity	<p>ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064] sets out the landscape and visual assessment has been undertaken in line with the appropriate guidance. The study area, and ZTVs, assessment viewpoints and visualisations have been considered appropriately, and proportionately.</p> <p>The primary mitigation adopted in relation to landscape and visual matters is embedded within the design of the Proposed Development and comprises the consideration given to</p>	<p>NCC consider that the Steeples Renewables Project would result in Significant adverse landscape and visual effects by reason of its mass, scale, and extensive land-use change from an open agricultural landscape to a landscape characterised by energy infrastructure.</p> <p>Residual significant adverse landscape and visual effects are expected to remain, with additional concern regarding cumulative change across the region. Any DCO should therefore</p>	Not agreed

		<p>avoiding and minimising landscape and visual effects during the evolution of the Proposed Development layout. This is sometimes referred to as ‘mitigation by design’. In addition, a series of landscape mitigation and enhancement measures are proposed to be included as part of the Proposed Development, including planting of new hedgerows, trees, woodland and species rich grassland. The measures are set out on ES Figure 6.9 Landscape and Ecological Mitigation Strategy [APP-160].</p> <p>Requirement 6 (LEMP) of the dDCO [REP5-005] secures further Landscape Ecology Management Plan details.</p> <p>With regard to the ‘key areas of disagreement’ set out by NCC, each of these matters has been addressed by the applicant within their submissions to the Examination. In particular within Applicant response to NCC Local Impact Report [REP2-050] (sections 5.4.1 – 5.4.12).</p> <p>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. During this meeting an extension to the period for replacement planting in the case of a force majeure event was discussed and updates suggested to the oLEMP to reflect this. However, following further consideration after this meeting, it is the Applicant’s position that the mitigation measures provided within the</p>	<p>secure robust landscape mitigation, long-term management (minimum 15 years), and post-establishment monitoring. While acknowledging that the LVIA has been undertaken broadly in accordance with GLVIA3, AAH have carried out a detailed review of the landscape and visual elements of the submission (October 2025) identifying concerns with methodology, significance judgements, and potential over-reliance on mitigation planting. Key areas of disagreement are:</p> <ul style="list-style-type: none"> ▪ Disagreement with beneficial effects claimed for landscape features (hedgerows, ‘ground cover’) (AAH LVIA Review para. 4.18–4.23). ▪ Year 1 planting cannot provide beneficial effects; would likely be neutral at best (AAH LVIA Review para. 4.19–4.20). ▪ Inconsistent treatment of moderate effects as not significant, which we disagree with (AAH LVIA Review para. 4.27). • reliance on successful establishment of mitigation planting • Residential Visual Amenity Assessment: No residents identified as experiencing significant effects, which is considered unlikely given proximity (AAH LVIA Review para. 6.16-6.17); and likely underestimation of Year 1 and Year 15 effects where mitigation screens replace open rural views 	
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		<p>oLEMP are appropriate and therefore the oLEMP is not to be updated in this regard.</p>	<ul style="list-style-type: none"> No significant cumulative effects identified in LVIA, contrary to the number and extent of renewable energy projects and associated infrastructure in the region <p>NCCs landscape consultant advises that the Councils position does not require further revision, post the meeting held on March 5th. [There was originally reference to “woodland” within the first bullet point, but this has been already removed so does represents a change from our original position]. We have noted the applicant has modified the oELMP post the meeting held on the 5 March, but NCC considers that a commitment to 15 years landscape maintenance during establishment followed by regular monitoring and replacement of landscaping until decommissioning. This position has been described in our response to ExA Q2 (Q13.0.3) related to landscape maintenance and submitted on March 24th. Otherwise, the assessment outcomes which rely on the successful establishment of mitigation planting cannot be guaranteed.</p>	
NCC 26	Glint and Glare	<p>ES Chapter 16: Glint and Glare [APP-073] considers glint and glare impacts of the Proposed Development.</p> <p>The possible glint and glare impacts of the Proposed Development upon road safety, residential amenity, railway infrastructure and operations, aviation activity, public rights of way, bridleways and waterways have been assessed.</p>	NCC notes the applicant’s position and has no further comment.	Agreed

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		<p>No significant impacts upon railway infrastructure and operations are predicted.</p> <p>The iterative design of the Proposed Development has considered what mitigation is to be implemented for the relevant receptors outlined, for example the appropriate management of existing and new planting within the Order Limits to minimise the potential for significant effects and ensure a satisfactory level of environmental protection. The landscape management measures are secured in ES Appendix 7.14 – outline Landscape Ecology Management Plan (oLEMP) [APP-116]. Following its implementation, no significant impacts upon the receptors are predicted.</p> <p>Requirement 6 (LEMP) of the dDCO [REP5-005] secures further Landscape Ecology Management Plan details.</p>		
NCC 27	Employment	<p>ES Appendix 10.1 Outline Supply Chain, Employment and Skills Plan [REP2-038] has been produced to optimise the number of local people who will have access to employment and training opportunities arising from the Proposed Development and is secured by Requirement 22 in the dDCO [REP5-005]. The Applicant has included a provision to include further detail on an apprenticeship scheme amongst other initiatives.</p>	NCC notes the applicant’s position and has no further comment.	Agreed
NCC 28	Traffic and	<p>A total of 26 access points will be used for the construction phase with details provided in ES Chapter 13: Transport and</p>	The Local Highway Authority (LHA) has provided detailed comments to the Pegasus Group about the Transport	Not agreed

	<p>Transport</p>	<p>Access [APP-071]. No.2 of the accesses will serve primary construction compounds and No.3 will serve the secondary construction compounds. The remaining No.21 access points will serve the dedicated haul routes and No.5 construction accesses will be used during operation.</p> <p>The impact of vehicle movements generated by the Proposed Development in terms of severance; driver delay; pedestrian delay; pedestrian and cyclist amenity; fear and intimidation; accidents and safety; abnormal and hazardous loads have also been considered. In summary no significant Transport and Access impacts will occur because of the proposed development.</p> <p>Requirements 7 (CEMP), 9 (OEMP), and 21 (Decommissioning and Restoration) of the dDCO [REP5-005] secure additional transport and access details from all phases of development.</p> <p>In total there are 25 Public Rights of Way ('PRoWs') that traverse or abut the Order Limits, which are set out in Table 13.7 of ES Chapter 13: Transport and Access [APP-071]. PRoWs within the Order Limits will remain open for the duration of construction period and diversions are not proposed unless required for short durations to protect public health and safety.</p> <p>Existing PRoWs will remain open during the operational phase of the Proposed Development and two new permissive paths will be created to improve connectivity within the Site, as well</p>	<p>Assessment (TA), Outline Construction Traffic Management Plan (OCTMP) & draft Development Consent Order (DCO) The LHA has been working with the representing Transport Consultant since April 24 and last met with the consultants on Tuesday 10 February and Tuesday 31 March. Some baseline positions and assessment methodologies have been agreed to continue the transport impact analysis process; But the final assessments, impact outcomes and proposed mitigation to protect public safety and limit construction related disruption are not fully agreed.</p> <p>The highway authority notes the applicant's response to the transport matters in the Councils Local Impact Report and the applicants additional traffic data submitted at deadline 2 but cannot establish that this latter document has dealt with the points raised previously. It has also considered the Transport Note submitted at deadline 5 produced at the request of National Highways. The defined route from the A1 to the site for construction traffic using the strategic road network and main road network links is agreed in principle by LHA. But the LHA has identified specific queries concerning the proposed 20 Nr field accesses/crossovers points/new entrances for the overland haulage routes that affect adopted public highway which do not appear to have been responded to. The County Council notes that the applicant wishes to provide these details as part of the DCO process through the oCTMP</p>	
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		<p>as active travel through the promotion of pedestrian and cycle access. These enhancements are set out in ES Appendix 7.14 outline Landscape Ecology Management Plan (oLEMP) [APP-161].</p> <p>Requirements 6 (LEMP), 13 (public rights of way diversion) and 18 (permissive paths) of the dDCO [REP5-005] secures further landscape ecology management plan; public rights of way management plan and permissive path details.</p> <p>Draft Addendum docs were submitted at Deadline 2 8.17 Applicant's additional traffic and PRow survey data submitted at Deadline 2 (Revision 1) [REP2-058].</p> <p>Please see NCC 4 regarding the method to secure the proposed detailed access design through the DCO process (as set out in paragraphs 4.51 to 4.56 pages 18 and 19 of the oCTMP [REP5-035]).</p>	<p>The County Council has requested that levels of traffic and associated impacts (and therefore the proposals for mitigation in the oCTMP) are confirmed by means of appropriate traffic impact assessments to evidence the claims regarding low level of impact. No amendments appear to have been made to the original TA, despite the concerns the HA conveyed in Oct 25. In the opinion of the highway authority, the applicant has not provided evidence-based information to justify their case.</p>	
NCC 29	Flood Risk	<p>A summary of flood risk from all sources is contained within ES Chapter 8 - Hydrology, Hydrogeology, Flood Risk and Drainage [REP2-018], Flood Risk Assessment [REP5-009] and Flood Risk Sequential Assessment and Exception Test [APP-186 to APP-189] that confirm the Site is at risk from both fluvial (low-medium) and surface water (very low-medium) flooding sources. However, mitigation measures have been proposed to ensure the Proposed Development will be safe without increasing flood risk elsewhere. Whilst some alternative sites</p>	<p>Based on the information given it appears that the sequential test has been satisfied.</p>	Agreed

		<p>may perform better in terms of flood risk (fluvial sources), no alternative site is without some flood risk, when all sources are considered. However, the DCO site is more sequentially preferable in wider sustainable development terms, as it is not affected by heritage constraints, habitat, ecology and landscape constraints to the same degree as the alternative sites assessed are.</p> <p>Therefore, as there are no available sequentially preferable sites that are of sufficient size to accommodate the whole Proposed Development, the Proposed Development satisfies the Sequential Test.</p>		
NCC 30	Surface and foul water drainage strategy	<p>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 [REP5-031] detailing appropriate use of a Sustainable Drainage System on site.</p> <p>Whilst not required to make the development acceptable, two large detention basins have been strategically placed within the Site on land to the west (up-gradient) of Sturton-le-Steeple. Their locations and sizes have been carefully designed to intercept overland flows, with water held in the basins before being released at a controlled rate to the existing drainage ditches after the peak of the rainfall event. The two basins combined would provide an attenuation capacity of</p>	<p>NCC notes the Applicants position and confirms that further discussions took place with the applicants drainage consultant on 11 February 2026</p> <p>It is agreed that there are no issues that need resolving, the level of detail provided is sufficient and the applicant has agreed to work further with the County Council as LLFA during detailed design (post consent).</p> <p>NCC has no concerns about the applicant’s ability to deliver a proposal which manages surface water to the expectation of the County Council as Lead Local Flood Authority.</p>	Agreed

		<p>approximately 4300m³ to help reduce the flooding issue reported by the residents. As it is a grassland area infiltration and evapotranspiration are likely to occur.</p> <p>Table 3.4 of the Outline Construction Environmental Management Plan (oCEMP) [REP5-019] sets out during construction foul water from any Site compound (including temporary toilets) will be taken away by tanker to an appropriate disposal facility by a licensed waste disposal contractor.</p> <p>Table 1 of the Consents and Agreements Position Statements [REP1-006] sets out at ref 3 if water discharge activities are required then an application for water discharge activity environmental permit will be made by the contractor before water is discharged.</p> <p>This position is also made clear in Part 4 Article 14 of the dDCO [REP5-005].</p> <p>Requirement 16 (surface and foul water drainage) of the dDCO [REP5-005] secures additional surface water drainage details.</p>		
NCC 31	Planning policy compliance	<p>Section 4 to 7, Appendix C (National) and Appendix D (Local) of the Planning Statement [REP2-040] and ES Chapter 5: Planning Policy [APP-063] set out how the Proposed Development complies with relevant local and national planning policy.</p>	NCC confirm the policies set out are relevant.	Agreed

Table 3 – Local Policies Considered Relevant

Policy Reference	Policy Topic	NCC LIR
Bassetlaw Local Plan (2020-2038)		
Policy ST1	Bassetlaw’s Spatial Strategy	
Policy ST33	Design Quality	
Policy ST35	Landscape Character	
Policy ST37	Green and Blue Infrastructure	
Policy ST38	Biodiversity and Geodiversity	
Policy ST39	Trees, Woodland and Hedgerows	
Policy ST40	Historic Environment	
Policy ST41	Designated and Non-Designated Heritage Assets	
Policy ST42	Promoting Healthy, Active Lifestyles	
Policy ST46	Protecting Amenity	
Policy ST47	Contaminated and Unstable Land	
Policy ST48	Reducing Carbon Emissions, Climate Change Mitigation and Adaptation	
Policy ST49	Renewable Energy Generation	

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Policy ST50	Flood Risk and Drainage	
Policy ST51	Protecting Water Quality and Management	
Policy ST52	Transport Infrastructure	
Policy ST53	Promoting Sustainable Transport and Active Travel	
Nottinghamshire and Nottingham Waste Local Plan (Adopted September 2025)		
SP1	Waste Prevention and Re-use	
SP8	Safeguarding and Waste Management Sites	
Nottinghamshire Minerals Local Plan (adopted March 2021)		
S04	Safeguarding Mineral Resources, permitted mineral reserves and associated minerals infrastructure	
SP7	Mineral Safeguarding, Consultation Areas and Associated Minerals Infrastructure	
MP2	Sand and Gravel Provision	

MP2c	Sturton-le-Steeple quarry identified as an permitted sand and gravel quarry with existing reserves	
Sturton Ward Neighbourhood Plan (SWNP) (2021-2037)		
Policy 1	Sustainable development, infill and the development boundary (part 2)	
Policy 2a	Protecting the landscape character, significant green gaps and key views	
Policy 2b	Enhancing biodiversity	
Policy 4	Reducing the risk of flooding	
Policy 5	Design principles	
Policy 6	Protecting the historic environment	
Clarbrough Neighbourhood Plan (CNP) (2016-2031)		
Policy 5	Reducing the Risk of Flooding	
Policy 6	Improve Green Infrastructure and the Natural Environment	

Table 4 – Outline Management Plans

Outline Plan	NCC's position
Outline Construction Environmental Management Plan	Agreed
Outline Decommissioning Plan	NCC notes the Applicants position but has not independently assessed this aspect of the application so has no further comment.
BESS Outline Fire Risk Management Plan	NCC notes the applicants position but has not independently assessed this aspect of the application so has no further comment.
Outline Operational Management Plan	NCC notes the applicants position but has not independently assessed this aspect of the application so has no further comment.
Outline Landscape and Environmental Management Plan	Under Discussion
Outline Written Scheme of Investigation for Pre-Determination Trial Trenching	Under discussion
Outline Written Scheme of Investigation for Archaeological Works	Under discussion
Outline Supply Chain, Employment and Skills Plan	Agreed.

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Outline Construction Traffic Management Plan	Agreed
Outline Soil Management Plan	NCC notes the applicants position but has not independently assessed this aspect of the application so has no further comment.

A1 Record of Engagement

Date	Method of Engagement	Purpose/Description
15/11/2023	Email to Nottinghamshire County Council	Email introducing the proposals and request to be put in touch with the planning team
17/11/2023	Email from Nottinghamshire County Council	Email looping the project team in with the County Planning Team
20/11/2023	Email to Nottinghamshire County Council	Email requesting a meeting with the Planning Team
23/10/2023	Email to Nottinghamshire County Council	Email to Nottinghamshire County Council informing them of the launch of early informal consultation.
15/12/2023	Email to Nottinghamshire County Council	Consultation close email
16/01/2024	Meeting	Introductory meeting with Nottinghamshire County Council
19/01/2024	Email to Nottinghamshire County Council	Meeting follow up
01/02/2024	Email to Nottinghamshire County Council	Email requesting set up of a PPA
16/02/2024	Email from Nottinghamshire County Council	Email providing PPA template and request for a meeting
21/02/2024	Email to Nottinghamshire County Council	Liaison over PPA meeting
21/02/2024	Email from Nottinghamshire County Council	Liaison over PPA meeting
21/02/2024	Email to Nottinghamshire County Council	Liaison over PPA meeting
04/03/2024	Meeting	PPA Meeting
11/03/2024	Email to Nottinghamshire County Council	Early informal consultation report
18/03/2024	Email to Nottinghamshire County Council	Draft SoCC issue
26/03/2024	Email to Nottinghamshire County Council	Chaser on PPA and Draft SoCC comments
04/04/2024	Email to Nottinghamshire County Council	Chaser on Draft SoCC comments
09/04/2024	Email to Nottinghamshire County Council	Confirmation on the status of the PPA
11/04/2024	Email to Nottinghamshire County Council	Sharing of Draft PPA
26/04/2024	Email to Nottinghamshire County Council	Chaser on PPA and Draft SoCC comments

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05/06/2024	Email from Nottinghamshire County Council	Sharing of amends to PPA
06/06/2024	Email to Nottinghamshire County Council	Confirming receipt of PPA amends and liaison over Steering Group meeting with Bassetlaw District Council
06/06/2024	Email from Nottinghamshire County Council	Liaison over Steering Group meeting with Bassetlaw District Council
07/06/2024	Email to Nottinghamshire County Council	Liaison over Steering Group meeting with Bassetlaw District Council
11/06/2024	Email from Nottinghamshire County Council	Liaison over Steering Group meeting with Bassetlaw District Council
11/06/2024	Email to Nottinghamshire County Council	Liaison over Steering Group meeting with Bassetlaw District Council
12/06/2024	Email to Nottinghamshire County Council	Query on the PPA
12/06/2024	Email from Nottinghamshire County Council	Response to a query on the PPA
24/06/2024	Email to Nottinghamshire County Council	Liaison over Steering Group meeting with Bassetlaw District Council
05/07/2024	Email from Nottinghamshire County Council	Finalisation of the PPA
16/07/2024	Email to Nottinghamshire County Council	Sharing final PPA for signature
16/07/2024	Meeting	Steering group meeting with Bassetlaw District Council
22/07/2024	Email to Nottinghamshire County Council	Sharing of meeting minutes from Steering meeting
26/07/2024	Email from Nottinghamshire County Council	Confirmation of no comments on the SoCC and sharing officer contact details.
06/11/2024	Email to Nottinghamshire County Council	Email Sharing Draft SoCC
11/11/2024	Email to Nottinghamshire County Council	Email chasing confirmation of receipt of Draft SoCC
11/11/2024	Email from Nottinghamshire County Council	Email confirming receipt of Draft SoCC
02/12/2024	Email to Nottinghamshire County Council	Email chasing comments on the draft SoCC
02/12/2024	Email from Nottinghamshire County Council	Email providing comments on the Draft SoCC
06/12/2024	Email to Nottinghamshire County Council	Email confirming receipt of comments on the Draft SoCC
15/012025	Email to Nottinghamshire County Council	Sharing consultation materials
15/012025	Email to Nottinghamshire County Council	Sharing consultation materials
17/01/2025	Email to Nottinghamshire County Council	Final SoCC Issue
20/01/2025	Email to Nottinghamshire County Council	S42 Notification

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22/01/2025	Email to Nottinghamshire County Council	Email confirming they are happy with the final SoCC
22/01/2025	Email to Nottinghamshire County Council	Confirming PEIR issue and proposed solution
29/01/2025	Email to Nottinghamshire County Council	Email requesting contact for the highways team
30/01/2025	Email to Nottinghamshire County Council	Email requesting contact for the flooding team
31/01/2025	Email from Nottinghamshire County Council	Email providing alternative officer contacts
03/03/2025	Email from Nottinghamshire County Council	Statutory consultation response
03/03/2025	Email to Nottinghamshire County Council	Request for comments on AoCM
17/03/2025	Email from Nottinghamshire County Council	AoCM Response
23/06/2025	MS Team meeting	LPA PPA meeting
15/07/2025	Email to Nottinghamshire County Council	S56 Notification
13/08/2025	MS Team meeting	LPA PPA meeting
23/09/2025	MS Team meeting	LPA PPA meeting
11/11/2025	Email	Draft SoCG emailed to NCC
03/12/2025	Email	Chase comments SoCG
05/12/2025	Email from NCC	Confirmation of Case Officer who is responding on SoCG. Case Officer was on leave but hoped to respond the following week.
08/12/2025	Email	Thanked NCC for confirming Case Officer and looked forward to receiving SoCG the following week.
15/12/2025	Email from NCC	Comments from Ecology and Landscape via email (not on SoCG)
15/12/2025	Email	Asked NCC to place comments in the SoCG and comment on other parts
15/12/2025	Email from NCC	Case Officer confirmed she would speak to other officers and return the SoCG with comments
19/12/2025	Email from NCC	Email with comments in SoCG provided. Large sections had no comments at all.
19/12/2025	Email	Email to NCC thanked Case Officer for comments on ecology principal matters and asked when comment on the remainder of the SoCG would be provided.
12/01/2026	Email	Chased NCC for updates on the SoCG

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12/01/2026	Email from NCC	Confirmed comments on the SoCG by the end of the week
16/01/2026	Email from NCC	SoCG returned via email attachment with additional comments included.
16/01/2026	Email	Email to Case Officer clarifying why over half the principal matters in the SoCG had no comments from NCC and were left blank.
19/01/2026	Email from NCC	Email confirming comments from some officers were still awaited
19/01/2026	Email	Asked if the SoCG with additional comments could be returned signed by 20.01.2026 to submit at D3
20/01/2026	Email from NCC	SoCG returned via attachment to email but was unsigned
20/01/2026	Email	Asked Case Officer if a Signed SoCG could be returned via email by lunchtime on the 21.01.2026
21/01/2026	Email from NCC	Set out their position is for the SoCG to remain unsigned
30/01/2026	Email	Chasing outstanding comments on principle matters from NCC
06/02/2026	Email	Chasing outstanding comments on principle matters from NCC
09/02/2026	MS Team meeting	Heritage meeting to discuss Trial Trenching Report and principal heritage matters in the SoCG
10/02/2026	Email from NCC	Confirming no additional comments will be provided
10/02/2026	MS Team meeting	Discuss highway and transport principle matter in SoCG and additional highway information submitted by the Applicant at Deadline 2 and Deadline 3. NCC could not find this on the examination library and request links to these documents
10/02/2026	Email	Containing links to documents REP2-050, REP2-058 and REP3-039
11/02/2026	Email	Rev 2 SoCG emailed to NCC via attachment to email
16/02/2026	Email from Nottinghamshire County Council	Comments on Rev 2 SoCG provided via attachment to email with comments on two matters (ref NCC 12 and NCC15) confirmed to be provided the following day. Comment in the SoCG requested the Applicant updates Table 1 RAG to the updates provided by NCC in the Table 2 RAG.
17/02/2026	Email	Thanking NCC for the comments on the SoCG, requested comments on the two matters are received by the end of the day, confirmed the Applicant is willing to continue engagement with NCC on the SoCG and requested a meeting with NCC's landscape consultant

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17/02/2026	Email from Nottinghamshire County Council	Comments on the two matters (NCC 12 and NCC 15) provided and confirmed happy to arrange a meeting between NCC's landscape consultant and the Applicant's landscape consultant
18/02/2026	Email	Applicant returned the draft SoCG Rev 2 after updating the RAG in Table 1 to reflect the RAG in Table 2 following comments from NCC as requested by NCC. The record of engagement also update to confirm engagement since SoCG Rev 2 was provided to NCC.
18/02/2026	Email from Nottinghamshire County Council	Confirming agreement to the updated RAG in Table 1 and Record of Engagement Appendix A1 in the SoCG
24/02/2026	Email	Setting out details of the revised oCTMP and arrange dates for an MS Team meeting
24/02/2026	Email from Nottinghamshire County Council	Suggesting 06 th March for an MS Team meeting due to annual leave and set out matters to discuss at the meeting.
26/02/2026	Email	Accepting 06 th March meeting date and confirmed when a revised oCTMP would likely be ready for consideration.
05/03/2026	Email	Checking on meeting date
05/03/2026	MS Team meeting	Discuss landscape matters
06/03/2026	Email from Nottinghamshire County Council	Highway Officer was ill and request to rearrange the MS team meeting for 09.03.2026
06/03/2026	Email	09 th March meeting date accepted and draft revised oCTMP provided
09/03/2026	Email from Nottinghamshire County Council	Requested a tracked changed version of the draft revised oCTMP
09/03/2026	MS Team meeting	Discuss revisions to the outline CTMP
10/03/2026	Email	Thanked NCC for attending the meeting and draft revised oCTMP provided following comments provided by NCC verbally in the MS Team meeting
11/03/2026	Email from Nottinghamshire County Council	Comments on the revised drat oCTMP provided via email. Request permits.
12/03/2026	Email	Thanked NCC for their comments that would be considered.
13/03/2026	Email	Set out how highway works would be secured through the DCO through the application of the 1991 highway act set out in Article 9 of the dDCO.
16/03/2026	Email	Requesting further MS Team meeting
16/03/2026	Email	Suggested alternative wording to secure changes to landscape details in oLEMP and SoCG

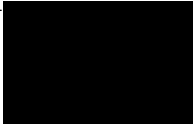
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17/03/2026	Email	Requesting further MS Team meeting
18/03/2026	Email from Nottinghamshire County Council	Apologised for the delay, confirmed highway officer was on leave but suggested 23.02.2026 for an MS Team meeting
20/03/2026	Email	Comments on draft amended wording SoCG regarding landscape and visual principle matter provided
23/03/2026	MS Team meeting	To discuss highway matters
24/03/2026	Email	Seeking comments on the revised draft oCTMP
24/03/2026	Email from Nottinghamshire County Council	Some comments on the revised draft oCTMP provided
24/03/2026	Email	Agreed to make changes in oCTMP as requested
24/03/2026	Email from Nottinghamshire County Council	Further comments on oCTMP provided (<i>too late to be considered on Deadline 5 submission day</i>)
25/03/2026	Email	Draft comments on the SoCG landscape and visual principal matters issued for consideration
27/03/2026	Email	Requesting a further MS Team meeting
30/03/2026	Email from Nottinghamshire County Council	Apologised for delayed response due to annual leave. Suggested 31/03/2026 for a further MS Team meeting
30/03/2026	Email	Agreed to an MS Team meeting on 31/03/2026
31/03/2026	MS Team meeting	To discuss highway matters
31/03/2026	Email	Email to NCC setting out additional highway information provided by the applicant during examination of the Steeple DCO
02/04/2026	Email from Nottinghamshire County Council	Comments on SoCG provided via attachment to email
07/04/2026	Email	Clean Rev 3 SoCG emailed to Nottinghamshire County Council for consideration
08/04/2026	Email from Nottinghamshire County Council	Signed Rev 3 SoCG returned 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:	April 8 th 2026
Signature:	

Duly signed and authorised on behalf of
Nottinghamshire County Council

Name:	
Job Title:	Director of Economy, Environment and Assets
Date:	April 8 th 2026
Signature:	