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# Steeple Renewables Project

**Applicant Response to Rule 17 Letter dated 02 April 2026**

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## Applicant Response to Rule 17 Letter dated 02 April 2026

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## 1 Introduction

- 1.1.1 This document provides Steeple Solar Farm Limited (the ‘Applicant’) response to the Examining Authorities (the ‘ExA’) Rule 17 Letter dated 02 April 2026 – Request for Further information – Applicant and Historic England **[PD-010]** relating to Biodiversity and Ecology (Skylark), Habitat Regulation Assessment, Historic Environment and Protective Provisions.
- 1.1.2 The Applicant has provided a tabularised response to the questions raised by the ExA within section 2 of this document.

## 2 Applicant Response to Rule 17 Letter dated 2<sup>nd</sup> April 2026

ID	ExA Question	Applicant Response
PD-010/1	<p><b>Biodiversity and Ecology - Skylark</b></p> <p><b>Applicant:</b> During issue specific hearing 2 agenda item 6, and as summarised in Written Summaries of Oral Submissions [REP4-031], it was stated that there is no policy requirement to provide like-for-like or 100% replacement for skylarks or other Section 41 species. Explain whether the proposed mitigation and compensation measures has fully applied the mitigation hierarchy in respect of avoiding, mitigating and compensating significant harm to skylark. If not, explain why not.</p> <p>In addition, the Planning Statement [REP2-040] (Appendix C page 117) states that there would be "no residual significant adverse effects on any species and habitats as a result of the Proposed Development". Yet chapter 7 of the Environmental Statement (ES) [REP3-009] concludes there would be residual significant effects (including cumulative) on skylark. Clarify whether there is a discrepancy between the documents. The applicant is also requested to review the accuracy of the figures in paragraph 6.5.29 and 6.5.30 of the Planning Statement which appear to differ from those quoted in the ES.</p>	<p><u>Skylark / Mitigation Hierarchy</u></p> <p>The mitigation hierarchy has been appropriately applied to impacts on the skylark population as set out below. In this regard we also note the following statement by Bassetlaw District Council at reference BDC3 on page 9 in their SoCG [REP3-047]:</p> <p><i>“Species groups have all been addressed individually, with priority given to protected and threatened species. Species that habitually rely on the current arable landscapes for their lifecycles, notably skylark for example, have been carefully considered and detailed mitigation and compensation has been designed into the scheme...”</i></p> <p><i>Avoidance</i> - By their nature skylarks have particular habitat requirements that include open fields which cannot be provided within the main body of the development apart from in a relatively small number of locations.</p> <p><i>Mitigation</i> - Mitigation includes retention of areas within the main solar farm development large enough to support skylark nesting. However, it is not possible to fully mitigate the loss of all potential territories within the body of the development.</p> <p>Other designed-in mitigation measures include the provision of retained field margins and swathes of grassland that will provide enhanced foraging opportunities for the local skylark population during the breeding season, as well as being managed to provide enhanced foraging for overwintering skylarks. This further mitigation will increase the survival of skylarks throughout the year, thereby reducing the impact on the species locally.</p>

*Compensation* - In the east and west biodiversity areas, land for compensation has been provided. Measures to increase the two areas' carrying capacity for skylark will further reduce the number of territories lost. Putting in place enhanced field margin foraging and "beetle banks" will provide increased local foraging during the breeding season as well as through winter. While numerically there is a small number of territories that will not be replaced, the provision of skylark plots and targeted skylark management will give increased opportunities for multiple broods within a season (meaning greater skylark productivity). Enhanced local foraging in the biodiversity areas will also increase productivity among the local skylark nesting population, as well as provide a year-round increase in foraging which will benefit the local population of skylark as a whole (not just during the breeding season). It should also be noted that targeted management for skylarks will be over an extended period of 40 years which provides long-term favourable conditions for the species.

A residual effect (as judged by loss of territory opportunity) will remain, but at a level of significance that is limited to the local level. Cumulative effects will remain at a level of significance that is limited to the local to district level.

Significance of Effects

The conclusion of Chapter 7 of the ES (7.12.19) [REP3-009] includes the following:

*"Residual effects on skylark of the Proposed Development are assessed as adverse and locally significant. Cumulative effects on skylark are assessed as adverse and significant at the Local to District level."*

The methodology employed for ecological impact assessment follows the Chartered Institute of Ecology and Environmental Management (CIEEM) publication Guidelines for Ecological Impact Assessment in the UK and Ireland (2018, version 1.3 updated 2024). This methodology recognises

		<p>that all effects have some level of significance, and this is described in a geographical context. The CIEEM guidance states:</p> <p><i>"A significant effect does not necessarily equate to an effect so severe that consent for the project should be refused planning permission. For example, many projects with significant adverse ecological effects can be lawfully permitted following EIA procedures".</i></p> <p>This is set out in ES Chapter 7 <b>[REP3-009]</b> at paragraphs 7.3.7 and 7.3.8.</p> <p>Appendix C on page 117 of the Planning Statement (document reference EN010163/EX/7.1 Rev 5) has been amended to reflect the geographical framing of the conclusions set out in the ES Chapter 7 (paragraph 5.4.45 ).</p> <p><u>Accuracy / Discrepancy of Figures between Planning Statement and ES</u></p> <p>In respect of paragraph 6.5.29, of the Planning Statement [EN010163/EX/7.1 Rev 5], the values given have been amended to reflect the numbers in Chapter 7 of the Environmental Statement. Chapter 7 accords with the numbers in ES Appendix 7.13 Skylark Mitigation Strategy at paragraph 4.6 <b>[APP-115]</b>. In respect of paragraph 6.5.30 of the Planning Statement, the values have been amended. The values have also been amended in paragraph 7.8.113 of Chapter 7.</p>
<p>PD-010/2</p>	<p><b>Habitat Regulation Assessment</b></p> <p><b>Applicant:</b> In response to the ExA’s second written questions (ExQ2) Q5.0.2, an updated version of the Information to inform a Habitats Regulations Assessment was submitted <b>[REP5-011]</b>. However, figures 1 and 2 are missing. Please resubmit with the figures included.</p>	<p>A revised Information to Inform Habitat Regulation Assessment (Document Reference EN010163/EX/5.5 Rev 3) has been submitted at Deadline 6 that includes figures 1 and 2.</p>

<p>PD-010/3</p>	<p><b>Historic Environment</b></p> <p><b>Historic England:</b> The ExA did not receive a response to ExQ2 Q11.0.7, which sought comments on the relationship between Grade II* listed Church of St Peter and St Paul and the scheduled monument comprising the medieval settlement and open field system immediately south east of Low Farm.</p> <p>Provide a response to the question or explain whether you are satisfied with the applicant’s responses provided in examination library reference [REP4-031] (pages 24 and 25). Noting the time remaining in the examination, please also provide any comments to the applicant at the earliest opportunity to allow them the chance of reply. The ExA also requests that the final statement of common ground with the applicant clearly sets out Historic England’s final position.</p>	<p>The Applicant has continued engagement with Historic England regarding the SoCG since Deadline 5. The Applicant has not received any comments from Historic England regarding ExQ2 11.0.7 but has since received an updated SoCG (document reference EN010163/EX/8.51 Rev 3) that has been signed and submitted at Deadline 6.</p>
<p>PD-010/4</p>	<p><b>Protective Provisions</b></p> <p><b>Applicant:</b> In response to ExQ2 Q9.4.1, it is stated that Section 127/138 Report [REP5-053] sets out the status of and outstanding points of disagreement within each of the protective provisions. Whilst the ExA notes the content of this document, to aid the ExA’s consideration of any outstanding areas of disagreement, ExQ2 Q9.4.1 specifically requested a table setting out the specific wording for each party that is subject to disagreement, the wording that the objecting party</p>	<p>The Applicant acknowledges the ExA’s request for a table setting out the outstanding areas of disagreement between the respective statutory undertakers. This table has been provided by way of an appendix to the revised Section 127/138 Report submitted at Deadline 6 (Document Reference EN010163/EX/8.54).</p>

	<p>is seeking and each party's position for the wording requested. It does not appear this has been provided. Provide this table at <b>deadline 6</b>.</p>	
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