

STEEPLE RENEWABLES PROJECT – EN010163

Representation from North Leverton with Hablesthorpe Parish Council

Dear Secretary of State,

North Leverton with Hablesthorpe Parish Council writes regarding the forthcoming decision on the Steeple Renewables Project.

Our concern is simple but significant: this development is being considered in an area already facing an exceptional concentration of major infrastructure projects, yet the cumulative effect on this community has still not been properly understood as a whole.

This is not a theoretical planning concern. It is about the combined impact on people's homes, roads, farmland, landscape, health and daily lives.

The Parish Council has consistently raised concerns about landscape harm, the loss of productive agricultural land, water and drainage risks, construction traffic, health and wellbeing, design uncertainty and the long term industrialisation of a rural area.

Many of those concerns have been responded to during consultation and examination.

That does not mean they have been resolved.

In several areas, the project has evolved significantly, important details have remained uncertain, and conclusions continue to rely upon future mitigation, management plans or assumptions which need to be tested against the final development that would actually be built.

Most importantly, Steeple Renewables cannot sensibly be judged in isolation from STEP at West Burton, National Grid's North Humber to High Marnham proposals, the redevelopment of West Burton and the other major projects affecting this area.

The Parish Council has previously identified more than 14 major developments affecting the parish, including multiple Nationally Significant Infrastructure Projects.

The question for Government is therefore not simply whether Steeple Renewables can be made acceptable on its own.

It is whether the combined burden being placed upon one relatively small rural community is acceptable at all.

The cumulative impact upon our community

This remains our overriding concern.

Steeple Renewables is not being proposed in isolation.

Our area is simultaneously facing the STEP fusion programme at West Burton, major National Grid infrastructure including North Humber to High Marnham, the consequences of the decommissioning and redevelopment of West Burton and numerous other significant developments.

Yet these projects continue largely to progress through separate planning and consenting processes.

That may satisfy individual procedural requirements, but it does not address the reality for this community.

Residents will experience the combined construction traffic, noise, road disruption, landscape change, loss of agricultural land, construction activity and industrialisation arising from all of these developments.

The timing matters too.

Questions have been raised throughout this process about assumed construction dates, and the duration of the Steeple Renewables build. The important issue is not simply when Steeple Renewables proposes to start and finish construction, but how those dates interact with the construction programmes for STEP, National Grid infrastructure and other major developments.

There needs to be a clear understanding of the worst case cumulative position where construction periods overlap.

It is difficult to understand how Government can make an informed decision about the acceptability of another nationally significant project without properly understanding the combined consequences of the nationally significant infrastructure being concentrated within virtually the same community.

Landscape character, the Ward Plan and residential impact

The Parish Council remains concerned that the development will fundamentally alter the landscape character of the ward and conflict with the objectives of the Ward Plan.

This is not simply an objection to seeing solar panels.

The existing open rural character of the landscape is itself important.

The Applicant relies substantially upon hedgerows and planting to reduce visual effects. However, vegetation does not necessarily screen the panels completely and, more fundamentally, surrounding industrial infrastructure with substantial screening vegetation does not preserve the existing landscape.

Replacing an open rural view with high hedgerows designed to conceal solar infrastructure is itself a material alteration to landscape character.

The Parish Council therefore does not accept that screening automatically equates to successful mitigation.

There is also the more immediate issue of properties from which significant visual effects may occur. These are people's homes. The effect upon those properties needs to be understood and appropriately addressed before consent is granted, rather than relying upon vegetation which may take many years to mature.

Site selection and the adequacy of the original evidence

The Parish Council also raised concerns about the original site selection process and the relatively limited January to March 2024 period upon which elements of that work were based.

For a development that could occupy this landscape for more than four decades, the robustness of the evidence used to determine where that development should be located is fundamental.

If subsequent work has supplemented or superseded that original evidence, Government should be satisfied that the final site selection case is based upon a sufficiently comprehensive evidence base rather than simply accepting that the original concern has been overtaken by the volume of documentation subsequently produced.

How defined is the development being consented?

Throughout the process, significant elements of the development have either evolved or lacked the level of detail the Parish Council would expect before a project of this scale receives consent.

Questions have included the final number and configuration of solar panels and modules and detailed cable routing.

The most striking example of evolving design is the maximum height of the main substation.

Earlier information referred to a maximum height of 2.4 metres above ground level. This subsequently became 11 metres.

That is not a minor refinement. It is a substantial change in a major piece of infrastructure.

The concern is therefore wider than whether the substation could change again. It raises the question of whether the community was originally consulted upon a sufficiently defined scheme.

The same principle applies to panel configuration and underground cabling.

Where the precise cable route or configuration has not been known at particular stages, it is difficult to understand how firm conclusions can simultaneously be reached about community impact or the absence of a need for particular mitigation.

The Secretary of State should be satisfied that the development now being considered is sufficiently defined and that conclusions reached earlier in the process remain valid against the final secured design, rather than against assumptions which may subsequently have changed.

Drinking water, groundwater and contamination

The eastern part of the site includes land within a drinking water protected area.

This has always been a particularly serious concern for the Parish Council.

Project documentation has acknowledged the potential for hazardous materials or chemicals associated with construction to reach the ground, watercourses or underlying aquifers.

Terms such as effects being “temporary”, “direct” or “of local importance” do little to reassure the people who may ultimately experience the consequences if mitigation fails.

A temporary pollution event can still have serious consequences.

A local effect matters enormously when you are the community in which that local effect occurs.

For a development affecting agricultural land, watercourses, groundwater and a drinking water protected area, reliance upon good practice and future management arrangements is not sufficient unless those measures are specific, robust, enforceable and monitored.

The Parish Council is seeking firm safeguards, not simply predictions that significant consequences are unlikely.

Flood risk and land drainage

The Parish Council originally questioned the reliance placed upon observations of secondary and tertiary watercourses made during dry conditions.

Further flood modelling and drainage work has subsequently been undertaken, which we acknowledge.

However, that does not make the wider drainage concern disappear.

The development will change the use and physical characteristics of a substantial area of agricultural land for decades. There has also been referenced to affected land drainage being restored at the end of the project.

If that means restoration after an operational period of approximately 42 years, it cannot reasonably be treated as an adequate answer to drainage impacts occurring throughout those intervening decades.

Government should be satisfied not merely that drainage can eventually be reinstated, but that agricultural drainage, surface water and flood risk will be properly managed throughout construction, operation and decommissioning, including when considered alongside the other major infrastructure works taking place across the area.

Agricultural land and grazing

Approximately 72.1% of the land within the Order Limits is Best and Most Versatile agricultural land.

This is productive farmland.

The argument that the land may eventually be restored does not address the loss of its existing productive use for decades.

Similarly, the suggestion that sheep can graze beneath or amongst the solar infrastructure does not, by itself, demonstrate that the land remains meaningfully equivalent to its current agricultural use.

Farmers locally have raised practical concerns regarding grazing and animal safety around solar infrastructure.

If grazing is relied upon as justification for saying that the land remains in agricultural use, there should be clear evidence demonstrating how it will work safely and economically on this particular development, what proportion of the land can genuinely be grazed, and what agricultural productivity will actually be retained.

Sheep grazing should not become a convenient planning description which disguises the loss of productive agricultural land.

Construction impacts – “temporary” does not mean insignificant

A recurring concern throughout the documentation has been the description of construction effects as “temporary” or “limited”.

The Parish Council does not consider those words sufficient.

A construction impact can be temporary in planning terminology while lasting several years and having a very real effect upon the people living with it.

Similarly, describing an impact as local does not make it insignificant to the people who live locally.

This is particularly important when the effects include HGV traffic, noise, potential contamination, drainage disruption and landscape disturbance and when construction may overlap with other nationally significant projects.

The cumulative duration and intensity of disruption is what should be assessed.

Transport

The Parish Council originally raised concerns about traffic surveys undertaken between 24 June and 3 July 2024, a relatively short period during the summer.

Additional traffic work has subsequently been undertaken, which we acknowledge.

However, the fact that further surveys were considered necessary reinforces the importance of challenging whether the original baseline was sufficiently robust.

More importantly, the issue has now moved beyond the traffic generated by Steeple Renewables alone.

Government needs to understand what local roads will actually experience when construction traffic from Steeple Renewables, STEP, National Grid and other developments overlaps.

Assessing each project individually risks producing a series of individually “acceptable” traffic impacts which collectively become completely unacceptable.

Local jobs and claimed economic benefits

The Parish Council also remains unconvinced by the socio-economic case presented for the development.

Construction jobs are temporary. Once operational, a solar development requires comparatively limited ongoing intervention.

Claims concerning supply chain opportunities, business rates, reinvestment or wider benefits to Bassetlaw therefore need to be distinguished carefully between what will happen and what might happen.

Potential benefits should not be given the same weight as secured commitments.

If economic and community benefits are being used to justify the harm caused by the development, those benefits should be demonstrable, measurable and, wherever possible, enforceable.

They should not simply operate as an attractive counterweight to very real and long lasting local impacts.

Ecology and mitigation

The Parish Council acknowledges that further ecological information and mitigation have been provided during the process.

For example, concerns were originally raised following evidence of barn owl activity and the identification of trees capable of supporting nesting owls. Subsequent information indicates that suitable trees are to be retained and protected and that appropriate ecological checks will be undertaken.

We welcome that clarification.

However, it illustrates an important wider point.

Where conclusions of no significant adverse ecological effect depend upon mitigation, it is the effectiveness, longevity, monitoring and enforceability of that mitigation that matters.

The Secretary of State should therefore be satisfied that ecological conclusions depend upon measures which are properly secured and delivered, rather than simply upon commitments contained within assessments.

Glint, glare and aviation safety

The Parish Council remains concerned about aviation implications.

The wider area includes aviation activity associated with RAF Waddington, RAF Coningsby, Gamston Airport and Sandtoft, together with the prospective reopening of Doncaster Sheffield Airport.

Further glint and glare assessment has been undertaken, but where assessments acknowledge the potential for temporary after image effects, the Parish Council believes Government should require robust assurance that aviation safety is protected.

“Temporary” is not a reassuring description where the potential effect involves a pilot’s vision.

The consequence of an aviation incident would clearly extend far beyond the aircraft itself.

This is an area where the precautionary approach should carry considerable weight.

Underground cabling and electromagnetic fields

The Parish Council has previously questioned conclusions that no particular EMF mitigation is necessary where detailed cable routing and configuration were not fully established.

The principle is straightforward.

If a conclusion depends upon the location, length, depth or configuration of cabling, that conclusion must be demonstrated against the actual design that will be built.

The Secretary of State should therefore be satisfied that EMF assessments and conclusions remain valid against the final secured cable arrangements and that appropriate mitigation can be required should detailed design alter the assumptions upon which earlier conclusions were based.

Health and wellbeing

The effect of this unprecedented concentration of development upon residents cannot be reduced to individual technical assessments.

The Parish Council has already identified concerns including loss of countryside, anxiety associated with continuing industrialisation, information overload, consultation fatigue and pressure upon farming livelihoods.

Residents and volunteer parish councillors are attempting to understand and respond to multiple highly technical major infrastructure projects simultaneously.

That has a human impact.

Health and wellbeing cannot reasonably be considered solely project by project when the source of the pressure is cumulative.

The burden of consultation

Perhaps one of the clearest indications of the problem is the extraordinary burden this process places upon small communities.

Residents and unpaid parish councillors have been expected to navigate enormous volumes of technical documentation, cross reference assessments and management plans, understand evolving designs, participate in multiple consultations and repeatedly pursue answers to matters directly affecting their homes, livelihoods and community.

Too often a concern appears to be considered “addressed” because an Applicant has provided a response or pointed towards another technical document.

Being responded to is not the same as being resolved.

The production of more documentation should not itself be regarded as evidence that meaningful consultation has occurred.

A planning system should enable communities to participate meaningfully. It should not be so complicated and resource intensive that there is a risk of exhausting them into submission.

Renewable energy is not the issue

North Leverton with Hablesthorpe Parish Council recognises the national need for clean energy and the importance of delivering national infrastructure.

Our objection should not be characterised as opposition to renewable energy.

Our community is already being asked to make an enormous contribution to national energy and infrastructure policy.

The question is one of proportionality and cumulative burden.

At what point does the concentration of nationally significant infrastructure within one relatively small rural community become too much?

At present, each individual consenting process appears capable of concluding that its own impacts can be managed, while nobody takes responsibility for determining whether their combined impact is acceptable.

That is the fundamental issue we ask the Secretary of State to consider.

For ease of reference, we have set out below the principal concerns raised by the Parish Council, what has subsequently been said or done, and why we consider each matter either remains unresolved or requires further assurance.

APPENDIX 1 – OUTSTANDING MATTERS AT DETERMINATION

Steeple Renewables Project – EN010163

North Leverton with Habbleshthorpe Parish Council

The purpose of this appendix is to distinguish clearly between a concern having been responded to during consultation and examination and that concern having been satisfactorily resolved.

Issue originally raised	What has subsequently been said / done	Why the matter remains unresolved / requires assurance
1. Cumulative impact - STEP, National Grid and other major developments	Individual cumulative assessments have been undertaken, but STEP has not been fully incorporated into aspects of the cumulative assessment.	Residents experience these developments collectively. The combined effects of Steeple Renewables, STEP, North Humber to High Marnham and the other major developments must be understood, particularly where construction periods overlap.
2. Build dates, construction duration and overlapping projects	Construction programmes and assumptions have been developed for Steeple Renewables.	The important issue is how these dates interact with STEP, National Grid and other major construction programmes. A credible worst case assessment of overlapping construction is required.
3. Landscape character and conflict with the Ward Plan	Landscape effects have been assessed and planting and hedgerows proposed as mitigation.	The Parish Council considers the development harmful to the landscape character protected by the Ward Plan. Screening does not remove that conflict, and extensive screening vegetation itself changes the existing open rural character.
4. Hedgerow screening and effects upon properties	Hedgerows and other planting are relied upon to reduce visual effects over time.	Vegetation will not necessarily provide complete screening and may take years to mature. Significant effects upon individual homes must be addressed on their merits rather than assumed to disappear through future planting.
5. Site-selection evidence	Further project information and assessment have been produced since the original work.	The Parish Council originally questioned the adequacy of a site selection process relying upon work undertaken during January–March 2024. Government should be satisfied that the final site selection case is based upon a sufficiently comprehensive and robust evidence base.
6. Number and configuration of solar panels/modules	Design parameters have developed as the project has progressed.	Where the final number or configuration of panels and modules has not been fixed at earlier stages, this raises a wider issue of design certainty. Consent should contain sufficiently clear parameters to prevent material impacts changing after approval.
7. Underground cable route	Underground cabling and design principles have been developed further.	The community impact and environmental conclusions must be demonstrated against the final secured routing and design rather than assumptions made while routes remained uncertain.
8. Main substation height - 2.4m to 11m	The maximum main substation height subsequently became 11 metres AGL rather than the earlier 2.4 metres.	This is a substantial change, not a minor refinement. It raises legitimate questions about whether the community was originally consulted upon a sufficiently defined scheme and whether earlier assessments remain representative.
9. Drinking Water Protected Area	Construction controls and mitigation measures are proposed.	The eastern area includes land within a drinking water protected area. The community requires firm, specific and enforceable safeguards protecting drinking water rather than reliance principally upon good practice and future management.
10. Hazardous materials, watercourses and aquifers	Potential pollution pathways have been assessed and mitigation proposed.	Construction activities may release chemicals capable of entering soil, watercourses or underlying aquifers. Describing effects as “temporary”, “direct” or “local” does not make the consequences insignificant.

Issue originally raised	What has subsequently been said / done	Why the matter remains unresolved / requires assurance
11. Flood risk and dry weather observations	Further flood modelling and drainage assessment have subsequently been undertaken.	The additional work is acknowledged and means the original dry weather observation should not be considered in isolation. However, assurance is still required that flood and drainage risks are properly managed throughout the development's life and cumulatively with other infrastructure.
12. Land drainage and restoration after approximately 42 years	Existing drainage affected by development may ultimately be restored/reinstated.	Restoration at the end of an approximately 42 year project does not answer what happens during those intervening decades. Drainage needs to function safely and effectively throughout construction and operation.
13. Best and Most Versatile agricultural land	Approximately 72.1% of land within the Order Limits is BMV agricultural land. Eventual restoration and grazing are relied upon in considering agricultural effects.	The development removes or substantially changes productive agricultural use for decades. Eventual restoration does not compensate for that intervening loss.
14. Sheep grazing and animal safety	Sheep grazing is proposed as a means of retaining agricultural activity, with other vegetation management possible where required.	If grazing is relied upon as evidence that agricultural use continues, the Applicant should demonstrate its practicality, animal safety, economic viability, extent and actual retained productivity on this particular development.
15. Ecology and barn owls	Further ecological measures have been provided. Information subsequently indicates that suitable barn owl trees will be retained/protected and ecological checks undertaken.	The Parish Council acknowledges this development. The remaining issue is ensuring that ecological mitigation relied upon in reaching conclusions is secured, monitored and enforceable throughout the development.
16. Nature conservation conclusions and reliance upon mitigation	Conclusions of no significant adverse effects are reached after proposed mitigation is taken into account.	The relevant question is whether the mitigation upon which those conclusions depend is sufficiently detailed, deliverable, enforceable and monitored. A conclusion dependent upon mitigation is only as robust as the mitigation itself.
17. Original traffic surveys and subsequent evidence	The original June/July 2024 traffic work has subsequently been supplemented by further survey work.	The Parish Council acknowledges the additional evidence. The principal outstanding issue is now cumulative traffic: what will local roads actually experience when Steeple Renewables, STEP, National Grid and other construction traffic overlaps?
18. Construction impacts described as “temporary” or “limited”	Individual construction effects are assessed and management measures proposed.	Temporary does not mean insignificant. Several years of disruption can have serious consequences for residents, particularly where other projects are being constructed simultaneously. The real cumulative duration and intensity must be considered.
19. Temporary employment and limited operational jobs	Construction employment and supply chain opportunities are identified as benefits.	Construction jobs are temporary and the operational development requires relatively limited intervention. Government should distinguish between short term employment and sustainable long term benefit to the host community.
20. Business rates and wider economic benefits	Potential economic, supply chain and wider local benefits have been identified.	Potential benefits are not the same as guaranteed benefits. Where these claims are weighed against definite landscape, agricultural and community impacts, Government should establish which benefits are evidenced, measurable and secured.
21. Glint and glare / aviation	Further aviation and glint and glare assessment has been undertaken.	The local context includes RAF Waddington, RAF Coningsby, Gamston Airport and Sandtoft, together with the prospective reopening of Doncaster Sheffield Airport. Where temporary after image remains possible, robust aviation safety assurance is required.
22. Electromagnetic fields	EMF conclusions and cabling principles have been developed through the project documentation.	Conclusions about the absence of a need for mitigation must remain valid against the actual final cable route, length, depth and configuration. If those factors change, the mitigation assessment must remain capable of responding accordingly.
23. Health and wellbeing	Health effects and mitigation have been considered within project documentation.	The cumulative human effect of construction, traffic, landscape loss, continuing industrialisation, uncertainty and consultation fatigue cannot adequately be understood by examining Steeple Renewables in isolation.

Issue originally raised	What has subsequently been said / done	Why the matter remains unresolved / requires assurance
24. Consultation and accessibility of information	Extensive consultation has occurred and a very substantial volume of technical documentation has been produced.	Quantity is not the same as quality. Residents and volunteer councillors have faced an unreasonable burden in navigating changing and highly technical information, with questions frequently answered by reference to yet more documentation.
25. Overall cumulative burden upon the community	Each major project is progressing through its respective planning or consenting regime.	This is the fundamental problem. Individual projects may each be found acceptable within their own process while nobody determines whether their combined impact upon one relatively small community is acceptable.

What we are asking Government to consider

The Parish Council recognises that the Applicant has responded to many of the concerns raised during consultation and examination.

Our concern is that a response does not necessarily mean that the underlying issue has been resolved.

For this reason, before development consent is granted, we ask the Secretary of State to look carefully at whether the remaining risks and uncertainties have genuinely been addressed, particularly in relation to:

- the cumulative impact of Steeple Renewables alongside STEP, National Grid infrastructure and the other major developments affecting this area;
- overlapping construction periods and cumulative HGV movements;
- the effect on landscape character, the Ward Plan and nearby properties;
- the robustness of the site selection process and the level of design certainty;
- protection of drinking water, groundwater, aquifers and watercourses;
- flood risk and the long term effect on land drainage;
- the loss of productive Best and Most Versatile agricultural land;
- whether grazing can realistically maintain meaningful agricultural use;
- the true duration and cumulative effect of construction disruption;
- whether the claimed local economic benefits are firm, measurable and secured;
- whether ecological mitigation will be properly delivered and monitored;
- aviation safety;
- whether EMF conclusions remain valid against the final cable design; and
- the cumulative effect of all of this on the health and wellbeing of local residents.

Where mitigation is relied upon to make an impact acceptable, that mitigation should be clear, funded, enforceable and monitored.

Where important uncertainty remains, that should be given proper weight in the final decision.

Above all, we ask the Secretary of State to consider the position from the perspective of the people who actually live here.

Each individual project may be capable of producing an assessment which says its own impacts can be managed. The problem is that our community will not experience those projects individually.

We will experience all of them together.

That is why the question we continue to ask is a simple one:

How much nationally significant infrastructure can reasonably be concentrated within one relatively small rural community before the cumulative impact becomes unacceptable?

At present, we do not believe that question has been adequately answered.

Closing position

North Leverton with Hablethorpe Parish Council fully recognises the national importance of renewable energy and major infrastructure investment.

Our objection is not to renewable energy in principle.

Our objection is to the way in which the cumulative consequences for this community continue to be fragmented across separate projects, separate assessments and separate consenting processes.

The result is a situation in which each individual development may be presented as manageable, while the combined effect upon the people who live here, the roads they use, the landscape they value, the farmland that sustains local livelihoods and the environment they depend upon is never properly judged as a whole.

That is the point we ask the Secretary of State not to lose sight of.

After years of consultation and assessment, there are still important areas where the Parish Council does not believe sufficient certainty has been provided.

We therefore respectfully ask that development consent is not granted unless and until the Secretary of State is satisfied that the outstanding matters identified above have been properly addressed and that the cumulative impact of Steeple Renewables alongside STEP, National Grid infrastructure and the other major developments affecting this area has been fully understood.

Our community should not become the unintended casualty of a planning system which assesses projects individually while leaving residents to live with their combined consequences.

We would be grateful for confirmation that this representation has been received, will be placed before the Secretary of State and will be taken into account prior to determination of EN010163.

Yours faithfully,

 – Vice Chair

North Leverton with Habbleshorpe Parish Council