



Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Whitestone Solar Farm

Case Reference: EN0110020

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) to
Regulation 10 of The Infrastructure Planning (Environmental Impact
Assessment) Regulations 2017

03 June 2025

TABLE OF CONTENTS

1.	INTRODUCTION.....	1
2.	OVERARCHING COMMENTS.....	3
2.1	Description of the Proposed Development.....	3
2.2	EIA Methodology and Scope of Assessment	6
3.	ENVIRONMENTAL ASPECT COMMENTS.....	8
3.1	Biodiversity and Nature Conservation	8
3.2	Landscape and Visual.....	11
3.3	Cultural Heritage and Archaeology.....	16
3.4	Ground Conditions and Land Quality	18
3.5	Water Resources and Flood Risk	22
3.6	Climate Change and Greenhouse Gas Assessment	25
3.7	Air Quality.....	27
3.8	Traffic and Transport	28
3.9	Noise and Vibration	30
3.10	Socio-Economics, Land Use, Tourism and Recreation	32
3.11	Other Environmental Topics	34
3.12	Cumulative Effects	37
 APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED		
 APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES		

1. INTRODUCTION

- 1.0.1 On 23 April 2025, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Whitestone Net Zero Limited (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Whitestone Solar Farm (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.
- 1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:
- 1.0.3 <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110020-000003-EN0110020%20-%20Scoping%20Report%20-%20Main%20Report.pdf>
- 1.0.4 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.
- 1.0.5 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.6 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.7 The Inspectorate has published a series of advice pages, including '[Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.8 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

['Nationally Significant Infrastructure Projects: Advice pages'](#)

- 1.0.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Sections 3 to 5)

ID	Ref	Description	Inspectorate's comments
21.1	1.1.4 and 3.1.3	Size of the site	The size of the solar array areas is stated to be 1370 hectares in Scoping Report paragraph 1.1.4 however, the total area of the site including the cable corridor is not provided. The ES should provide the size of the site including the area to be used for the solar array, associated infrastructure and mitigation/ enhancements and extent of the cable corridors so that order limits are fully understood.
212	n/a	Study areas	The Inspectorate notes that some of the study areas presented in the Scoping Report have been determined in relation to the array areas only and do not account for impacts from the cable route corridors e.g. Biodiversity and Nature Conservation. The ES should present the study areas in relation to potential impacts for the whole of the development.
213	3.4.1	Cable corridors	The Inspectorate notes that the Scoping Report does not provide an overview of the key environmental constraints related to the cable corridors and potential impacts from construction, operation and decommissioning of the cable corridors are not considered in some of the aspect chapters throughout the ES e.g. cultural heritage. The ES should appropriately characterise the baseline environment of the cable corridors and their associated study areas and identify sensitive receptors, providing any agreement on the scope of surveys with consultees where relevant. An assessment of likely significant effects (LSE) from construction, operation and decommissioning of the cable corridors should be provided for the relevant aspect chapters in the ES, accompanied by appropriate figures.
214	3.5.6	Maximum heights of PV panels	The Inspectorate notes that the maximum height of the PV panel will be determined following further discussions with the Environment Agency (EA) in relation to flood levels.

ID	Ref	Description	Inspectorate's comments
			The applicant should also undertake consultation with other bodies in relation to potential impacts such as landscape and visual, where relevant.
215	3.5.7	Description of option for the PV modules	The Inspectorate notes that concrete ballast foundations may be used to support the PV modules in areas where ground penetration is unsuitable for steel poles. The ES should provide the location where concrete ballast foundations will be used and assess any associated effects where they are likely to be significant within the relevant aspect chapters.
216	3.5.13 to 3.5.19	Battery energy storage system (BESS)	The description of the physical characteristics and technical capacity of the BESS should be developed in the ES to include details such as battery technology type/ specification, location, dimensions and anticipated number of containerised battery units.
217	3.5.20 to 3.5.25	On-site cabling	The ES should describe the likely routeing, trench width and depth and working width for the underground cabling. The works required to install the cables should be described, including any dewatering of excavations and crossings.
218	3.5.35 to 3.5.36	Temporary construction compounds	The Scoping Report states that the proposed development would require temporary construction compounds, however the exact locations are yet to be determined. The ES should provide details regarding the number, location, access and dimensions of construction compounds. Any associated LSEs should be assessed in the ES.
219	3.6.5 to 3.6.6 and 3.6.16 to 3.6.18	Access routes	The ES should describe the proposed site entrance(s) and the routes to be used for all vehicular access during construction and operation of the proposed development and this information should be clearly presented on supporting plans within the ES. The ES should describe and assess the potential effects, where they are likely to be significant, associated with any improvements/ changes to the access routes which are either required to facilitate construction of the proposed development or are required for restoration purposes on completion of the works. For the assessment of effects during construction, the ES should explain how the proposed access route(s) relate to sensitive receptors.

ID	Ref	Description	Inspectorate's comments
21.10	3.6.12	Operational activities	The ES should describe the potential scope and duration of the operation and maintenance works of the proposed development, including predicted vehicle movements and staffing numbers. The proposals for ongoing management and maintenance of the land around and under the solar array should be confirmed in the ES, including any vegetation management and animal grazing. Any potential adverse effects of operation and maintenance activities should also be assessed in the ES where they are likely to be significant. Proposals for maintaining vegetation around easements and the Public Rights of Way (PRoW) within the application site should also be described.
21.11	4.4	Flexibility and the Rochdale Envelope	The Inspectorate notes the applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the proposed development. The Inspectorate expects that at the point an application is made, the description of the proposed development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the proposed development, supported by figures, or where details are not yet known, will set out the assumptions applied to the assessment in relation to these aspects. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross sections, and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 6)

ID	Ref	Description	Inspectorate's comments
221	6.6.7	Professional judgement	The ES should provide evidence to support conclusions or clearly identify where professional judgement has been relied upon to determine the level of significance of effects. Any use of professional judgement to assess significance should be fully justified within the ES.
222	n/a	Environment Agency data	The EA has published new flood and coastal erosion risk data in 2025 following the release of its "National assessment of flood and coastal erosion risk in England 2024". Further updates are also expected to follow. The applicant should ensure that assessments take account of updated data sets as these become available through Defra's Data Services Platform. Where relevant, the applicant is encouraged to liaise with the EA to determine the implications for project design and the scope of assessments.
223	n/a	Transboundary	The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or

ID	Ref	Description	Inspectorate's comments
			materially different information coming to light which may alter that decision. Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.0.7 above.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Biodiversity and Nature Conservation

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Table 7.3 and Appendix B	Protected species – white clawed crayfish, hazel dormouse – all phases	The Scoping Report proposes to scope out assessment of these species on the basis that they are not identified in the site or Area of Influence. The Inspectorate notes that Scoping Report paragraph 7.3.29 identifies a white clawed crayfish recorded in the study area from a desk based review and justification for scoping this species out is the 'likely' absence due to presence of invasive crayfish species. The study area and baseline supporting the scope of Biodiversity and Nature Conservation relates to the solar array area only (Please see IDs 2.1.2 and 2.1.3 of this Scoping Opinion) and therefore it is unknown whether these species are present in the study areas of the cable corridors. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.1.2	Table 7.3 and Appendix B	International statutory designated sites – all phases	This is scoped out on the basis that there are no European sites present within the red line boundary or area of influence. Scoping Report paragraph 7.3.20 identifies the nearest designated sites as the South Pennine Moors Special Area of Conservation (SAC) and Special Protection Area (SPA) which is located 17.5km southwest from the nearest point of the proposed development. Given the location of the proposed development, the Inspectorate agrees to scope this matter out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13	Table 7.3 and Appendix B	Protected habitats – ancient woodland – all phases	The Scoping Report proposes to scope out an assessment of ancient woodland on the basis none are present within the site and an avoidance buffer would be implemented from the proposed development to the nearest ancient woodland. The baseline presented in the ES appears to relate only to the solar array area (Please see IDs 2.1.2 and 2.1.3 of this Scoping Opinion). The baseline an study area for the cable corridors has not been provided. Moreover, the Inspectorate notes that Scoping Report Figure 3.5 identifies ancient woodland adjacent to the site boundary. The ES should provide an assessment of the potential effects of the proposed development on ancient woodland, veteran trees and other irreplaceable habitats located within an appropriate zone of influence relating to the entire site boundary or provide evidence to demonstrate the absence of LSE including agreement with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
3.14	7.3.21 and Table 7.1	National/ Local Statutory Designated Sites	Scoping Report Table 7.1 identifies designated sites located within the area of influence of the proposed development; however, the study area does not include area of cable connection corridor (Please see IDs 2.1.2 and 2.1.3 of this Scoping Opinion). The applicant should make efforts to agree the designated sites which should be included in the assessment with relevant consultee bodies.
3.15	n/a	Assessment of fish and aquatic ecology	The Inspectorate notes that habitat of rivers, watercourses and ponds are recorded within or adjacent to the site but there is no reference to whether assessment of fish or aquatic ecology (beyond otters and water voles) would be scoped in or out of the ES. The ES should present an assessment of effects on fish or aquatic ecology where they are likely to be significant, for all phases, or evidence to demonstrate the absence of LSE including agreement with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
3.16	n/a	Confidential Annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.2 Landscape and Visual

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Table 8.4 and Appendix B	Landscape subject to statutory landscape designation – all phases	The Scoping Report proposes to scope out statutory landscape designation as no National Parks or National Landscapes are located within or near to the site. The Inspectorate agrees that, in the absence of any nationally designated landscapes such as National Parks or National Landscapes within the vicinity of the proposed development, this matter can be scoped out.
322	Table 8.4 and Appendix B	Landscape subject to non-statutory/ local landscape designation – all phases	The Scoping Report proposes to scope this matter out on the basis that there are no local landscape designations within the site. Paragraph 8.3.29 states that there are number of local designations within the study area. No evidence has been provided to suggest that the proposed development will not have significant effects on non-statutory/ local landscape designations located within the study area. As such, the Inspectorate is currently not in a position to scope this matter out. The ES should assess any significant effects to non-statutory/ local landscape designations or provide evidence to demonstrate the absence of LSE including agreement with relevant consultation bodies.
323	Table 8.4 and Appendix B	Local landscape character areas outside of the study area	As the study area is determined to be the array areas only (Scoping Report Figure 8.1 and paragraphs 8.3.15 to 8.3.18; Please see IDs 2.1.2 and 2.1.3 of this Scoping Opinion), this does not take into consideration potential effects from the cable corridors and the associated study area. In the absence of the above information and any evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			matters, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
324	Table 8.4 and Appendix B	Visual receptors using Public Rights of Way within the site boundary during construction and decommissioning	The Inspectorate agrees to scope this matter out on the basis that PRowS which cross the site would be temporarily closed during the construction and decommissioning phases. However, impacts from the closure of these PRowS should be assessed in the relevant chapters of the ES.
325	Table 8.4 and Appendix B	Visual receptors: users of Public Rights of Way or other outdoor locations within the study area where the Zone of Theoretical Visibility (ZTV) demonstrates no visibility during construction, operation and decommissioning	The Inspectorate agrees that where the ZTV demonstrates no visibility with visual receptors during construction, operation and decommissioning that these receptors can be scoped out. However, the ZTV presented in the ES to support scoping out receptors with no visibility of the proposed development should be based on the development as a whole (including the cable corridors) and any evidence of agreement on the ZTV with consultees should be provided.
326	Table 8.4 and Appendix B	Visual receptors at public locations outside of the study area	The Inspectorate agrees that where visual receptors at public locations outside of the study area have no visibility of the proposed development (including long distance views), these matters may be scoped out of further assessment; the study area should be based on an appropriate ZTV of the development as a whole (Please see ID 2.1.2 and 2.1.3 of this Scoping Opinion in relation to appropriate study areas).
327	Table 8.4 and	Visual receptors: Workers in nearby	The Scoping Report proposes to scope out these receptors in the Landscape and Visual Impacts Assessment (LVIA) on the basis that workers are unlikely to be focused upon

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Appendix B	buildings and outdoor locations within the study area	views and any adverse effects upon their view would not be significant. The Inspectorate agrees that impacts on these receptors are not likely to result in significant effects and can be scoped out of further assessment.
328	Table 8.4 and Appendix B	Cumulative effects of similar developments without intervisibility or outside of the study area	The applicant proposes to scope out an assessment of cumulative landscape and visual effects for development that is located beyond the study area or without intervisibility. The Inspectorate considers that there is potential for effects on receptors where the ZTVs of the proposed development and a cumulative scheme overlap rather than where two cumulative schemes have intervisibility or is located within the study area presented in Figure 8.1 (which also excludes the cable corridors). On this basis, the Inspectorate does not agree to scope this matter out. The ES should present an appropriate methodology for identifying and assessing cumulative LVIA effects and provide an assessment of effects where they are likely to be significant or provide evidence to demonstrate the absence of LSE including agreement with relevant consultation bodies.
329	Table 8.4 and Appendix B and 3.5.30	Night-time and/or lighting effects	The Scoping Report states that lighting effects during construction would be temporary and minimal. Furthermore, operational lighting would be motion-activated and directed into the compounds. No information on potentially affected receptors has been provided in the Scoping Report. The Scoping Report also identifies that there would be short periods of 24-hour construction lighting i.e. during trenchless crossings. It is not explained why this would not lead to LSEs. The ES should explain the construction and operational lighting strategy and how the lighting design has been developed to minimise light spill and the effect of intermittent lighting on receptors. The ES should provide an assessment of lighting effects during construction, operation and decommissioning, including a night-time assessment, or the information required to demonstrate the absence of a LSE.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3210	Table 8.4 and Appendix B	Residential Visual Amenity Assessment (RVAA) for properties within 250m of the proposed development – construction and decommissioning phases And RVAA for properties beyond 250 m from the proposed development	The Scoping Report proposes to scope this matter out on the basis that construction and decommissioning impacts would be for a short duration and the proposed development would be comprised of structures of relatively low height that are not located in close proximity to residential receptors. The Inspectorate does not agree to scope this matter out. The Inspectorate understands that in the Landscape Institute's Technical Guidance Note TGN 2/19: 'Residential Visual Amenity Assessment' the requirement for an RVAA is generally dependent on the outcome of a LVIA. The need for an RVAA should be justified based on the conclusions of the LVIA presented in the ES and agreed with the relevant consultation bodies. In the absence of an LVIA for the construction and decommissioning phases, the Inspectorate does not have sufficient evidence to agree to scope this matter out of further assessment.

ID	Ref	Description	Inspectorate's comments
3211	8.3.11 on page 81	Study area of cable corridor	The Scoping Report proposes a 0.5km study area from the outer boundary of the cable corridor options on the basis that the cabling construction would be localised, temporary and short in duration. The ES should demonstrate any agreement with the relevant consultation bodies on this study area and explain if/where this accords with guidance or if not, explain the reason for this.
3212	8.3.62	Viewpoints	The Scoping Report states that the proposed viewpoints would be subject to further refinement and agreement with the relevant stakeholders. The Inspectorate advises that the ES should include confirmation of the consultation undertaken, together with evidence of agreement about the final viewpoint selection. Where any disagreement remains, an explanation as to how the final selection was made should be provided. Viewpoint locations should be identified on a figure within the ES.

ID	Ref	Description	Inspectorate's comments
			The applicant's attention is drawn to the comments from Bolsover District Council, Canal and River Trust, Ravenfield Parish Council and Rotherham Metropolitan Borough Council (RMBC) (Appendix 2 of this Opinion) requesting for additional viewpoints.

3.3 Cultural Heritage and Archaeology

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Table 9.3 and Appendix B	Assessment of the direct effects to heritage assets outside the site boundary – all phases	The Scoping Report proposes to scope the assessment of the direct effects to heritage assets outside the site boundary except those along transport routes on the basis that direct effects to heritage assets outside the site boundary would not be significant. However, Figure 9.5 identifies that there are a number of receptors that may be located within close proximity to the site boundary and it is uncertain as to whether they would be subject to direct impacts from within the site boundary e.g. vibration from piling. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
332	9.4.5, Table 9.3 and Appendix B	Indirect effects to the setting heritage assets within the cable route – all phases	The Scoping Report proposes to scope this matter out on the basis that above ground infrastructure associated with the cable route would be limited and the duration of indirect effects relating to setting would be short during the construction phase. The Inspectorate agrees that significant indirect effects as a result of the operation within the cable route are unlikely to occur and this matter can be scoped out of the ES. However, the Inspectorate does not agree to scope this matter out of the construction and decommissioning phases as the estimated construction period would last for 24 to 36 months, and decommissioning is expected to take 12-24 months. The ES should include an assessment of significant effects for construction and decommissioning, unless evidence is provided in the ES demonstrating the absence of a LSE and agreement with the relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
333	9.3.4	Study area	The Scoping Report states that the study area including the site itself and an area of 1km from the scoping boundary will be used to inform the heritage baseline against potential direct impacts and effects of heritage assets and a study area of up to 3km from the scoping boundary will be used to identify potential indirect effects to designated assets. However, the ZTV mapping provided at Appendix A2, Figure 8.1 identifies potential visibility beyond these extents. The ES should establish the study area with reference to the extent of the likely impacts and informed by fieldwork and the ZTV. The ES should demonstrate any agreement with relevant consultation bodies.
334	9.3.7 to 9.39	Study area of cumulative impacts	The Scoping Report states that a 3km study area will serve as the initial extent of the cumulative impact assessment and consideration would also be given to other relevant assets located beyond this search area. The Inspectorate considers the application of an arbitrary 3km is not appropriate to determine the study area for cumulative effects. The ES should present an appropriate methodology for identifying and assessing cumulative effects and provide an assessment where effects are likely to be significant. The ES should demonstrate any relevant agreement with consultees.

3.4 Ground Conditions and Land Quality

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Table 10.1	Construction of cables on possible best and most versatile (BMV) land - construction	The Scoping Report proposes to scope out an assessment of construction impacts from the laying of cables on BMV land on the basis that this will be a temporary effect as soils will be restored post construction. However, the Inspectorate considers that effects may be significant even if they are temporary. It is currently unclear what the loss of BMV land will be during construction and Scoping Report paragraph 10.2.4 states that Agricultural Land Classification (ALC) surveys will be performed across the 'site' which is defined as the array area only in Scoping Report paragraph 1.1.6, omitting surveys of the cable corridors. The Inspectorate does not have sufficient information at this stage to exclude the possibility of significant effects to BMV land. Accordingly, the ES should include an assessment of this matters or evidence demonstrating agreement with the relevant consultation bodies and the absence of LSE. The applicant should undertake ALC surveys for the whole site, including the cable corridor, to support the ES or provide justification for an alternative methodology. The ES should contain a clear tabulation of the areas of land in each BMV classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives.
34.2	Table 10.1	Construction and operation within Mineral Safeguarding Areas (MSAs) - construction	The Scoping Report proposes to scope out an assessment of impacts on MSAs on the basis that mitigation measures, including extraction of minerals prior to construction and consultation with the Minerals Planning Authority, will reduce the LSE on these resources. Scoping Report paragraph 10.4.3 states that MSAs are present in all areas of the proposed development and therefore there is a risk of sterilisation and inhibiting access to these resources during the lifetime of the development.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			It is also uncertain whether extraction of minerals prior to construction would be viable and may have associated environmental effects and whether other mitigation is available to minimise/avoid adverse effects. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters out. Accordingly, the ES should include an assessment of these matters, or the information referred to demonstrating agreement with the relevant consultation bodies, including the Mineral Planning Authority and the absence of a LSE. The ES should include a figure identifying the extent of any MSAs in relation to the proposed development.
34.3	Table 10.1	Unstable ground conditions - construction	The Scoping Report proposes to scope this matter out on the basis that the project will utilise reports from the Mining Remediation Authority to report the level of risk and ensure no LSE from unstable ground conditions, and any measures will be set out in an Outline Construction Environmental Management Plan (oCEMP) and Outline Environmental Materials Management Plan (oEMMP). The Inspectorate notes in Scoping Report paragraph 10.3.13 and 10.4.1 that the site and cable corridor options lie in areas of high-risk due to geotechnical instability and that a phase 1 geotechnical study has not yet been carried out. The information pertaining to the risk associated with ground conditions is currently unknown at this stage and it is not clear what measures would be set out in the oCEMP and oEMMP to ensure no LSE, therefore on this basis this Inspectorate does not agree to scope this matter out. The ES should characterise the baseline to determine the potential risks of unstable ground. The ES should demonstrate how this has informed design and any appropriate mitigation measures; any agreement with relevant consultees should be evidenced and mitigation appropriately secured through the draft Development Consent Order (dDCO). This should include assessment of potential impacts from ground instability as a result of the proposed development on other environmentally sensitive receptors eg Harthill reservoir and associated waterways.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
344	Table 10.1	Contaminated land - construction	The Scoping Report states that contaminated land phase assessment reports will be developed and mitigation measures will be set out in the oCEMP and oEMMP to ensure no potential LSE could occur. The Inspectorate notes that the proposed development lies in an area of historic coal mining, the risk and extent of ground contamination is unknown at this stage and no mitigation measures are described. In the absence of information such as relevant agreement with consultees, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of this matter, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
345	Table 10.1	Physical damage to soils – construction and decommissioning	The Scoping Report states that impacts to soil structure and compaction during construction can be managed via an oCEMP and oEMMP to mitigate potential effects. The Inspectorate notes that the oEMMP will be developed to ensure the handling, storage and disposal of materials and the oCEMP will mitigate residual impacts during construction on material handling. No further detail on mitigation measures is provided. In the absence of information such as identified mitigation measures, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Description	Inspectorate's comments
346	10.3.5	Study area	Scoping Report paragraph 10.3.5 states that a data search buffer of up to 100m will be applied to this assessment based on professional judgement. The ES should justify the application of professional judgement in determining this study area and explain how this aligns with the ZOI. The applicant should evidence any agreement with the relevant consultees.

ID	Ref	Description	Inspectorate's comments
34.7	n/a	Impacts to geology including sensitive geological sites	The Scoping Report sets out the geological baseline conditions located within the proposed development; however, it is unclear whether LSE to the geology of the site have been assessed and will be scoped in or out as these are not included in Table 10.1 of the Scoping Report. Similarly, the Scoping Report does not appear to state or assess whether any sensitive geological sites (geological SSSI's) would be impacted by the proposed development. The ES should provide an assessment of impacts to geology during construction, operation and decommissioning, including an assessment on sensitive geological sites, or the information required to demonstrate the absence of a LSE.
34.8	Table 10.1	Contaminated land - Operation and Decommissioning	The Scoping Report does not appear to consider impacts from contaminated land during operation and decommissioning. The ES should include an assessment where there is potential for LSE to occur across all phases of the proposed development unless evidence is provided in the ES demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

3.5 Water Resources and Flood Risk

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	Table 11.4	Soils, ground conditions and contaminated land	Impacts to soils, ground conditions and contaminated land is scoped out on the basis that LSE will be assessed in the ES Chapter 10 Ground Conditions and Land Quality. The Inspectorate agrees with this approach on the basis the ES includes appropriate cross references.
35.2	Table 11.4	Ecological receptors	LSE on ecological receptors are proposed to be assessed in ES Chapter 7, Biodiversity and Nature Conservation. The Inspectorate agrees with this approach on the basis the ES includes appropriate cross references.
35.3	Table 11.4	Potable and wastewater supplies	The Scoping Report explains that there would be no connection to existing networks and no additional demands on supply and demand of potable water networks. However, the Inspectorate notes in Scoping Report paragraph 11.6.2 that the management and discharge of wastewater is not yet confirmed and therefore subsequent effects are unknown. Consumptive uses of water are referenced in the report such as supply for welfare stations, dust suppression measures and wheel washing (Scoping Report paragraph 3.5.35). In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of these matters, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Description	Inspectorate's comments
354	10.3.7 and 11.3.5	Aquifers	Aquifers are mentioned in Scoping Report paragraph 10.3.7 as 'other receptors considered within the study area' but are not described in the preliminary baseline conditions and it is unknown whether they are present in the study area. The ES should describe the baseline conditions in terms of aquifers and assess any significant effects on these receptors where they are likely to occur.
355	11.4.2 and Table 11.4	Cumulative effects during operation	The Scoping Report does not explain why cumulative effects are not proposed to be assessed during operation. As impacts during operation are identified in Scoping Report paragraph 11.4.2, the Inspectorate considers that these could act cumulatively with other plans and projects during operation. The ES describe an appropriate methodology for identifying and assessing cumulative effects and should provide an assessment of LSE with cumulative schemes for all phases of the development where they are likely to occur.
356	11.4.1	Culverts	Potential impacts include construction of culverts for access in Scoping Report paragraph 11.4.1. Where culverts are proposed, the ES should demonstrate in line with the mitigation hierarchy, why culverts are required instead of alternative means. The applicant should discuss the approach to watercourse crossings with the EA and demonstrate any relevant agreement in the ES.
357	3.5.7 and 11.5.14	Concrete ballast foundations	These are proposed as potential mounting structures where ground penetration is unsuitable. Scoping Report paragraph 11.5.14 states that Sustainable Urban Drainage Systems principles will be incorporated into the design to ensure that runoff from hardstanding areas does not result in an increase in flood risk elsewhere. However, it only proposed this will be applied to the BESS and substation areas. The Inspectorate considers that there should be assessment of potential effects from runoff for areas where concrete ballast foundations are proposed and that where effects are identified appropriate mitigation should be described and secured where relevant.
358	3.2.21	Harthill Reservoir	The proposed development is located adjacent to Harthill Reservoir. Whilst impacts to the reservoir are proposed to be assessed in terms of LVIA effects, there is no mention of assessing potential effects to its function in the Water Resources and Flood Risk Chapter.

ID	Ref	Description	Inspectorate's comments
			The ES should assess potential significant effects to the reservoir and its functional operations in relation to water resources and flood risk where they are likely to occur. This should include effects on any associated watercourses eg Broadbridge Dyke feeder and the Chesterfield Canal.

3.6 Climate Change and Greenhouse Gas Assessment

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
36.1	Table 12.2	Sea level rise	The Inspectorate agrees that as the proposed development is not located within an area susceptible to sea level rise that this matter may be scoped out.
36.2	Table 12.2	Coastal flooding	The Inspectorate agrees that as the proposed development is not located in a coastal location, that this matter may be scoped out.
36.3	Table 12.3	In-Combination climate impacts	The Scoping Report states that the scope of in-combination climate impacts will be reviewed to determine whether this matter is scoped in. For clarity, the Inspectorate considers that this matter should be scoped in as no evidence to scope this matter out has been provided. In-combination climate impacts are listed in the operational phase of the proposed development but should be considered across the full phasing of the development ie construction, operation and decommissioning.

ID	Ref	Description	Inspectorate's comments
36.4	12.5	Exacerbation of climate change effects	The Scoping Report does not refer to the exacerbation of climate change effects beyond flood risk and the methodology for this is not included in the proposed scope of the Scoping Report section 12.5. The ES should assess any significant effects that are likely to occur from in-combination climate change effects and signpost where this is assessed or provide justification as to why this would not lead to a LSE.
36.5	Table 12.1	GHG emission sources during decommissioning	Scoping Report Table 12.1 identifies the sources of GHG emissions from construction, operation and decommissioning activities. Scoping Report paragraph 3.6.21 states that decommissioning will be similar to the construction process suggesting similar activities

ID	Ref	Description	Inspectorate's comments
			would take place at both construction and decommissioning. However, a number of construction activities that generate GHG emissions are not considered in the decommissioning activities without explanation. The ES should identify which GHG emission source activities during construction are applicable during decommissioning and include an assessment of significant effects where they are likely to occur.
366	Table 12.1	Impacts from waste during construction and decommissioning	Scoping Report Table 12.1 identifies waste generation as a source of GHG emissions during operation but not during construction or decommissioning; only transportation of waste is identified as an impact. This discrepancy is not explained. The ES should identify what GHG emission sources are applicable to each phase of the proposed development and provide an assessment of significant effects where they are likely to occur.

3.7 Air Quality

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.1	Table 13.2 13.4.2 and 13.4.3	Air quality impacts during operation	The Scoping Report proposes to scope this matter out as there are no combustion sources included as part of the operational phase of the proposed development, and due to the low number of traffic movements required (regular maintenance visits only) traffic emissions are considered to be negligible. On the basis that the ES confirms that traffic movements required during operation are below appropriate threshold guidance levels so that there would be no likelihood of significant effects, the Inspectorate agrees to scope this matter out.

ID	Ref	Description	Inspectorate's comments
372	Table 13.3	Traffic effects during decommissioning	The Scoping Report anticipates that decommissioning activities would be similar to those during construction. Effects from decommissioning activities are proposed to be scoped in but decommissioning traffic is not identified although construction traffic is scoped in. The ES should assess significant effects to air quality from traffic at decommissioning where they are likely to occur or provide justification as to why there would not be any LSE.
373	13.1.2	Ammonia	Scoping Report paragraph 13.1.2 identifies potential air pollutants to be assessed in the ES. This does not include ammonia without explanation. The ES should include ammonia in the assessment of air pollutants on sensitive receptors where significant effects are likely to occur.

3.8 Traffic and Transport

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
38.1	Table 14.1	Traffic and transport – operation phase	The Scoping Report proposes to scope out operational phase traffic and transport on the basis there will be low volumes of operational traffic associated with the proposed development. The Inspectorate agrees to scope this matter out, subject to the ES confirming the frequency and type of vehicles would remain are below appropriate threshold guidance levels and would not give rise to a significant effect.
38.2	Table 14.1	Traffic and transport – decommissioning phase	The Scoping Report proposes to scope out decommissioning phase traffic and transport on the basis that traffic will be similar to the construction phase. The Inspectorate notes that prior to decommissioning the applicant proposes to undertake a traffic assessment due to the uncertainty around predicting traffic flows in the future. The Inspectorate is content to scope this matter out of further assessment on the basis that the ES secures the future traffic assessment prior to decommissioning through the DCO, demonstrating any relevant agreement with the consultation bodies.

ID	Ref	Description	Inspectorate's comments
38.3	14.3.2 and 14.3.3	Study Area	The study area has been defined as roads that are expected to be affected by increased traffic flows; these roads are listed in Scoping Report paragraph 14.3.10. However, it is not clear what methodology was used to include these roads into the assessment. The ES should justify how the study area has been identified and provide a figure illustrating the extent of the study area and the expected route(s) of construction traffic with reference to relevant industry guidance, and any relevant agreement with consultation bodies.

ID	Ref	Description	Inspectorate's comments
384	14.3.10	Access points and routes to the proposed development	The Scoping Report states that access routes and arrangements are not yet known at this stage but that at least 25 access points would be required. The ES should provide a description of the proposed access routes along with any associated highways works and identify works/accesses and routing on a Figure and in the Construction Traffic Management Plan (CTMP). The ES should assess any associated significant effects that may arise as a result of any highways works where they are likely to occur.
385	14.3.11 - 14.3.13	Public Rights of Way – baseline use	The Scoping Report states there are a number of PRow's which cross or pass close the proposed site boundary and these are expected to be temporarily diverted or closed during construction. However, the Scoping Report does not explain how the baseline use of these PRow's will be established. The ES should explain the methodology for determining the baseline use of PRow's and provide any relevant agreement with consultation bodies. For the avoidance of doubt the ES should assess the impacts to PRow and on walking, cycling and horse-riding receptors from the proposed development where significant effects are likely to occur.

3.9 Noise and Vibration

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
391	Table 15.3	Road traffic noise during operation	The Scoping Report proposes to scope this matter out on the basis that no permanent staff will be required for operation of the proposed development, and only 'occasional' vehicle access will only be required for maintenance. On the basis that the ES confirms that traffic movements required during operation are below appropriate threshold guidance levels so that there would be no likelihood of significant effects, the Inspectorate agrees to scope this matter out.
392	Table 15.3	Vibration from equipment during operation	The Inspectorate agrees that during operation it is unlikely that the infrastructure would be a significant source of significant vibration and that this matter can be scoped out of further assessment.
393	Table 15.3	Noise from cable corridor during operation	The Scoping Report states that operational noise from the cable corridor is not expected during operation. The Inspectorate notes in Scoping Report paragraph 3.5.23 that higher voltage cabling is likely to be laid underground. On the basis the ES confirms and secures that higher voltage cabling above 132kV is buried to a sufficient depth demonstrating appropriate mitigation of any potential significant noise effect the Inspectorate considers that this matter can be scoped out.
394	Table 15.3	Noise and vibration from plant and equipment used during decommissioning	Scoping Report paragraph 15.4.3 states that impacts during construction would be comparable to those at decommissioning and so a separate assessment for the decommissioning stage is not considered necessary. The Inspectorate does not agree to scope this matter out on the basis that it is scoped in for construction in Table 15.3 and anticipated to be similar to construction suggesting possibility for a LSE. However, the Inspectorate agrees that the conclusions of the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			construction phase can be applied to the decommissioning phase of the proposed development for this matter on the basis that the impacts and effects would be comparable. The ES should provide an assessment of significant effects where they are likely to occur or provide sufficient evidence to support scoping out these matters.
395	Table 15.3	Noise from traffic during decommissioning	The Scoping Report proposes to scope this matter out on the basis that increases in noise from road traffic during the decommissioning phase are expected to be similar to those generated during the construction phase. The Inspectorate does not agree to scope this matter out on the basis that it is scoped in for construction in Table 15.3 and anticipated to be similar to construction suggesting possibility for a LSE. The ES should provide an assessment of significant effects where they are likely to occur or provide sufficient evidence to support scoping out these matters.

ID	Ref	Description	Inspectorate's comments
396	13.3.2	Study area	The Scoping Report states that the study area the assessment of noise and vibration will be refined as the design progresses to the draft ES stage but does provide an estimated study area based upon the experience of similar developments. The ES should clearly define the study area used within the assessment based on the zone of influence; this should be informed by appropriate consultation where relevant.
397	n/a	Vibration impacts on waterways and water infrastructure	Given the location of the proposed development in relation to watercourses such as the Chesterfield Canal and water infrastructure such as Harthill reservoir, the ES should assess potential vibration impacts on the stability and ecology of these receptors. Please see ref 3.5.8 of this Scoping Opinion.

3.10 Socio-Economics, Land Use, Tourism and Recreation

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 16.4	Wider socio-economic effects during operational phase	The Scoping Report states that impacts such as structural economic changes and disruption to established industries are not anticipated to arise during the operational phase of the proposed development. The Inspectorate agrees that significant effects are unlikely to occur and that this matter can be scoped out of the ES.
3.10.2	Table 16.4	Socio-cultural effects during operational phase	The Scoping Report states that socio-cultural effects during operational phase of the proposed development are not expected to arise but no further justification is provided. The Inspectorate also notes that indirect effects on the setting of designated heritage assets and non-designated heritage assets are scoped into the ES Chapter Cultural Heritage and Archaeology. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.10.3	Table 16.4	Direct and indirect effects on tourism and recreation receptors during operational phase	The Scoping Report states that direct and indirect effects on tourism and recreation receptors during operational phase are not expected to arise and any permanent changes arising during construction that would continue into the operational phase will be assessed as permanent construction effects. The Inspectorate considers that this approach is unclear in relation to the impacts being assessed on tourism. For example, the impacts and subsequent effects on tourism have potential to be different during construction compared to operation.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			On this basis the Inspectorate does not agree to scope this matter out. The ES should assess significant construction and operation effects separately where they are likely to occur.
3.104	Table 16.4	Effects on tourism accommodation during operational phase	The Scoping Report states that the amount of worker's accommodation required will be very small. The Inspectorate agrees that there is unlikely to be significant effects and that this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.105	n/a	n/a	n/a

3.11 Other Environmental Topics

(Scoping Report Section 17)

ID	Ref	Applicant's proposed aspects to scope out	Inspectorate's comments
3.11.1	17.1	Waste	The Scoping Report proposes to scope out effects from waste during construction, operation and decommissioning on the basis that the proposed development would comply with relevant waste legislation and that mitigation in the form of best practice measures, adherence to the waste hierarchy and appropriate monitoring to ensure compliance will be secured. The Inspectorate does not agree to scope this matter out on the basis that insufficient information has been provided. Waste streams during construction are not discussed in the Scoping Report. Waste streams during operation include replacement of infrastructure and at decommissioning, infrastructure is proposed to be recycled as a first-choice option. However, Scoping Report paragraph 17.1.26 states that the anticipated quantities of waste are currently unknown and no assumptions are provided. The Inspectorate considers that significant amounts of waste could be produced during construction, operation (eg panel replacement) and decommissioning (eg disposal of infrastructure) and further information is required to demonstrate that this would not lead to a LSE. The ES should include estimates, by type and quantity, of expected residues and emissions and quantities and types of waste produced during the construction, operation and decommissioning phases and assess any LSE arising from the transportation and disposal of waste. This should include any potential cumulative effects where they are likely to be significant. The ES should outline what measures, if any, are in place to ensure that components (eg from batteries and / or panels) are able to be diverted from the waste chain and disposed of safely given that some types of solar panels can contain hazardous materials.

3.112	17.2	Glint and Glare effects during construction and decommissioning	The Inspectorate agrees that this matter can be scoped out on the basis that the effects would only be anticipated during operation.
3.113	17.2	Glint and Glare during operation	The Scoping Report proposes that a glint and glare technical assessment will inform an assessment of LSE in the LVIA Chapter. The Scoping Report states that potential impacts will also be considered for trains and aviation, but it is unclear whether these receptors will be assessed in the LVIA chapter or another chapter. The Inspectorate agrees with the approach of submitting a technical assessment rather than having a separate chapter assessment however, the technical assessment should cross reference to where the LSE on identified receptors are assessed in the ES. This should at least include transport receptors, cultural heritage and landscape and visual receptors where significant effects are likely to occur.
3.114	17.3	Telecommunications and Utilities	The Scoping Report states that the proposed development is not anticipated to interfere with above-ground telecommunications. The applicant proposes to undertake consultation with relevant utilities and telecommunications providers to inform any protective measures required to safeguard any potentially affected infrastructure. The Inspectorate agrees that this matter may be scoped out on the basis the ES demonstrates that the design has appropriately safeguarded telecommunications and utilities infrastructure providing evidence of agreement with the relevant consultees.
3.115	17.4	Major Accidents and Disasters	Scoping Report paragraph 17.4.9 identifies that there is potential for a LSE where design mitigation is unable to remove potential interaction between a major accidents and disaster and a particular technical topic. The Scoping Report states that potential LSE from major accidents and disasters will be reported in the 'Other Environmental Topics' chapter of the ES. The Inspectorate notes the consultation response from the Health and Safety Executive identifies that the proposed development crosses the consultation zones of several major accident hazard sites and pipelines.

			The Inspectorate agrees with the approach on the basis that it appropriately cross references between relevant aspect chapters and the 'Other Environmental Topics' chapter to clarify where LSE are assessed for specific major accidents and disasters. The ES should also include an assessment of any identified potential impacts to/from crossing major accident hazard sites and pipelines.
3.11.6	17.5	Electromagnetic Fields (EMFs)	The Inspectorate agrees that a separate chapter for EMFs can be scoped out of the ES on the basis that the EMF assessment will be provided as a technical appendix to support any relevant ES chapter assessments. As cables have potential to be above 132kV, the technical appendix should inform the assessment of LSE and mitigation measures in any relevant aspect chapters to assess potential effects on both human and ecological receptors. The ES should clearly cross reference where significant effects from EMF are reported and assessed.
3.11.7	17.6	Human Health	Significant effects on human health are proposed to be assessed in air quality, traffic and transport and noise and vibration aspect chapters with impacts to mental health proposed to be assessed in the LVIA chapter and a RVAA. The Inspectorate agrees with this approach on the basis that the ES clearly signposts where and how human health is assessed in these relevant aspect chapters.
3.11.8	17.7	Population	The Inspectorate agrees that a separate chapter may be scoped out and that this aspect will be assessed, and LSE reported in the socio-economics and land use chapter.

3.12 Cumulative Effects

(Scoping Report Section 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.121	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.122	18.2.3, 18.2.4 and Appendix F	Location of developments considered in the cumulative effects assessment (CEA)	Appendix F of the Scoping Report lists the current projects considered cumulatively with the proposed development. This provides a description and distance to the proposed development and the reason whether they would be progress to stage 3 of the CEA. This list should be kept under review and updated accordingly in consultation with the relevant bodies to inform the assessment of likely significant cumulative effects in the ES. For the avoidance of doubt, the applicant should seek to agree its list of cumulative developments with the relevant LPAs. The ES should include a figure depicting the locations and extent of cumulative developments in relation to the proposed development.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	Orgreave Parish Council
	Catcliffe Parish Council
	Eckington Parish Council
	Killamarsh Parish Council
	Barlborough Parish Council
	Whitwell Parish Council
	Shireoaks Parish Council
	Hodsock Parish Council
	Styrrup with Oldcotes Parish Council
	Harthill with Woodall Parish Council
	Wales Parish Council
	Aston cum Aughton Parish Council
	Todwick Parish Council
	Anston Parish Council
	Dinnington St John's Town Council
	Whiston Parish Council
	Thurcroft Parish Council
	Laughton-en-le-Morthen Parish Council

	Maltby Town Council
	Ravenfield Parish Council
	Waverley Community Council
	Treeton Parish Council
	Thorpe Salvin Parish Council
	Ulley Parish Council
	Woodsetts Parish Council
	Firbeck Parish Council
	Brinsworth Parish Council
	Wickersley Parish Council
	Dalton Parish Council
	Bramley Parish Council
	Hellaby Parish Council
	Thrybergh Parish Council
	Conisbrough Parks Parish Council
	Tickhill Town Council
	Sprotbrough and Cusworth Parish Council
	Braithwell with Micklebring Parish Council
	Stainton Parish Council
	Edlington Town Council
	Barnburgh and Harlington Parish Council
	Old Denaby Parish Council
	Adwick upon Dearne Parish Council
	High Melton Parish Council
	Warmsworth Parish Council

The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	Forestry Commission Yorkshire and North East
	Forestry Commission East and East Midlands
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The Canal and River Trust	The Canal and River Trust
The relevant Highways Authority	City of Doncaster Council Highways Department
	Rotherham Metropolitan Borough Council Highways Department
	Derbyshire County Highways Department
	National Highways
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The Coal Authority	Mining Remediation Authority
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	South Yorkshire Mayoral Combined Authority
	Police and Crime Commissioner for Derbyshire
The relevant ambulance service	Yorkshire Ambulance Service NHS Trust
	East Midlands Ambulance Service NHS Trust
	Derbyshire Fire and Rescue Service

The relevant fire and rescue authority	South Yorkshire Fire and Rescue
--	---------------------------------

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Derby and Derbyshire Integrated Care Board
	NHS Nottingham and Nottinghamshire Integrated Care Board
	NHS South Yorkshire Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	Yorkshire Ambulance Service NHS Trust
	East Midlands Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	The Canal and River Trust
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Severn Trent
	Yorkshire Water
	Cadent Gas Limited

STATUTORY UNDERTAKER	ORGANISATION
The relevant public gas transporter	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity distributor with CPO Powers	National Grid Electricity Distribution (East Midlands) Limited
	Northern Powergrid (Northeast) Limited
	Northern Powergrid (Yorkshire) plc

STATUTORY UNDERTAKER	ORGANISATION
	Advanced Electricity Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Chesterfield Borough Council
Bolsover District Council
Amber Valley Borough Council
North East Derbyshire District Council
Bassetlaw District Council
Derbyshire Dales District Council
Peak District National Park Authority
City of Doncaster Council
Rotherham Metropolitan Borough Council
Wakefield Metropolitan District Council
North Yorkshire Council
East Riding of Yorkshire Council
North Lincolnshire Council
Derbyshire County Council
Kirklees Metropolitan Council
Oldham Metropolitan Borough Council
Sheffield City Council
Stockport Metropolitan Borough Council
Tameside Metropolitan Borough Council
Cheshire East Council
Derby City Council
Barnsley Metropolitan Borough Council
Nottinghamshire County Council

LOCAL AUTHORITY
Staffordshire County Council
Leicestershire County Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Adwick Upon Dearne Parish Council
Aston-Cum-Aughton Parish Council
Barnsley Metropolitan Borough Council
Bolsover District Council
Braithwell and Micklebring Parish Council
Bramley Parish Council
Canal & River Trust
Chesterfield Borough Council
City of Doncaster Council
Conisbrough Parks Parish Council
East Riding of Yorkshire Council
The Environment Agency
Forestry Commission
Harthill with Woodall Parish Council
Historic England
Health & Safety Executive
Kirklees Metropolitan Council
Laughton-en-le Morthen Parish Council
National Highways

NATS
Natural England
North Lincolnshire Council
Northern Gas Networks
Oldham Metropolitan Borough Council
Ravenfield Parish Council
Rotherham Metropolitan Borough Council
Sprotbrough & Cusworth Parish Council
Stainton Parish Council
The Coal Authority
Thrybergh Parish Council
Treeton Parish Council
UK Health Security Agency
Ulley Parish Council
Wales Parish Council
Wickersley Parish Council

DPC:76616c646f72



Dear Madam,

The Parish Council of Adwick upon Dearne is of the opinion that whilst against any proposals for solar farms, the application is some distance from Adwick upon Dearne village to not to make any impact.

Yours sincerely,

Keith Coulton

Clerk to the Council

From: [Kate Butler](#)
To: [Whitestone Solar](#)
Subject: RE: EN0110020 - Whitestone Solar Farm - EIA Scoping and Consultation and Regulation 11 Notification
Date: 22 May 2025 15:58:34
Attachments: [image002.png](#)
[image004.png](#)
[image006.png](#)
[image008.png](#)
[image010.png](#)

You don't often get email from clerk@aston-pc.gov.uk. [Learn why this is important](#)

Good Afternoon,

Aston-cum-Aughton Parish Council acknowledges that the Whitestone Development scoping document for Rotherham comprehensively addresses the key areas that we believe should be included. We are satisfied with the overall scope and detail provided. However, we wish to express our concern regarding the treatment of the three proposed sites. It appears that these are being considered collectively as a single site rather than being assessed individually. We believe that each site has unique characteristics and potential impacts that warrant separate evaluation to ensure a more accurate and transparent planning process.

Kind regards

Kate

Kate Butler
Parish Clerk and Responsible Finance Officer



This email is confidential, may be legally privileged and contain personal views that are not the views of the Parish Council. This communication is intended solely for the intended recipient(s) only and may contain sensitive or protectively marked material up to RESTRICTED. If you have received this email in error any use, dissemination, forwarding, printing, copying or disclosure thereof is strictly prohibited, therefore please advise the sender and then delete the email from your system and destroy any copies of it.

Viruses: please note that the Council does not, to the extent permitted by law, accept any liability (whether in contract, negligence or otherwise) for viruses and it is your responsibility to scan any attachments.

From: [Larder, Rebecca \(SENIOR PLANNING OFFICER\)](#)
To: [Whitestone Solar](#)
Subject: EN0110020
Date: 20 May 2025 10:21:49

You don't often get email from rebeccalarder@barnsley.gov.uk. [Learn why this is important](#)

Good Morning,

Thank you for your consultation request.

At this stage we do not have any comments to make on the proposal. Should the scheme progress we would like the opportunity to provide further comments at that stage.

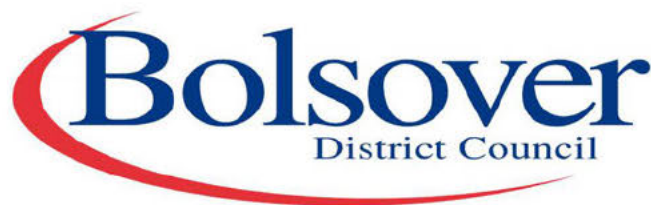
Kind Regards,
Rebecca

Rebecca Larder
Senior Planning Officer
Development Management
Barnsley Council

Telephone: [REDACTED]
[REDACTED]

*** Barnsley Council Disclaimer: This email and any files attached are confidential for the use of the intended recipient. If you have received this email in error please notify the sender as soon as possible and delete the communication from your system without copying, disseminating or distributing the same in any way by any means. Any views or opinions expressed belong solely to the author and do not necessarily represent those of the council. In particular, the council will not accept liability for any defamatory statements made by email communications. Recipients are responsible for ensuring that all emails and files sent are checked for viruses. The council will not accept liability for damage caused by any virus transmitted by this email. No guarantees are offered on the security, content and accuracy of any emails and files received. Be aware that this email communication may be intercepted for regulatory, quality control, or crime detection purposes unless otherwise prohibited. The content of this email and any attachment may be stored for future reference. Link to privacy statement - <https://www.barnsley.gov.uk/services/information-and-privacy/your-privacy/>

Your Ref: EN0110020
Our Ref: 25/00195/NCO
Case Officer: Mr Peter Sawdon
Telephone: [REDACTED]
E-mail: [REDACTED]
Date: 21st May 2025



Emily Park (by e-mail)

The Arc
High Street
Clowne
Derbyshire
S43 4JY

Chris Whitmore MRTPI
Development Management and Land
Charges Manager

Dear Emily Park

Inspectorate Ref. No: EN0110020
Bolsover District Council Ref. No: 25/00195/NCO
Proposal: An Order granting development consent for the One Earth Solar Farm
Location: One Earth Solar Farm Out Of Area
Applicant: Emily Park

The following are Bolsover District Council's comments to the above pre-application notification. Our comments specifically focus on the potential impacts of the Whitestone 3 (the southernmost area) of the overall proposals, in view of its proximity to the boundary with this District Council's administrative area.

For the most part we are satisfied that the submitted documents appear comprehensive to form the basis of further works necessary to inform this proposal further, but would ask that the following points be taken into consideration.

It has been noted that the submitted documents have failed to identify the Grade 1 Listed Barlborough Hall (Historic England List Entry Number: 1108972), located approx. 1.15km from the development site boundary, and this will need including in the list of identified Heritage Assets, and appropriate assessment of the impacts of the development on this nationally important heritage asset will need to be undertaken.

Further to the above, we consider that it will be necessary to undertake viewpoint analysis from the upper floors and roof of the Grade 1 listed Barlborough Hall, as well as additional viewpoint(s) within or adjacent to its associated Conservation Area and Registered Park and Garden, the boundary of which is close to the development site and would be visible from it, in order to fully understand and assess the impacts on the Listed Building and other nearby heritage assets.



Tel 01246 242424

Email enquiries@bolsover.gov.uk **Web** www.bolsover.gov.uk

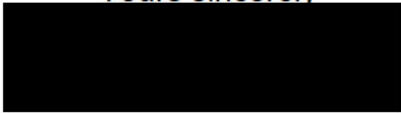
**CUSTOMER
SERVICE
EXCELLENCE**



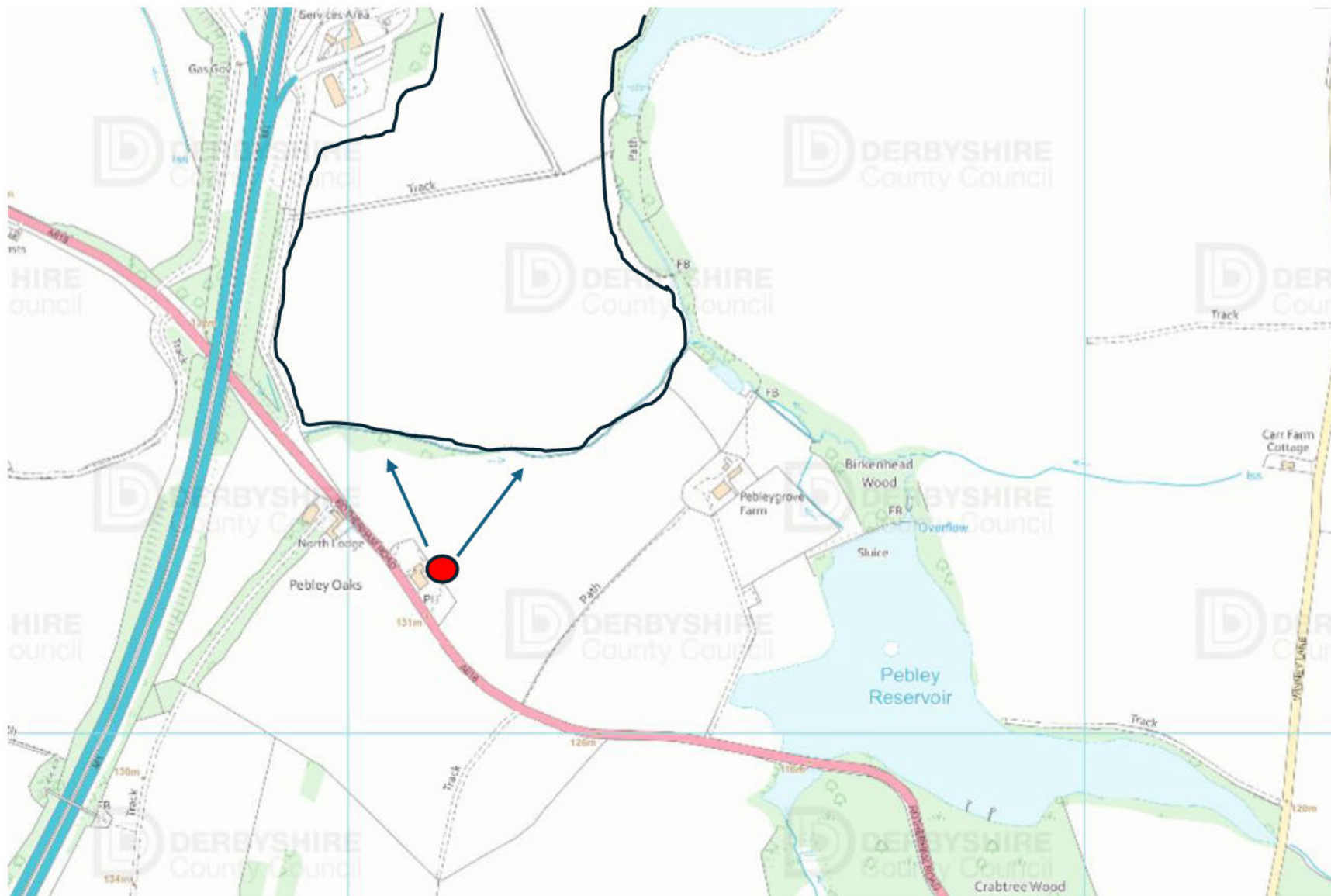
We also consider that a further viewpoint should be included from the rear garden area of the nearby Pebley Inn as shown on the attached plan, given the site would be readily visible from this site by visiting members of the public.

We would expect that impacts from glare to be considered given the development site's proximity to the road network, including the adjacent M1 motorway and the A618 Rotherham Road as given its low level, the development is likely to be at eye level in places.

Yours sincerely

A large black rectangular box redacting the signature of Peter Sawdon.

Peter Sawdon
Principal Planner



Braithwell with Micklebring Parish Council

22nd May 2025

Dear Sir/Madam,

We write to you with regard to the following application:

EN0110020 - Whitestone Solar Farm - EIA Scoping and Consultation and Regulation 11 Notification.

Whilst Braithwell with Micklebring Parish Council (BWMPC) are not opposed to solar farms and does support renewable energy production, we have to write to you as a statutory body to support the many residents in our parish and surrounding areas of Clifton, Conisbrough, Hooton Roberts, Micklebring & Ravenfield who are deeply concerned about the Whitestone One proposal. Our residents have specific concerns about the impact on the following:

Biodiversity and Nature Conservation

Braithwell with Micklebring refer to the existing policy position of City of Doncaster (known as CDC) as defined in the Adopted Local Plan 2015 – 2035. Specifically, the green belt designation and Policy 1 Settlement Hierarchy Green Belt.

“The openness and permanence of Doncaster’s Greenbelt will be preserved. The general extent of the Green Belt will be retained. Within the Green Belt, national planning policy will be applied including the presumption against inappropriate development except in very special circumstances”.

BWMPC & our residents believe that special circumstances cannot be applied to this proposal as there are other suitable alternative locations where solar development should be considered appropriate. On behalf of our residents, we would seek further information and clarification from the applicant on the site selection, processes undertaken and what other locations were considered and on what grounds they were discounted.

In relation to site selection and in particular Biodiversity and Nature Conservation, we refer you to the following CDC policies adopted in the Local Plan.

Policy 30: Valuing Biodiversity and Geodiversity (Strategic Policy)

The plan places an emphasis on protecting the internationally, nationally, and locally important habitats, sites and species within the Borough. Design proposals should accordingly reflect the concerns outlined in this policy approach where they apply.

Policy 32: Woodlands, Trees and Hedgerows (Strategic Policy)

This policy seeks to ensure that proposals have properly considered potential impacts during the design process, with appropriate surveys and assessments and outcomes demonstrated. It also clearly states that there will be presumption against development that results in the loss or deterioration of ancient woodland and/or veteran trees.

Policy 33: Landscape (Strategic Policy)

this focuses on supporting proposals that take into account existing landscape characteristics and that seek to conserve, enhance or restore said landscapes. Referenced within it are; landscape history, biodiversity, cultural character, tranquillity, views, nature conservation, water features and topography. The policy is detailed and has clear implications for both the design of the Proposed Development and the process upon which this design is reached.

With regard to these specific policies, BWMPC would seek reassurance from CDC that it has sufficient resources available to monitor this programme and effectively scrutinise the final Environmental Impact Assessment Report when it is published as part of the Statutory Consultation for the Development Consent Order. Equally, on behalf of the residents

Braithwell with Micklebring Parish Council

BWMPC would seek reassurances from Whitestone Net Zero Limited to engage proactively with all consultees and statutory bodies and the impacted communities directly in advance of the Statutory Consultation to ensure that all data and relevant understanding of the constituent elements of this area and its use is effectively captured and given due consideration before the final development form is defined for statutory consultation on the DCO application.

Landscape and Visual Impact

With regard to landscape and visual impact BWMPC recognise that Micklebring will be significantly affected by this proposed application. Micklebring is a small village located in South Yorkshire, England, situated approximately 6 miles east of Rotherham. It's part of the parish of Braithwell and is known for its rural and peaceful setting. Micklebring is surrounded by beautiful countryside, making it a great place for nature ramblers, dog walkers & horse riders alike and for those seeking tranquillity. It's located to the south of the River Don and is situated above the magnesian limestone escarpment, offering panoramic views. Micklebring predominately faces northwards across the valleys of the Don and the Dearne, with panoramic views as far as Emley Moor, Hoober Stand at Wentworth, Rotherham and the power stations to the north of Doncaster. From the Clifton Beacon agricultural land slopes down to the ancient town of Conisbrough, with its Norman Castle. The descriptions of the land of Conisbrough Parks made by Whitestone Net Zero Ltd does not take into account the villages of Micklebring and indeed Clifton being in an elevated position that looks 'over' the entire area designated for solar. The description that Whitestone One proposal will nestle in the 'bowl' in the landscape that will allow the panels to be hidden by the natural topography is misleading, and BWMPC with residents strongly disagree with this assumption. We would ask CDC to contact the applicant to qualify how they have arrived at a description that this designation is "dropped".

Cultural, Heritage and Archaeology

This simple, intact historic landscape is designated as an Area of Special Landscape Value. It is a strongly rural and in places tranquil landscape due in part to the lack of roads. There are some long views to urban areas, but overall, the landscape value and quality are considered to be high.

In BWMPC opinion LVIA Landscape viewpoints are taken from inside the development area and take no reference to views onto Conisbrough Parks or the impact on long range view both locally and outside the area. Viewers in this landscape include residents on the elevated urban edges of Conisbrough immediately to the north, residents in the villages on the edge of the limestone plateau to the east, residents of the scattered farmsteads and users of the network of public rights of way. Less sensitive viewers include those using the roads just outside the LCA. The sprawl of this proposal is vast and affects residents far and wide from a vista perspective.

Water Resources and Flood Risk

BWMPC note that the impact of surface water management will need significant consideration as the flood zone impacts extend to Conisbrough via Kearsley Brook and Firsby via Firsby Brook, from there through to Hooton Roberts via Ravenfield Ponds and Hooton Brook. Flooding, particularly in Conisbrough, is an existing issue and so on behalf of concerned residents in Conisbrough we would need to understand what additional impacts surface water run-off will contribute to this issue and how the mitigation strategy would be

Braithwell with Micklebring Parish Council

implemented, with note to other policies concerning biodiversity and nature conservation, landscape and visual impact, land use and tourism/recreation.

Traffic and Transport

The village of Micklebring will be clearly affected by construction vehicles if this plan is approved. Local knowledge of the area has clearly not been taken into consideration by Whitestone Net Zero Ltd (Green Nation). The A & B roads in Micklebring are already abused by PSV's & HGV's even though there is a weight restriction on Greaves Syke Lane. On writing to Whitestone (Green Nation) and raising these concerns they were in avoidance of a suitable answer. Cabling for this proposal may run down the side of the M18 which has the potential of loss of trees that shield the M18 and mitigate noise and road pollution.

The cabling is principally designed to come across Greaves Syke Lane to the west of Micklebring which is one of the main accesses in and out of the village and is near to residential properties. The cabling on the map designs runs across farmland, where the landowners have not been consulted. This design will surely impact on the M18 and the road network to and from Hellaby/Ravenfield and the villages ability to easily access five lane ends as Solar is designated up to Ruddle Lane east of the village. In essence we could have major problems with access.

BWMPC on behalf of residents of the communities adjoining and impacted by this proposed development, remain seriously concerned about the choice of location for Whitestone One and its sprawl, the selection process for this location and the widespread and potentially unknown impacts of the construction process and operation of the proposal. There is limited information on the impacts of solar generation and BESS at this scale and the detriment that such a development would ultimately cause. BWMPC does not believe that a mitigation strategy proposed by the applicant would be sufficient to negate the inevitable industrialisation of this secluded and ancient rural location with the loss of some of the great vistas in Doncaster.

For all of the above reasons Braithwell with Micklebring Parish Council supports it parish residents and other local residents and wishes to **oppose** the Whitestone One proposed application.

Yours sincerely

Di Hoyes

Parish Clerk on Behalf of Braithwell with Micklebring Parish Council

21st May 2025

For The Attention of Ms Emily Park
Environmental Advisor on behalf of the Secretary of State
The Planning Inspectorate Environmental Services Operations Group
3 Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Ms Park,

Planning Inspectorate Reference - EN0110020

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Whitestone Net Zero Ltd (the applicant) for an Order granting Development Consent for the Whitestone Solar Farm (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Bramley Parish Council has reviewed the information relating to the above application and scoping consultation and would like to make the following comments.

Request for Reduction in the size of the application

Role of Parish Council's as a consultee

NSIPs are large-scale developments that are considered nationally important. Despite their scale, they directly impact local communities, often in rural or semi-rural areas where parish councils operate.

- Parish councils provide valuable local detail that might otherwise be overlooked in national level decision-making.
- Their local knowledge can highlight issues that might not be evident to planning officials or developers.
- Their input helps ensure that localised environmental, social, and economic impacts are considered within a strategic national framework.
- Their unique strength lies in deep local knowledge—from flood risks and wildlife habitats to transport issues and cultural heritage. They represent the democratic

voice of small communities, making them vital to well informed planning decisions.

Volume of Parishes in one application

Bramley Parish Council is concerned about the scale of Whitestone Solar Farm Development.

Parish councils offer a critical grassroots perspective in planning, helping to protect local identity, environment, and community well-being. In the NSIPPS framework, their input is formally included but Council is concerned that the sheer volume of this project will diminish local input and the numerous parishes that this will impact will not have their individual knowledge heard.

Bramley Parish Council would like to understand how it might seek the equivalent of rule 6 status in relation to any hearing.

Difficulties if Navigating the NSIPPS Framework the size of Whitestone

Small parish councils operate with limited funds, part time clerks and volunteer councillors. In contrast, developers like Whitestone have a large legal and consultancy team preparing technical documentation. We are only at the start of the process and the document that we were asked to review and comment on is over 450 pages, making it difficult for small councils to respond effectively.

Cost rather than community driven

The proposed development is too large in scale for this area, and its different parts are spread across several boroughs that have little or no geographical or community connection. These locations do not form a coherent or natural site, and combining them into a single project seems more about convenience than reflecting the reality on the ground. Each area has its own distinct character, priorities, and local concerns, which risk being overlooked when treated as one large scheme. A development of this size and spread should be properly assessed in terms of its individual and cumulative impacts on the specific communities it affects.

Resources and Engagement

We are concerned that Rotherham Metropolitan Borough Council may not have the capacity and resources necessary to effectively deal with a project of this size alongside daily workload.

We would also like to see a clear commitment from the scheme promoter – Whitestone Net Zero Limited – to work closely with all consultees, statutory bodies, and directly

affected communities ahead of the statutory consultation. Recent communication about the application amendments was shared in an online session with two fixed dates. An appeal for additional sessions was refused.

Conclusion

Bramley Parish Council would respectfully ask the Planning Inspectorate to consider splitting this application into three separate applications, based on geography and local relevance. The current proposal spans a wide area and crosses multiple boroughs and parishes, each with its own local character, priorities, and planning context. Treating it as one large application makes it difficult for Parish Councils to fully understand and engage with the specific impacts relevant to their communities. Dividing the project into more manageable, clearly defined sections would allow for more meaningful consultation, better local scrutiny, and a fairer planning process for those most affected.

Council do not believe the areas are Geographically contiguous or logically connected, nor are they functionally interdependent, other than the fact that they feed into Brinsworth, they do not appear to rely on each other to operate. Parts of the proposed NSIP are located a considerable distance apart and adds to concerns about the lack of geographic cohesion in the application. From a local perspective, it feels less like a single, unified infrastructure project and more like a collection of separate developments being grouped under one umbrella. It is clear that our concerns about not being heard on such a vast development are shared by other Parishes, parishioners and community groups.

Scoping Document

Tourism

The scoping document appears to under-recognise the scale, nature, and economic value of tourism within the local and surrounding rural community. While tourism may not be characterised by largescale attractions, it plays a vital and often dispersed role in sustaining local businesses, employment, and rural services. Visitors are drawn to the area for its landscape, tranquillity, heritage, and recreational opportunities—factors that are particularly sensitive to the type and scale of development proposed.

The document fails to account for rural and community-based tourism, including day visitors, walkers, cyclists, wildlife enthusiasts, and those seeking heritage or cultural experiences. These forms of tourism are often informal and dispersed, yet collectively they contribute significantly to the local economy and quality of life.

Viewpoint

We note that the viewpoint map included in the scoping document appears to have been produced without a thorough understanding of the local landscape. It gives the impression of being desk-based, rather than informed by direct experience of the site and its surroundings. Given the rural nature of this area and the importance of visual impact in the assessment of this scheme, we would strongly encourage the developer to undertake more extensive on-site visits and field assessments. This would ensure that key viewpoints are properly identified, including those valued by the local community but not necessarily captured through desk-based mapping. A more comprehensive understanding of the site's topography, sightlines, and public vantage points is essential to produce a meaningful Landscape and Visual Impact Assessment (LVIA).

Lack of information

At this stage, we note that the precise location of key elements of the proposed infrastructure—such as the battery storage facility—has not yet been confirmed. Without this critical locational information, it is difficult to provide fully informed comments on the proposed scoping document. The absence of defined infrastructure locations limits our ability to assess potential environmental impacts, and the relevance or adequacy of the topics proposed for assessment.

Mental Health

Bramley Parish Council also wishes to raise the issue of potential impacts on mental health and wellbeing arising from changes to the visual environment. While the areas affected may not constitute formally accessible green space, the open rural landscape and natural views contribute significantly to the sense of place and quality of life for local residents. Public Health England's 2020 review, *Improving Access to Greenspace*, highlights that greener environments are associated with better mental health outcomes, including reduced levels of depression, anxiety, and fatigue, and enhanced quality of life for both children and adults. We believe this aspect warrants fuller consideration within the Environmental Impact Assessment.

Timescales

Looking ahead to the forthcoming stages of the process, we respectfully ask that consideration is given to the timeframes provided for Parish Councils to review and comment on future documentation. Unlike principal authorities, Parish Councils do not receive funding or technical support from the developer and we would hope to be given access to the reports instructed by RMBC when they become available. To ensure that local knowledge and community perspectives are properly reflected, we would welcome sufficient time being built into future consultation periods to allow Parish

Councils to access, understand, and respond to the documents. The sheer size of the area that these reports will cover could result in vital local information being omitted.

Summary

Overall, based in information provided to date, Bramley Parish Council is concerned that this development will destroy the character of large parts of our local and surrounding areas and so we want to be as engaged in the consideration of this application as possible.

In conclusion, Bramley Parish Council respectfully asks that the Planning Inspectorate to give full and proper consideration to the points raised in this letter. While we understand the national importance of infrastructure projects of this scale, the current approach of combining multiple geographically dispersed sites into a single application risks overlooking localised impacts, community identities, and specific planning contexts. It also compounds the resource issues that Parish Council's face when reviewing relevant documents. We therefore strongly urge that this project be broken down into three separate applications to ensure more effective consultation, clearer scrutiny, and a fairer planning process for each affected community.

Council believes that this approach would align more closely with the principles set out in the National Planning Policy Framework (NPPF), particularly around early and meaningful engagement, recognising distinct local character, addressing cumulative impacts, and promoting health and wellbeing. We believe a more locally responsive, transparent, and phased process is essential to ensure that small communities like ours are fully heard and represented in decisions that will affect our environment and way of life for many years to come.

Yours Sincerely,



Tricia Smith
Clerk and RFO, Bramley Parish Council

PINS Ref EN0110020

Our Ref IPP-252

16 May 2025

BY EMAIL ONLY WhitestoneSolarfarm@planninginspectorate.gov.uk

Whitestone Solar Farm – Scoping Consultation, response from the Canal & River Trust

Thank you for the above consultation on the Whitestone Solar Farm Project.

The Canal & River Trust are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.

The Trust are Landowner and Navigation Authority for the Chesterfield Canal. We also own and manage Harthill Reservoir and Broadbridge Dyke Feeder, which feeds the canal from the reservoir.

Due to the nature of the need for cable connections, we understand that a crossing of the Chesterfield Canal and of Broadbridge Dyke Feeder is proposed. The proposals also seek to construct new solar farms and associated substations in close proximity to Harthill Reservoir and Broadbridge Dyke Feeder.

Significantly, the Solar Farm north of Woodall and South of Kiveton Park includes Broadbridge Dyke Feeder. Another Solar Farm is proposed to the West and North of Harthill Reservoir, with the boundary extending in very close proximity to the dam wall.

We have reviewed the Scoping Report (including the Preliminary Environmental Impact Report) in addition to the existing plans, and wish to make the following comments on the proposals:

Impact on Harthill Reservoir

The site plan and other plans submitted alongside the Preliminary Environmental Impact Report show that the solar field in proximity to Harthill Reservoir would extend to include land to the immediate north of the reservoir dam structure. Recent works on Harthill Reservoir mean that **parts of this area are owned by the Trust and comprise of the main spillway channel from the Reservoir**. Any loss or damage to the spillway would remove the existing primary outfall from the reservoir, which would mean that significant additional works would be

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

required in order to provide for a safe outfall to ensure that water can flow from the structure safely. Without an appropriate spillway in position, the dam would be inoperable and would need to be drained. This would mean that water cannot be supplied to the Chesterfield Canal downstream, which could mean that the canal itself would become inoperable.

Due to the scale of the plans, we are unable to fully ascertain the likely impact of the works on the dam structure, or assess whether the spillway would be impacted by the works.

We have had communication from the applicant, and understand that the site boundary has been amended following a review of the spillway works and the altered land boundary on site. We have not yet had sight of this, and reserve the right to make additional comment on the revised details. **We wish to see the revised details in addition to the position of the spillway plotted so that we can fully ascertain that the risks to the spillway are appropriately managed.**

Construction works and loading from new structures associated with the solar farm have the potential to damage the reservoir structure. Most pertinent would be the risk of works undermining the dam structure to the north of the site. The reservoir is supported by a reinforced earthwork dam, and works at the base have the potential to undermine and/or destabilise this structure.

We request that, in the event of a future submission, appropriate stand offs should be provided to limit the potential for damage to the structure. **We recommend that the section of solar farm that wraps around the base of the dam structure should be removed from the submission.**

Biodiversity and Nature Conservation (Scoping Report Chapter 7)

Our waterways provide a potential habitat for waterborne species, potentially including amphibians, mammals (including otter), fish and waterborne plants. To help ensure that the impact on these species can be fully assessed, a future Environmental Impact Assessment should be informed by appropriate Biodiversity studies to help identify the presence of important habitats and species, and should incorporate appropriate mitigation measures.

In our review of the Scoping Report, we wish to highlight that our understanding is that the Chesterfield Canal Local Wildlife Site includes the section of the canal within the cable crossing corridor. We request that the promotor reviews this information to ensure that the EIA assessment is informed by correct up to date information. This may require amendments to the map shown in figure 7.8, and in table 7.2, where the canal is described as being 985m distant from the project, whereby it might actually be within the project boundary.

Within paragraph 7.3.38, the zone of influence for the badger surveys is not stated. We recommend that this should be clarified, and should include suitable habitat within the entire red-line boundary (including the cable route) and a 30m buffer.

Invertebrates and fish are not specifically mentioned within the scoping report, and not listed in table 7.3. Due to the interaction of the project with the Chesterfield Canal, where Horizontal Directional Drilling is proposed below the waterway, we would request that this is included and scoped into the assessment. As a minimum, we advise this should comprise of an assessment of the habitats likely to support notable assemblages with further detailed surveys undertaken as required.

7.4.1 describes the likely effects of the proposed development on biodiversity. We wish to highlight that directional drilling below the Chesterfield Canal could cause sediment discharges and problems arising from mud toxicity due to vibration below the watercourse. **We believe the impact should be included within any future**

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

Environmental Report and scoped in, with consideration given to the provision of field studies into invertebrates and fish species found in the water to assess the sensitivity of these species to potential sediment movement.

Landscape and Visual (Scoping Report Chapter 8)

The Chesterfield Canal and Harthill Reservoir are both recreational receptors, and we consider that they should be addressed in any future Landscape and Visual Impact Assessment (LVIA) designed to inform any future Environmental Assessment.

The Scoping Report indicates that the visual receptors likely to experience effects include recreational users of public rights of way (PRoW) and visitors to Harthill Reservoir, specifically noted as viewpoint VP50 and VP49. We therefore request that impacts on these assets should be fully explored in the LVIA.

After examining the map of views in the appendix (Figure 8.4 Preliminary ZTV - W3 - Study Area), it appears that VP50 is situated away from the reservoir itself and on a public right of way set back from the reservoir. VP49 is closer, but it's intended to capture impact on nearby residential properties and is sited strategically for this, rather than being specific for the reservoir's recreational uses on water and pathways.

As a result, we consider that VP50 is less suitable for assessing the visual impacts related to the walking pathways around the reservoir or the recreational activities on the water, particularly to the North of the reservoir, whereby there is an open view to the site proposal boundary in the adjoining field where the topography of the site ascends over the hedge line.

We therefore suggest that an additional viewpoint should be provided to capture open views towards the proposals from the northern area of the reservoir's water space and the north surrounding pathways.

Assessments of the impact on viewpoints during the winter months, where foliage will be less dense, should be considered, and we recommend that this is included within the final EIA. This would be pertinent for VP49, where the topography looks to ascend following the reservoirs adjoining parcel of woodland.

Paragraph 8.3.62 in the scoping report discusses whether or not visualisations will be included and states that this is subject to further discussions with stakeholders. I suggest that if they agree to a further viewpoint from the north of the reservoir, the review process will benefit from baseline and visualisation.

Ground Conditions and Land Quality (Scoping Report Chapter 10)

Disturbance of land in proximity to the canal, reservoir and associated watercourses should seek to avoid pollution to the water environment of these waterways which could be caused through unintentional runoff from exposed soils, or dust.

We have no significant issue with the content of this chapter of the scoping report. We consider that appropriate environmental aspects have been scoped into the EIA and the likely significant effects have been elaborately captured.

At this stage of the project we recognise that only a generic mitigation can be prescribed. The mitigation referred to from paragraph 10.4.3 is considered proportionate at this stage. As per paragraph 10.4.5, we note that a phase two investigation to be undertaken where these risks are deemed moderate or over during detailed design stage.

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

A CEMP could offer an appropriate measure to address direct risks to our network. We advise that dust prevention measures, and specific measures (such as trenches or hoarding) should be incorporated to reduce the risk of pollution towards the canal. **The Trust wish to review and provide comment on the outline CEMP once this is available to view.**

Water Resources and Flood Risk (Scoping Report Chapter 11)

Broadbridge Dyke feeder runs through one of the solar sites. Whilst Broadbridge Dyke is described in table 11.1, the description as being a watercourse that “flows from east to west” is not an accurate description of the feeder channel, and may refer to another watercourse. The feeder itself runs north-south from Harthill Reservoir to the Chesterfield Canal. It also runs through one of the solar farm sites. Please see figure 1 below for a map showing the location of the feeder channel.

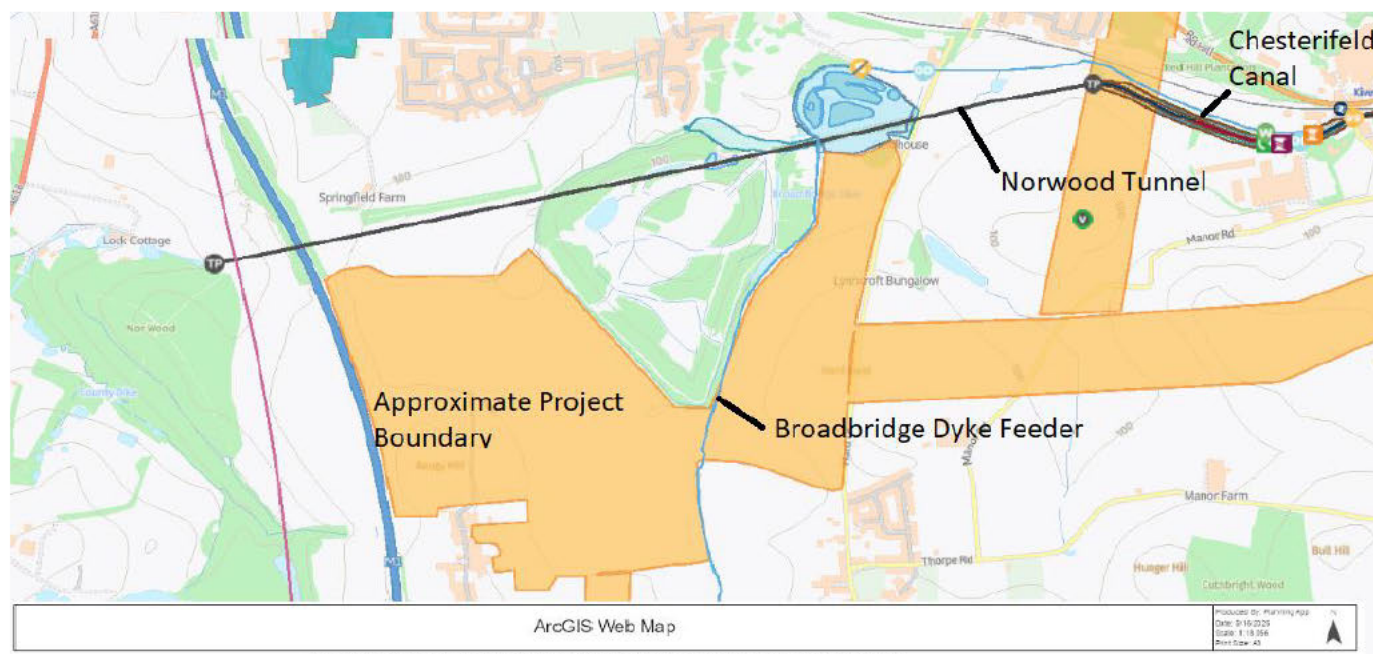


Figure 1 Map Showing the Location of Broadbridge Dyke Feeder and other Canal Assets north of Harthill Reservoir

The scoping report does not address impacts to the feeder, which could be impacted by works on site. As a result, we request that the final EIA seeks to address this in the assessment of impacts on water resources.

Water flows on Broadbridge Dyke Feeder can rapidly change depending on the level of wate flow from Harthill Reservoir. The promotor may wish to ensure that this is taken into account within the Flood Risk Assessment within EIA. The Trust would be happy to provide further information on our management of the feeder should this be of assistance to the promoter.

We have no significant issue with the identification of effects referred to in section 11.4. We would request, however, the impacts to the feeder channel are fully identified in addition to the Chesterfield Canal. We would wish for this to identify any change to runoff to the feeder and canal during and post development, as that any impacts can be fully assessed, and for this to be included within the Surface Water Drainage Strategy (SWDS) discussed in paragraph 11.4.7.

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

Safeguarding access to Broadbridge Dyke Feeder

Broadbridge Dyke Feeder runs through land identified to be used as one of the Solar Farms. The feeder provides water between Harthill Reservoir and the Chesterfield Canal. **It is important for the Trust to maintain access to the Dyke in order to allow us to carry out maintenance activities.** The construction schedule for the Solar Farm and the final layout of development should be designed to enable such access. Failure to safeguard this access could otherwise increase the risk of flooding from the Dyke Feeder should it become blocked, and could have an impact on the water management of Harthill Reservoir, which could have significant health and safety implications. We request that this discussion with regards to the retention of access is included in the EIA.

Noise and Vibration (Scoping Report Chapter 15)

We wish to highlight that works to install pipelines below our waterways, as suggested in the scoping document with regards to the Chesterfield Canal, would need to be carefully managed to avoid any significant vibration or loading that could adversely impact the stability of the canal above or Norwood tunnel in proximity to the works.

We request that methodology and associated risk mitigation details should be submitted prior to the commencement of development on site. We advise that this information should be incorporated into the EIA. In chapter 15 (in section 15.4), the existing scoping report highlights that Noise and Vibration assessments will focus upon impacts to sensitive receptors, such as residential property. We request that this should be expanded so that any risk to the banks of the Chesterfield Canal, including existing stone and piled wash walls are fully assessed. This should also incorporate an assessments of impact on Broadbridge Dyke Feeder should HDD works below this watercourse also be proposed.

Other Comments

Landowner Comments

Our consent as Navigation Authority and Landowner may be required for the installation of new cables across/below our waterways, including the Chesterfield Canal and Broadbridge Dyke Feeder.

Please note that the Canal & River Trust is a statutory undertaker which has specific duties to protect the waterways in addition to Harthill Reservoir. **Accordingly, it is likely that we will resist the use of compulsory powers which may affect our undertakings. Accordingly, we require that the acquisition of any rights over the canal should be secured by agreement.**

Landowner consent would be required from the Trust for the installation of a new cable below our assets. **The applicant is advised to contact the Trust's Utilities section at utilitiesenquiry@canalrivertrust.org.uk for further advice.**

In our capacity as landowner, we wish to advise that the applicant/landowner would likely be required to comply with the Trust's 'Code of Practice for Works affecting the Canal & River Trust' for the works shown. **The promotor is advised to contact the Canal & River Trust's Works Engineering Team via switchboard on 0303 040 4040 should they have any questions or require further information upon the Code.**

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

Protective Provisions

The Trust have a range of standard Protective Provisions that we would likely request are incorporated into any Future Development Consent Order. These would be consistent with other solar schemes with cable corridors affecting our network. These are designed to ensure for the protection of our waterways, and also can provide more certainty for the promotor during the creation of the Development Consent Order. **The Trust would be happy to share our standard provisions with the promotor. Should this be of interest to the promotor, they would be welcome to contact me on the details below.**

We hope the above comments are of use. If you have any questions or require further information, please feel free to contact me via the contact details below.

Yours Sincerely

Simon Tucker MRTPI
Area Planner



<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN
T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk



City of
Doncaster
Council

Environmental Impact Assessment Scoping Response

Project: Whitestone Solar Farm

Applicant: Whitestone Net Zero Ltd

Reference: EN0110020



1. Introduction:

- 1.1 This is a response from City of Doncaster Council (CDC) to the Environmental Impact Assessment (EIA) Scoping consultation by the Planning Inspectorate in respect of the Solar Scoping Report prepared by Environmental Resources Management Ltd (ERM) on behalf of Whitestone Net Zero Limited ('the Applicant'). The report relates to a proposed application for development consent under the Planning Act 2008 (hereafter referred to as 'the Application') for the construction, operation, maintenance, and decommissioning of the Whitestone Solar Farm (the Proposed Development).
- 1.2 The Proposed Development comprises the installation and operation of up to 750 Megawatts (MW) of solar photovoltaic (PV) generating modules and on-site energy storage facilities across a site in the administrative boundaries of City of Doncaster Council and Rotherham Metropolitan Borough Council.
- 1.3 The Site is situated within South Yorkshire, approximately 7 km and 5 km to the east of Sheffield and Rotherham respectively on approximately 1370 hectares (ha) of predominantly arable land that is within the Green Belt. The Site comprises three distinct sections:
 - Whitestone 1 (W1), located south of Conisbrough (centred on National Grid Reference (NGR) SK 505963)
 - Whitestone 2 (W2), located between Aston in the west and Dinnington in the east (centred on NGR SK 476874) and
 - Whitestone 3 (W3) located south of Wales and Kiveton Park (centred on NGR SK 481808).
- 1.4 It is only W1 that lies within the jurisdiction of CDC.
- 1.5 CDC understands that the Planning Inspectorate is seeking only views under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11 and that these views should not pertain to the relative merits or otherwise of the proposed development itself. Views are instead sought at this stage specifically on the scope and level of detail required for the Environmental Impact Assessment (EIA) and Environmental Statement that will accompany the Development Consent Order submission.

2. Key Issues:

- 2.1 The conclusions contained within the Main Scoping Report and associated appendices setting out those matters that should be scoped into the EIA are agreed.

- 2.2 Insofar as those matters proposed to be scoped out of the EIA, as set out at Appendix B of the Main Scoping Report, whilst CDC broadly accepts the conclusions reached, the following observations are made.

Cumulative Effects

- 2.3 CDC is conscious that a significant number of renewable energy projects are being proposed across the borough, resulting in significant impacts. There are other projects in the area which may become committed during the examination of this DCO application and thereby create effects that combine or interact with the Whitestone proposals. CDC considers it essential that the promoter's assessment of cumulative impacts includes all reasonably foreseeable projects.¹

Landscape and Visual Impacts:

- 2.4 Night-time effects during Construction, Operation and Decommissioning are proposed to be scoped out. The justification given for this being that any lighting during the Construction and Decommissioning phases would be *"minimal and temporary"* and that during the operational phase, there would be no continuous lighting. CDC would question this. Whilst the Construction phase will be temporary, this will still be ongoing for many months and lighting would undoubtedly be utilised for the duration of this period for reasons of health and safety and site security. Consideration should therefore be given to scoping this into the EIA.
- 2.5 At Appendix B of the Scoping Report under the subject of 'Landscape and Visual', CDC notes that landscapes subject to non-statutory/local landscape designations for the construction, operation and decommissioning phases are proposed to be scoped out. The reasons for this are given as 1) due to there being no local landscape designations within the study area; and 2) Landscape Character Areas that lie at the periphery of the study area or have no intervisibility or interconnectivity with the Site and there would be no or limited indirect adverse effect upon their character. The Site is contained within an area identified in the Doncaster Landscape Character and Capacity Assessment Study² as an 'Area of Special Landscape Value', which seeks to preserve the most highly valued landscapes of the Borough. These are indicators of landscape value, not character and were used to inform previous Unitary Development Plan 'UDP' policies at the time. Whilst the UDP has since been superseded by Doncaster's Local Plan (2021), Policy 33 of the Local Plan is a strategic landscape policy that references Doncaster's Landscape Character and Capacity Studies as being relevant (paragraph 10.54), which requires consideration to be given to development and landscape impacts.

¹ *R (Pearce) v Secretary of State for Business, Energy and Industrial Strategy* [2021] EWHC 326 (Admin)

² [Doncaster Landscape Character Assessment and Capacity Study - City of Doncaster Council](#)

CDC would therefore advise that consideration should be given to scoping in local landscape considerations as part of the EIA.

Socio-economic Impacts:

- 2.6 CDC would note at this stage that albeit any benefits in employment terms would be temporary in nature, opportunities to maximise utilising the local workforce, and maximising the socio-economic benefits of the scheme, should be fully explored via the EIA. In this respect, CDC would strongly encourage the Applicant to engage positively with Business Doncaster³ who are expertly placed to provide valuable insight into local markets. Through harnessing the local connections, intelligence and support networks that Business Doncaster has, we can ensure that the scheme achieves maximum output and added value in this respect.
- 2.7 This is particularly important given the location of the site close to the borough boundary creates risk of leakage to other areas in terms of employment opportunities and local supply chains. This should be factored into the EIA.

Glint and Glare:

- 2.8 CDC would make clear that Policy 58(B) of the Doncaster Local Plan (2021) sets out that in all cases low carbon and renewable energy proposals will be supported where they (inter alia) allow the continued safe and efficient operation of Doncaster Sheffield Airport. Since adoption of the DLP, the Doncaster Sheffield Airport has closed. Since then, reopening the airport has been a key strategic priority for the Council and continues to be, with a plan for passenger flights to resume in Spring 2026⁴. The re-opening of the Airport is one of the Council's top priorities⁵ and has local, regional and national implications. It is therefore imperative that the future successful operation of the Airport, once reopened, is not jeopardised. As such, the baseline for all relevant assessments within the ES should be undertaken with the airport as fully operational.

3. Concluding Remarks:

- 3.1 CDC would like to take the opportunity to strongly encourage the Applicant to continue to positively engage with it on all relevant technical matters as the Environmental Impact Assessment progresses.

³ [Business Doncaster - City of Doncaster Council](#)

⁴ [Doncaster Sheffield Airport Statements - City of Doncaster Council](#)

⁵ [CDC Document Title](#)

Conisbrough Parks Parish Council

Clerk and RFO to the Council:

Mr. P. Wilkinson
74 Spring Lane
Sprotbrough
Doncaster
South Yorkshire
DN5 7QL

email: [REDACTED]

Dear Planning Inspectorate

Your ref. ENO110020

Conisbrough Parks Parish Council submits the following comments regarding the application by Whitestone Net Zero Ltd for an Order granting Development Consent for the Whitestone Solar Farm.

The Parish Council fully supports and agrees with everything contained within the response made by the 'Save Our Green Belt' organisation dated 15th May 2025.

In addition, the Parish Council raises the following issues:

- The proposed development area is an outstanding natural agricultural green belt landscape.
- The area has been farmed for many years with dependency on food production (e.g. rapeseed, potatoes, barley, wheat, swedes and sugar beet) for the country. This area and its productivity needs preserving.
- The rural landscape is unsuitable for such largescale development with Clifton, the oldest established Conservation Village in Doncaster, surrounded by this proposed solar farm.
- The rural lanes and byways are extremely unsuitable for bringing in any infrastructure to build the solar farm, or indeed afterwards for quick access by emergency vehicles in the event of malfunction/overheating of battery storage, especially in view of the changing environmental climate issues.
- The rural lanes have frequent horse riders, movement of livestock, movement of agricultural machinery and these will be compromised by having to face the dangers of additional traffic.
- The increased flood risk in low lying areas. All the local brooks in Conisbrough Parks feed into Kersley Brook which flows through Conisbrough where properties have already been flooded numerous times over the years without the extra risk of run-off from the solar farm.

- The whole area of the proposed development has been identified in several City of Doncaster Council documents over the years, including The Doncaster Green Infrastructure Strategy 2014-2028 (Creating a greener, healthier and more attractive Borough), as being a significant rural landscape. It also has recorded historical characteristics and the Conisbrough Parks Parish Council has dedicated much time over the years in considering all proposals and planning applications in order to maintain and protect the character of the area.
- Clifton village and its immediate vicinity are used for rural pursuits and recreational activities such as dog walking, rambling, wildlife photography and bird watching. This was evidenced particularly in the recent Covid pandemic and should be preserved rather than eliminated by this proposed development.
- The area is full of history centred on Conisbrough Castle, and there is evidence of Roman occupation with the discovery of a Roman villa.
- There are concerns about the impact of a solar farm immediately adjacent to a water reed bed treatment plant that was installed to decrease the flooding potential on a feeder stream going into Kersley Brook.
- There are concerns regarding the impact of this largescale development on house and property valuations in the area. The scoping report should include research into this aspect.
- There are concerns regarding the likely increase in rural crime, including the theft or vandalism of metal fencing, the theft of cabling, the theft of CCTV equipment and the theft or vandalism of the solar panels themselves. The scoping report should address this.
- The Parish Council requests further information regarding the size and number of solar panels, the proposed acreage of the Whitestone One site, where the battery storage units are intended to be located and the route of the cabling.

The scale of this proposed development encompasses a vast proportion of the Conisbrough Parks Parish Council area and will obliterate the character and heritage of this beautiful location.

Yours faithfully.

Peter Wilkinson
Clerk to Conisbrough Parks Parish Council



EAST RIDING

OF YORKSHIRE COUNCIL

County Hall Beverley East Riding of Yorkshire HU17 9BA Telephone (01482) 393939

www.eastriding.gov.uk

Stephen Hunt Director of Planning and Development Management

Environmental Services
Operations Group 3
Temple Quay House
2 The Square Bristol
BS1 6PN

Your Ref: EN0110020

Enquiries to: Rachael Hodgson

E-Mail: [REDACTED]

Date: 30th April 2025

Email: WhitestoneSolarfarm@planninginspectorate.gov.uk

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Whitestone Net Zero Ltd (the applicant) for an Order granting Development Consent for the Whitestone Solar Farm (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Thank you for consulting the East Riding of Yorkshire Council on the above. I can confirm that East Riding of Yorkshire Council do not have any comments to make on the applicants proposed scope of the ES as set out in their Scoping Report.

Yours sincerely

[REDACTED]
Stephen Hunt MRTPI
Director of Planning and Development Management

Ms Emily Park
Infrastructure Planning Commission
Temple Quay House
(2 The Square)
Temple Quay
Bristol
Avon
BS1 6PN

Our ref: XA/2025/100253/05-L01
Your ref: EN0110020
Date: 20 May 2025

Dear Ms Park

**PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE
PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2017 (THE EIA REGULATIONS) – REGULATIONS 10 AND 1**

WHITESTONE SOLAR FARM, SOUTH YORKSHIRE

Thank you for referring the above scoping consultation for comment on 24 April 2025.

The Environment Agency has reviewed the *EIA Scoping Report: Whitestone Solar Farm referenced EN0110020, Dated: April 2025 (Revision 03)*.

We have the following comments to make regarding the proposed scope of the Environmental Statement (ES).

There are currently topics proposed to be scoped out, which we consider should be scoped in:

- Fish and Aquatic Ecology
- Potable and wastewater supplies
- Contaminated Soil and Unstable Ground Conditions

There is also legislation not currently identified within the Scoping Report which should be considered within the ES:

- The Salmon and Freshwater Fisheries Act 1975
- The Eels (England and Wales) Regulations 2009
- Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations

Further details on these key points are provided below.

We have also provided additional advice to the applicant on how the various elements of the ES should be assessed in order to support their drafting of the ES, in addition to contextual data on historic landfills within the area. This advice and information is contained within appendices for ease of navigation.

Appendix A – Flood Risk

Appendix B – Aquatic Ecology

Appendix C – Ground and Water Resources

Appendix D – Historic Landfills

Document Reference(s): Chapter 7 Biodiversity and Nature Conservation; 7.3.15	
Issue	There has been no assessment of fish and aquatic ecology at all within this scoping report and none is proposed. Table 7.3 does not include any reference to fish or aquatic ecology (beyond otters and watervoles) being scoped in or out, therefore we assume it is not within the proposed scope. The report acknowledges that there is suitable habitat in the form of watercourses on site and adjacent to the draft order limits.
Impact	The proposal risks causing direct harm to fish and aquatic species, or harm to their habitat through sedimentation, electromagnetic fields, light pollution, construction noise and vibration, and from watercourse crossings. This may also lead to a deterioration in WFD status.
Solution	Fish and aquatic ecology should be scoped into the EIA in the absence of any supporting evidence to demonstrate that they are either not present or will not be impacted. Baseline data should be obtained through a desk study (including EA fish population data) and field surveys. Impact-pathways should be identified and assessed in the EIA, which should include (but not limited to): • impacts on fish from Electro-magnetic fields where high

	voltage cables pass underwater watercourses • impacts from noise and vibration associated with construction • impacts from pollution and increased sedimentation • impacts from open cut crossing of watercourses and potential loss or damage to habitat • Impacts from light pollution on watercourses and aquatic ecology
Additional narrative/ explanation (if necessary) The cable route crosses part of the River Rother. The Rother has a notable fish population including barbel (<i>Barbus barbus</i>), brown/sea trout (<i>Salmo trutta</i>) and bullhead (<i>Cottus gobio</i>). European eel (<i>Anguilla anguilla</i>), may also be present in watercourses.	

Document & chapter: 11.5.13 and 11.6.28	
Issue	Potable and wastewater supplies has been scoped out of the ES, however it is currently unclear what the alternative solution is, and if this is viable. Sources of fresh water and disposal of wastewater have not been adequately assessed, therefore it is unknown at this stage whether it is viable to state existing potable water networks will not be used, as currently proposed.
Impact	Alternative sources of water such as groundwater or surface water abstraction and disposal may require specific permits or exemptions which may not be granted. Obtaining and removing water via tanker may have significant environmental impacts needing to be considered within the ES. It is possible that these sources of water are not viable.
Solution	Water supply and disposal should be scoped in, and a basic water management strategy undertaken. The assessment should provide an

	options appraisal of volumes and sources of supply and disposal available to the site so that any practical or environmental constraints can be problem solved as early in the planning process as possible and any permitting requirements can be identified in good time of commencement.
Additional dialogue / commentary: In 11.5.13 it states: “wastewater will be ... disposed of using temporary measures without the need to connect to existing potable and wastewater networks”. But in 11.6.2 it states: “At the time of writing the method for wastewater discharge and management is not yet confirmed.” Consumptive uses of water described in the report include (but are not limited to) dust suppression; potable/domestic supply for welfare stations/laydown areas; wheel/concrete washing; bentonite clay mixing and drilling fluids for HDD.	

Document & chapter: Table 10.1 (Scoping – Ground Conditions and Land Quality)	
Issue	Effects of the development on Contaminated Soil and Unstable Ground Conditions is proposed to be scoped out, without supporting evidence in the form of a Phase 1 Desk Study. Government guidance on EIA scoping for solar farms indicates supporting evidence in the form of a desk-based assessment of hydrogeology and historical land uses should be submitted as a minimum to scope this matter out.
Impact	The proposal poses residual risks to underlying controlled waters through the disturbance of historical land contamination and creation of a preferential pathway to underlying aquifers. This could result in groundwater contamination and WFD failure.
Solution	In the absence of information to demonstrate these risks are understood and can be managed, contaminated land should be scoped in for construction, operation and decommissioning phases.

	Siting and construction of the BESS and other infrastructure are not mentioned. We recommend these are scoped in, in addition to solar arrays and substations.
Additional dialogue / commentary: Reference should be made to Solar Scoping Table 2 .odt Construction and operation on possible BMV land is scoped in, but other land is not mentioned. We would expect all land to be scoped in until further assessment (such as the desk study) is completed. Risks to land cannot be ruled out until the current setting is determined. Effects of construction on Contaminated Soil and Unstable Ground Conditions is proposed to be scoped out, with the Phase 1 and Phase 2 investigations cited as being sufficient to “ensure no potential significant effects are likely”. The Phase 1 report is an assessment of the site setting and hazards but cannot itself serve to eliminate risks. Given the absence of geological information supplied to date, the industrial history of the region, and the presence of numerous areas of potential land contamination within the study area, we require that contaminated land is scoped in until further assessment is made. Effects of land contamination on Operation and Decommissioning are not mentioned. Existing contamination could be disturbed during maintenance and decommissioning. Contaminated land could affect subsurface cables and infrastructure during the life of the project if not identified and mitigated. We are pleased to see effects of cable heat during Operation are scoped in.	

Document Reference(s): Chapter 7 Biodiversity and Nature Conservation; 7.2	
Issue	The Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales) Regulations 2009 have not been included in the list of legislation that is relevant to biodiversity.
Impact	The legal responsibility on the developer pertaining to this fish specific legislation has not been acknowledged or addressed. This infers that the impacts on fish from the construction, operation and decommissioning have not been fully considered.
Solution	Both pieces of legislation should be listed as relevant in the biodiversity

	chapter of the ES and their impacts addressed within the assessment.
Additional narrative/ explanation (if necessary) Parts of The Salmon and Freshwater Fisheries Act 1975 relevant to this type of development and that should be considered, are (but not exhaustive) Part 1, Sections 2 and 4. Parts of The Eels (England and Wales) Regulations 2009 relevant to this type of development and that should be considered, are (but not exhaustive) Part 4.	

Document Reference: Chapter 7, Biodiversity & Nature Conservation	
Section Reference: Section 7.2.1	
Issue	Environmental legislation does not list some recent (2024) legislation pertaining to BNG.
Impact	Risk of not complying with current legislation, by not considering new environmental definitions such as 'irreplaceable habitat', along with related offences to said habitats.
Solution	Please include the following legislation, policy and guidance: Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, for completeness.

We hope you find this advice helpful, if you have any queries please do not hesitate to contact me.

Yours sincerely

Mrs Jane Field
Planning Specialist

Nlteam@environment-agency.gov.uk

Appendix A – Flood Risk

Document Reference(s): Chapter 11: Water Resources and Flood Risk. Para 11.3.13 & Para 11.5.9	
Issue	It is confirmed that no built infrastructure will be located within Flood Zone 3b, however 3b is referred to as the 5% AEP event. Following changes to the classification of Flood Zone 3b, this is now incorrect and should refer to the 3.3% AEP or the 1 in 30 year flood event.
Impact	Use of this incorrect reference description of Flood Zone 3b will lead to an inaccurate assessment of the extent of functional floodplain affecting the site, resulting in unacceptable development in areas of significant flood risk.
Solution	Reference and assessment of Flood Zone 3b should be updated, along with the assessed impact on the development site and layout.
Additional narrative/ explanation (if necessary)	

Document Reference(s): Chapter 11: Water Resources and Flood Risk. Para 11.5.12	
Issue	Despite Para 11.5.9 stating that the sequential approach to layout in the floodplain will be applied, it is ambiguous if this extends to steering all development to the land at lowest risk of flooding, or if it is intended only to locate the various elements of the development appropriate to the flood zone.
Impact	In accordance with National Planning Policy Framework and the sequential test (paragraph 168), development should apply a sequential, risk based approach to the location of development, taking into account all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property.
Solution	The FRA should demonstrate how the scheme has located development on

	the land at lowest risk of flooding possible. If there are any opportunities for development to be located outside of Flood Zones 2 and 3 and into flood zone 1, this should be prioritised.
Additional narrative/ explanation (if necessary) We note that it is confirmed that all critical electrical infrastructure is proposed to be located within Flood Zone 1, and that where infrastructure is located within Flood Zones 2 and 3 the FRA will include the application of the Sequential and Exception Tests.	

Document Reference(s): Chapter 11: Water Resources and Flood Risk. Para 11.5.7	
Issue	Appropriate climate change criteria is unable to be ascertained because although the vulnerability classification has been confirmed as Essential Infrastructure, the development's lifetime has not been stated.
Impact	Flood risk into the future may adversely affect the operation of the site because the impacts of climate change have not been correctly assessed and mitigated for.
Solution	In the absence of a proposed lifespan a climate change assessment should use the 2080's epoch with a credible maximum allowance and relevant climate change impacts should be assessed within the FRA.
Additional narrative/ explanation (if necessary) When planning for non-residential development, it is appropriate to assume a development lifetime of at least 75 years. The credible maximum climate change scenario for fluvial watercourses is covered by the Upper End allowance.	

Document Reference(s): Chapter 11: Water Resources and Flood Risk. Para 11.5.10	
Issue	It is stated that PV panels in the floodplain would not require floodplain compensation.
Impact	Although it is proposed to install the arrays on narrow pile-driven supports

	there still could be a loss of floodplain as a result of the arrays. If this is not assessed and mitigated for the scheme could result in a loss of flood capacity and an increase in flood risk. An increase in flood risk is contrary to planning policy.
Solution	Once the extent of development within the design flood extent has been established, an assessment of the impact should be included within the FRA. This will need to consider impacts to both flood depth and extents, and flood flow routes.
Additional narrative/ explanation (if necessary)	

Appendix B – Aquatic Ecology

Document Reference(s): Chapter 3 The Proposed Development para 3.4 & 3.5.23	
Issue	We welcome the proposal to consider trenchless watercourse crossings for on-site cabling options, but it is unclear how crossings and cabling will be approached for the inter-site and export cable routes. The intention to avoid crossings where possible, is noted.
Impact	Inappropriate cable burial methods, especially across watercourses, can damage or weaken both watercourse channel and beds resulting in detrimental changes to erosion, deposition, meander migration processes.
Solution	Trenchless techniques should be used across the scheme as a preference to other methods to reduce the need for secondary mitigation. Crossing locations should be steered to existing crossing points, e.g. open span bridges, where possible.
Additional narrative/ explanation (if necessary)	

Document Reference(s): Chapter 3, The Proposed Development Para. 3.5.39	
Issue	The applicant acknowledges that DEFRA guidelines outline the minimum provision of 10% BNG for smaller developments; but has not specified what BNG target the project will aim to provide.
Impact	By refusing to commit to BNG early in the project and planning suitable assessments, the scheme runs the risk of needing to retrofit later in the scheme design or when resources may not be available, risking meeting the requirements.
Solution	The scheme should commit to delivering at least 10% BNG. Consideration should be given to undertaking River Condition Assessments now and using the Watercourse Metric to calculate the

	watercourse baseline, which will inform the delivery of enhancement and mitigation to watercourse habitats. For potential biodiversity net gain opportunities, we recommend the applicant refers to both the mitigation measures within the Water Framework Directive and opportunities identified within the Local Nature Recovery Strategy.
Additional narrative/ explanation (if necessary) Although BNG has not yet become a legal requirement for NSIPs, the guidelines will likely require developers to achieve a minimum of 10% BNG. Delivery of BNG is now also best practice, and many NSIPs have committed to deliver BNG prior to the release of government guidelines.	

Document Reference: EIA Scoping Report: Chapter 3, The Proposed Development	
Section Reference: Section 3.6.1	
Issue	Further species surveys have been proposed to establish a baseline (Chapter 7, Section 7.3.45), however pre-construction surveys do not appear to be planned for otters and water voles. Construction is anticipated to take place over a 2 year period between 2027 and 2029
Impact	CIEEM's Advice Note 'On the lifespan of ecological reports & surveys' states that species survey data may be out of date around 12-18 months following a survey. Changes may occur in species presence and distribution between baseline surveys being undertaken and construction occurring. Otters are highly transitory species, therefore an otter could construct a holt prior to, or during construction. This may result in damage or destruction of holts or disturbance during construction, which are offences under the Conservation of Habitats and Species Regulations 2017 (as amended).

Solution	Riparian mammal pre-construction checks/surveys should be conducted prior to construction near watercourses and prior to laying of cables near or under watercourses, to determine any changes in presence or distribution of otters and water voles.
-----------------	---

Document Reference: EIA Scoping Report: Chapter 3, The Proposed Development	
Section Reference: Section 3.6.9	
Issue	We note that INNS is scoped in, however it is currently unclear how INNS will be assessed within the ES.
Impact	Lack of INNS and biosecurity planning can lead to accidental spread, which is an offence under the Wildlife and Countryside Act 1981.
Solution	Given INNS have been identified as present within the site and within close proximity of the boundary, an INNS Management Plan should be undertaken. A pathway specific risk assessment should be considered identifying any pathways for spread during construction, operation and decommissioning. A strict and robust Biosecurity Plan must also be submitted within the Environment Statement, or alternatively, biosecurity measures could be incorporated within the INNS management plan. Where the presence of INNS has been identified, a specific method statements for the INNS species identified (and the locations within which they are present) could be produced, along with specific measures to be implemented during construction works and/or vegetation and soil removal to ensure that there is no spread of INNS. Known locations of INNS could be marked on the site and vehicle movements restricted in the vicinity of

	these locations until the INNS have been appropriately removed or treated.
Document Reference: Chapter 11, Water Resources and Flood Risk	
Section Reference: Section 11.4.1	
Issue	The Section mentions the possibility of installing culverts during the construction phase to facilitate access over watercourses.
Impact	Culverts have the potential to fragment habitats and reduces connectivity, making dispersal and commuting for some species difficult. Culverts also put an added pressure on otters during periods of high water-levels, as culverts offer little room for conveyance and put otters at risk of being killed when crossing roads. Culverts restrict flow, interfere with sediment transport pathways and may cause harm to channel morphology.
Solution	Should any access tracks cross watercourses or ditches, we would expect to see open-span bridge design. Box/piped culvert crossings, even those appropriately designed, are a structure of last resort. If existing culverted crossings require upgrading for access purposes, consider replacing with open span structures, or 3-sided/arched culverts that do not interfere with the channel bed.

Appendix C – Ground and Water Resources

Document & chapter: 10.3.4	
Issue	The scope of the proposed Phase 1 Desk Study (currently scoped Out of the ES) is insufficient in that it states: <i>“A targeted walkover of areas of interest may be undertaken as part of the assessment if the desk-based review indicates that this is necessary”</i>. In line with LCRM and BS10175 We consider a walkover or reconnaissance to be a fundamental part of the desk study.
Impact	Visual evidence of historical land use and potential contamination can be missed if no physical site visit is undertaken, resulting in contamination of underlying aquifers as a result.
Solution	In addition to scoping in contaminated land risks (as above) the Phase 1 Desk Study should include a site walkover of the area. Please refer to additional comments advice in this section on what the Desk Study should include in order to ensure all risks are identified and assessed correctly.
Additional dialogue / commentary: Environment Agency LCRM guidance states: “To complete a preliminary risk assessment you need to ... do a desk study and site walkover.” We note that in 11.6.27 it states: “A walkover survey will be completed to ground truth the desk-based study,” albeit this section relates to water and not land contamination.	

Document & chapter: Main Report Chapters 10 and 11	
Issue	Although 10.3.7 states: “receptors considered within the Study Area will include ... designated Principal and Secondary Aquifers”, this information does not appear to be included within the scoping report.
Impact	If aquifer classification is not assessed, risks to groundwaters cannot be fully

	assessed or mitigated.
Solution	It must be ensured that the geological setting is fully considered in the Phase 1 environmental desk study, and other relevant documents.
Additional dialogue / commentary: We are pleased to see that Source Protection Zones are noted in 11.3.6 and shown in figures 11.16 to 11.18.	

Document & chapter: Main Report Chapter 10 and 11	
Issue	There does not appear to be any consideration of groundwater springs within the report. It is understood they are possible, especially in the region of Brampton Common.
Impact	Shallow groundwater may pose issues for construction, especially if not planned for. Springs are vulnerable to contamination without adequate pollution prevention controls and therefore could be polluted as a result of not being fully considered.
Solution	Ensure shallow groundwater, including the location and impacts on springs, is considered in detail in subsequent reports, including the Phase 1 environmental desk study.
Additional dialogue / commentary: We are pleased to note that groundwater interflow patterns, including dewatering, is scoped in. <u>Information about environmental permits</u> If dewatering is required, it will require an abstraction licence if it doesn't meet the criteria for exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works . It may also require a discharge permit if it falls outside of our regulatory position statement for de-watering discharges . If the applicant does not meet the exemption and requires a full abstraction licence, applicants should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on our website: Abstraction licensing strategies (CAMS process) and Apply for a water abstraction or impounding licence . If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.	

Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

Temporary dewatering of wholly or mainly rainwater that has accumulated in an excavation may be exempt from an [Environmental Permit for a Water Discharge Activity](#). Note that this does not permit discharge of groundwater from a passive or active dewatering activity or permit the abstraction of groundwater.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found in our [environmental permits guidance](#).

The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

Document & chapter: Main Report 10.3.5	
Issue	A search buffer of 100m has been used for ground conditions. We consider this buffer to be too small.
Impact	Sensitive receptors, or potential off-site sources of significant contamination may be overlooked.
Solution	Consider using a larger buffer for the Phase 1 environmental desk study.
Additional dialogue / commentary: Justification for using 100m is not given other than "professional judgement". NHBC guidance advises a buffer of 250m. While this guidance applies to housing schemes, we consider it a reasonable buffer for all sites. As a minimum, we expect that landfills, COMAH sites, and other large industry within 250m should be considered.	

Document & chapter: Main Report 10.3.18 and 10.3.19	
Issue	The overview of permitted sites and historical landfills presented is currently insufficient. We have records of other landfills near the site which are not discussed within this table.
Impact	Interactions with nearby industrial sites and waste sites may not be adequately assessed. Resulting in water pollution occurring.
Solution	Ensure a detailed review and assessment of active and historical landfills is included in the Phase 1 environmental desk study, and other relevant documents.

	Please see Appendix D for information on historic landfills.
Additional dialogue / commentary: The waste sites described are broadly consistent with our records, but we have records for which there is no comment in the report. Of particular note is Maltby Brickworks Quarry, which is intersected by the proposed cable route west of Maltby. The nature of material used to infill railway cuttings mentioned should be further assessed as our records indicate this was not wholly inert material. The Hellaby Landfill received multiple waste types and appears more than just the railway cutting noted in the report. Excavation through historical landfills will require additional controls and permissions. These must be confirmed and obtained early in the process to avoid potential delays during construction. We recommend early communication with the Environment Agency's National Permitting Service. A COMAH site at postcode S66 8QD is adjacent to the cable corridor but not mentioned in the report.	

Document & chapter: Main Report 10.4.6	
Issue	The potential re-use of non-hazardous materials during construction is referenced. The proposed procedure for unexpected contamination in the summary of oCEMP is insufficient.
Impact	This method may not be sufficient to remove an unacceptable risk to land and controlled waters. Soil removal as proposed may require a permit or exemption under the Environmental Permitting regulations, and this must be obtained prior to works; this is not detailed in the procedure.
Solution	The oCEMP when drafted should ensure this issue is fully covered in order to mitigate risks. Further discussions should be sought regarding this topic if there is any confusion.
Additional dialogue / commentary: In 10.4.6 it states: "Potentially contaminated made ground will be quantified prior to removal from excavations; and Advice will be sought by an environmental specialist should materials suspected of being contaminated be uncovered." Note that material excavated from historic or active landfill sites must be handled as waste, even where there is no evidence of contamination.	

A sampling plan will need to be in place to demonstrate non-hazardous properties, particularly if classified using mirror codes or end of waste criteria, for example soil and stones.

Please ensure all duty of care is considered when classifying and moving waste:

<https://www.gov.uk/government/publications/waste-duty-of-care-code-of-practice/waste-duty-of-care-code-of-practice>

If you plan to store, use, treat or dispose of waste materials produced on site, environmental permitting regulations need to be considered. In the possibility of a permit being required, it is advised that this is applied for ahead of time to avoid delays. If you require any assistance with the application process for a permit, this can be obtained here:

<https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

We suggest the following procedure:

- *If contaminated material, including groundwater, is found at any time when carrying out the authorised development, which was not previously assessed in the environmental statement or a risk assessment, the undertaker must cease works in the vicinity of that contamination and undertake a risk assessment of the contamination in consultation with the Environment Agency and relevant planning authority.*
- *Where the undertaker determines that remediation is necessary, a written scheme and programme for the remedial measures to be undertaken must be submitted to and approved in writing by the relevant planning authority following consultation with the Environment Agency.*
- *Remedial measures must be carried out in accordance with the scheme approved, and a verification report following completion of those remediation works must be submitted to relevant planning authority for approval, following consultation with the Environment Agency.*

Document & chapter: 3.5.17 and figures

Issue	We welcome the chemical contamination risks of the BESS being scoped in, however note that the indicate locations for the BESS have not yet been finalised. Factors identified which should be considered when locating the BESS do not include sensitivity of the water and groundwater environment. Primary mitigation in terms of location does not appear to be considered.
Impact	The BESS site may pose an unacceptable risk to land and controlled waters if sited in an unsuitable location without adequate pollution prevention controls.

Solution	Vulnerability of the water environment should be considered when choosing the final location of the BESS. As a minimum, the worst-case scenario should be assessed when designing mitigation in case of siting in a sensitive location.
Additional dialogue / commentary: When siting the BESS, geology and drainage should be considered. We are pleased to note reference to battery fire 11.4.2, and that fire water is scoped in (Table 11.4). We also note that all BESS and Substations will be located within Flood Zone 1 (11.5.11). Consideration must be given to suitable disposal of firewater captured within the BESS drainage system after a fire event.	

Document & chapter: Main Report 10.2.1 and 11.2.27*
Point for consideration: We also recommend reference to the EA's Groundwater protection position statements. <i>* Report numbering is not consistent in this section. This comment relates to the list under the heading National Guidance after the first occurrence of Section 11.2.27.</i>

Document & chapter: Main Report 10.5.6
Point for consideration: It states that the oCEMP and oEMMP “will be developed to mitigate residual impacts ... for each of the construction, operation and decommissioning phases”. Based on the information supplied, the CEMP does not appear to be designed for the operation or decommissioning phases. Suggest the OEMP and DEMP would be more suitable.

Appendix D – Historic Landfills

Historic Landfills located near to Whitestone 3 (W3)

1. Site name: Woodall Road

Site address: High Moor, Killamarsh

Site operator name: Parsons Group (High Moor) Limited

Site operators address

NGR: SK 446900 380200

Licence issue date: 11 Aug 1982

Licence surrender date: 30 Apr 1994

Date of first input: 31 Dec 1982

Date of last input: 31 Dec 1987

Inert waste deposited: Yes

Industrial waste deposited: Yes

2. Site name: Railway Cutting

Site address: Off Mansfield Road, Norwood

Site operator name: Mr W Richardson

NGR: SK 447500 382000

Date of first input: 31 Dec 1969, 01:00

Date of last input: 31 Dec 1976, 00:00

Inert waste deposited: Yes

Industrial waste deposited: Yes

3. Site name: Disused Tip, Kiveton Park, Chesterfield Canal

Site address: Colliery Site, Kiveton Park, Sheffield, Rotherham

NGR: SK 449000 382400

Waste comments: Silt and dredgings.

Historic Landfills near Whitestone 2 (W2).

1. Site name: Land off Pleasley Road

Site address: Guilthwaite Common, Sheffield

Site operator name: Rotherham Metropolitan Borough Council

NGR: SK 445100 388100

Date of first input: 31 Dec 1952

Inert waste deposited: Yes

Waste comments: Excavation

2. Site name: Blackmoor Quarry

Site address: Reservoir Road, Green Lane, Ulley, Rotherham

Site operator name: Harrison Quarries

NGR: SK 445800 387600

Licence issue date: 18 Feb 1986

Licence surrender date: 28 Apr 1994

Date of first input: 18 Feb 1986

Date of last input: 28 Apr 1994

Industrial waste deposited: Yes

Waste comments: Solid, non-hazardous industrial waste

3. Site name: Brampton Straight Mile

Site address: Common Road, Near Brampton, Thurgroft, Rotherham

NGR: SK 449700 386100

Licence issue date: 18 Feb 1986

Licence surrender date: 31 Aug 1987

Waste comments: building rubble, excavation waste, soil and sub-soil. All waste at the site shall be solid and non-hazardous.

4. Site name: Todwick Road Industrial Estate

Site address: Todwick Road Industrial Estate, Dinnington

Site operator name: J F Kirkham, County Engineer, South Yorkshire County Council

Site operators address: County Hall, Barnsley

NGR: SK 450800 386100

Licence issue date: 1 Jul 1981

Licence surrender date: 31 Dec 1990

Date of first input: 1 Jul 1981

Date of last input: 31 Dec 1990

Waste comments: Demolition, excavation

5. Site name: Old Brickworks

Site address: Old Brickworks, Todwick Road, Dinnington

Site operator name: C F Booth Limited

Site operators address: Armer Street, Rotherham

NGR: SK 451000 386500

Licence issue date: 20 Dec 1977

Licence surrender date: 15 May 1980

Date of first input: 20 Dec 1977

Date of last input: 15 May 1980

Inert waste deposited: Yes

Industrial waste deposited: Yes

Commercial waste deposited: Yes

Household waste deposited: Yes

Waste comments: Construction waste

6. Site name: Bantry Road

Site address: Bramley, Rotherham, South Yorkshire

Site operator name: Rotherham Rural District Council

NGR: SK 449500 392600

Date of first input: 31 Dec 1949

Inert waste deposited: Yes

Industrial waste deposited: Yes

Commercial waste deposited: Yes

Household waste deposited: Yes

Liquid sludge deposited: Yes

Waste comments: Sewage sludge

7. Site name: Land Off Quarrieside Lane

Site address: Wickersley

NGR: SK 447800 390900
Household waste deposited: Yes

Authorised Landfill near Whitestone 2 (W2)

1. Site name: Thurcroft Landfill

Site street: Kingsforth Lane
Site area: Thurcroft
Site town: Rotherham
Site postcode: S66 9AB
Licence type description: Waste Landfilling; >10 T/D With Capacity >25,000T
Excluding Inert Waste - 5.2 A(1) a)
NGR: SK 50189033 450180 390330
Date issued: 20 Dec 2018
EPR licence number: EPR/CP3936QK

This site does not fall under the Yorkshire Landfill Team and therefore the appropriate team would be able to provide further comment.

Historic Landfills near Whitestone 1 (W1)

1. Site name: Landfill Site / Disused Railway Cutting

Site address: Off Common Lane, Conisbrough, Doncaster
NGR SK 451500 397100
Licence issue date: 9 Feb 1983
Licence surrender date: 29 Apr 1994
Date of first input: 9 Feb 1983
Date of last input: 29 Apr 1994
Inert waste deposited: Yes
Industrial waste deposited: Yes
Commercial waste deposited: Yes
Special waste deposited: Yes
Liquid sludge deposited: Yes
Waste comments: Non-hazardous waste from building/demolition and excavation operations, Non-hazardous solid industrial waste, non hazardous, non-flammabel sludges, fume extraction sludges/dust, Iron hydroxide sludge. Category 2 wastes.

2. Site name: Kearsley Lane

Site address: Conisbrough
NGR: SK 451000 397900

3. Site name: Ashfield Quarry / Ashfield Brickworks (Brickpits) / Conisborough Tip Site

Site address: St Clifton Hill, Conisbrough, Doncaster
NGR: SK 451400 398200
Licence issue date: 14 Nov 1984
Licence surrender date: 22 Mar 1996
Date of first input: 14 Nov 1984
Inert waste deposited: Yes

Industrial waste deposited: Yes
Commercial waste deposited: Yes
Household waste deposited: Yes
Special waste deposited: Yes
Liquid sludge deposited: Yes

4. Site name: Railway Cutting

Site address: Crookhill Road, Conisbrough, South Yorkshire

Site operator name: Conisbrough Urban District Council

NGR: SK 452000 398100

Licence issue date: 17 Nov 1976

Licence surrender date: 11 Mar 1993

Date of first input: 31 Mar 1973

Industrial waste deposited: Yes

Commercial waste deposited: Yes

Household waste deposited: Yes

Liquid sludge deposited: Yes

Waste comments: Waste category 2. Slag, boiler and flue cleanings, silt, dredgings, metal scrap, scrap rubber, contaminated rubbish, empty used cleaners, industrial effluent treatment sludge, sediment filter materials, tar, pitch, bitumen, paint waste, treated timber

Waste comments: Waste category 3. Non-hazardous industrial, construction, neutralised metal hydroxide sludge, fume extraction residues, non-hazardous commercial, non-hazardous household waste

5. Site name: Hellaby Landfill

Site address: Ravenfield, Rotehrham, South Yorkshire

NGR: SK 450500 394100

Licence issue date: 17 Nov 1976

Date of first input: 31 Dec 1973

Date of last input: 31 Dec 1979

Industrial waste deposited: Yes

Commercial waste deposited: Yes

Household waste deposited: Yes

Liquid sludge deposited: Yes

Waste comments: Agricultural, commercial, slag and boiler cleanings, silt and dredgings, scrap metal, used filter materials, contaminated rubbish, used containers, effluent treatment sludge, tar pitch and bitumen, and treated timber.

Authorised Landfill near Whitestone 1 (W1)

1. Waste Management Licence number: 61569

Licence status: Expired (Company dissolved 06/06/2018)

Licence type: A04

Facility name: Ravenfield Park Tip

Site name: MR M WHITE

Site building name: A White Limited

Site street: Ravenfield Park Tip

Site area: Ravenfield

Site town: Rotherham
Site County: South Yorkshire
Site postcode: S65 4LJ
Licence type description: A04: Household, Commercial & Industrial Waste Landfill
NGR: SK4860095800 448600 395800
Date issued: 10 Nov 1977
EPR licence number: EA/EPR/DP3995ZJ

Please note: We deem those under the title 'historic landfill' because the site stopped operating prior to the Environment Agency coming into operation in 1995. All land that could be classed as contaminated land under section 2A of the Environmental Protection Act (EPA) 1990 are looked after by the Local authority. (Although it does not mean that the land is or is not contaminated). We do not hold any more information on these historic landfill sites.

Historic Landfill information is available on the Historic Landfill Site database, below is the link to the database.

<https://www.data.gov.uk/dataset/17edf94f-6de3-4034-b66b-004ebd0dd010/historic-landfill-sites>

From: [Squire, Sandra](#)
To: [Whitestone Solar](#)
Cc: [Brown, Dan](#)
Subject: Whitestone Solar Farm EIA Scoping Consultation - EN0110020
Date: 20 May 2025 11:37:52
Attachments: [image001.jpg](#)

You don't often get email from sandra.squire@forestrycommission.gov.uk. [Learn why this is important](#)

Thank you for consulting the Forestry Commission on this proposal.

As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.

The site is adjacent to several ancient woodlands, including both Burnt Wood and Spring Wood Ancient Semi Natural Woodlands. Burnt Wood would be enclosed by the project on three sides, with Spring Wood on two sides. The site also contains and is adjacent to some small fragmented areas of mixed deciduous woodland.

Ancient Woodland:

Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed.

Section 5.4.32 of EN-1 – The Overarching National Policy Statement for Energy states:

“Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both the construction and operational phases”

We would particularly refer you to further technical information set out in Natural England and Forestry Commission’s [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide](#) and [“Keepers of Time” – Ancient and Native Woodland and Trees Policy in England](#).

The Standing Advice states that proposals should have a buffer zone of **at least** 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you’re likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction.

For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be **at least** 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. This will create a minimum root protection area.

Where possible, buffer zones should contribute to wider ecological networks and be part of the green infrastructure of the area. They should consist of semi-natural habitats such as including woodland, scrub, heathland and wetland. There is a need to consider both the direct and indirect impacts resulting from construction.

Direct impacts can include, but are not limited to, damaging or compacting soil, damaging functional habitat connections and changing the woodland ecosystem

by removing the woodland edge or thinning trees. Indirect impacts can also include reducing the amount of semi-natural habitats next to ancient woodland, increasing the amount of dust, light, air or soil pollution, changing the landscape character of the area or increasing the risk of damage to property requiring tree management that could cause habitat degradation.

We would expect to see a detailed assessment of any impacts to the ancient woodlands, including details of measures to be taken to reduce and mitigate any effect.

It is essential that fuels, chemicals or water materials such as topsoil, minerals or hardcore are not stored on Ancient woodland soils or under the woodland canopy. Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage.

Mixed deciduous woodland – Priority Habitat:

Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Section 5.11.27 of EN-1 of the Overarching National Policy Statement for Energy states:

"Existing trees and woodlands should be retained wherever possible.....The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long term management and maintenance of newly planted trees should be secured"

Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through loss of connectivity, damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development. Loss of habitat connectivity is a particular concern where the woodland would become isolated in its landscape and surrounded by development on several sides or is completely surrounded by it.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy.

Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into

the root protection zone as well as dust prevention measures to reduce any potential impact of dust pollution.

Net Deforestation and Tree Planting:

It is expected that there will be thorough assessment of all trees within the project boundary to identify any ancient or veteran trees in line with good arboricultural practice (BS 5837), also to assess any net loss of trees and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.

Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development.

Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between existing woodland blocks, to link them and ensure maximum gains to increase habitat connectivity, making woodlands more resilient and to benefit biodiversity across the whole site, not solely in specific isolated areas to be used as screening. Ideally we would like to see woodland creation to be carried out in 5ha blocks or that connecting planting with existing woodlands, should create blocks of at least 5ha.

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050, The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes:

The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases.

Plans should also be in place to ensure the long term management and maintenance of new and existing woodland, perhaps by creation of a UK Forestry Standard compliant management plan, with access also needing to be considered for future management.

Large scale project fencing could also potentially change how deer move throughout the landscape, this may increase the numbers of deer crossing local roads which may increase the number of deer collisions. Herbivore browsing will affect newly planted woodland and if fenced out of a large area, will increase impacts in surrounding woodlands and the wider landscape where hedgerows and stewardship schemes may be affected. It is recommended that an assessment is undertaken of the risk to deer populations with an increase in culls prior to project commencement if the site is to be fenced affecting the normal range of the deer in the landscape.

We hope these comments have been useful to you. If you require any further information, or would like to discuss woodland creation or management, please don't hesitate to contact me.

Best wishes

Sandra

Sandra Squire

Local Partnership Advisor

East & East Midlands

Tel: [REDACTED]
[REDACTED]

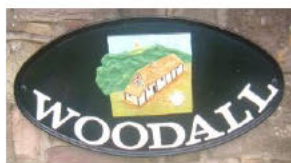


[Subscribe](#) to our newsletter to be the first to hear about the latest information, advice, and news from the Forestry Commission

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorised to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware.



Harthill with Woodall Parish Council



Village Hall
Winney Hill
Harthill
Sheffield
S26 7YL

20th May 2025

For The Attention of Ms Emily Park
Environmental Advisor on behalf of the Secretary of State
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol,
BS1 6PN

Dear Ms Park,

Planning Inspectorate Reference - EN0110020

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Whitestone Net Zero Ltd (the applicant) for an Order granting Development Consent for the Whitestone Solar Farm (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Harthill with Woodall Parish Council reviewed the information relating to the above application and scoping consultation and would like to make the following comments.

Request for reduction in the size of the application

Role of Parish Council's as a consultee

NSIPs are large-scale developments that are considered nationally important. Despite their scale, they directly impact local communities, often in rural or semi-rural areas where parish councils operate.

- Parish councils provide valuable local detail that might otherwise be overlooked in national-level decision-making.
- Their local knowledge can highlight issues that might not be evident to planning officials or developers.
- Their input helps ensure that localised environmental, social, and economic impacts are considered within a strategic national framework.
- Their unique strength lies in deep local knowledge—from flood risks and wildlife habitats to transport issues and cultural heritage. They represent the democratic voice of small communities, making them vital to well informed planning decisions.

Volume of Parishes in one application

Harthill with Woodall Parish Council is concerned about the scale of Whitestone Solar Farm Development.

Parish councils offer a critical grassroots perspective in planning, helping to protect local identity, environment, and community well-being. In the NSIPPS framework, their input is formally included but Council is concerned that the sheer volume of this project will diminish local input and the numerous parishes that this will impact will not have their individual knowledge heard.

Harthill with Woodall Parish Council would like to understand how it might seek the equivalent of rule 6 status in relation to any hearing.

Difficulties if navigating the NSIPPS Framework due to the size of Whitestone

Small parish councils operate with limited funds, part time clerks and volunteer councillors. In contrast, developers like Whitestone have a large legal and consultancy team preparing technical documentation. We are only at the start of the process and the documents that we were asked to review and comment on total over 450 pages, making it difficult for small councils to respond effectively.

Cost rather than community driven

The proposed development is too large in scale for this area, and its different parts are spread across several boroughs that have little or no geographical or community connection. These locations do not form a coherent or natural site and combining them into a single project seems more about convenience than reflecting the reality on the ground. Each area has its own distinct character, priorities, and local concerns, which risk being overlooked when treated as one large scheme. A development of this size and spread should be properly assessed in terms of its individual and cumulative impacts on the specific communities it affects.

Resources and Engagement

We are concerned that Rotherham Metropolitan Borough Council may not have the capacity and resources necessary to effectively deal with a project of this size alongside daily workload.

We would also like to see a clear commitment from the scheme promoter – Whitestone Net Zero Limited – to work closely with all consultees, statutory bodies, and directly affected communities

ahead of the statutory consultation. Recent communication about the application amendments was shared in an online session with two fixed dates. An appeal for additional sessions was refused.

Conclusion

Harthill with Woodall Parish Council would respectfully ask the Planning Inspectorate to consider splitting this application into three separate applications, based on geography and local relevance. The current proposal spans a wide area and crosses multiple boroughs and parishes, each with its own local character, priorities, and planning context. Treating it as one large application makes it difficult for Parish Councils to fully understand and engage with the specific impacts relevant to their communities. Dividing the project into more manageable, clearly defined sections would allow for more meaningful consultation, better local scrutiny, and a fairer planning process for those most affected.

Council do not believe the areas are Geographically contiguous or logically connected, nor are they functionally interdependent, other than the fact that they feed into Brinsworth, they do not appear to rely on each other to operate. Council recently drove to meet Councillors from Conisbrough Park Parish Council and also met with representatives from the Save our Greenbelt Group. This was a 30-minute drive from Harthill. This hi-lights that parts of the proposed NSIP are located a considerable distance apart and adds to concerns about the lack of geographic cohesion in the application. From a local perspective, it feels less like a single, unified infrastructure project and more like a collection of separate developments being grouped under one umbrella. It is clear that our concerns about not being heard on such a vast development are shared by other Parishes, parishioners and community groups.

Scoping Document

Tourism

The scoping document appears to under-recognise the scale, nature, and economic value of tourism within the local and surrounding rural community. While tourism may not be characterised by large-scale attractions, it plays a vital and often dispersed role in sustaining local businesses, employment, and rural services. Visitors are drawn to the area for its landscape, tranquillity, heritage, and recreational opportunities—factors that are particularly sensitive to the type and scale of development proposed.

The document fails to account for rural and community-based tourism, including day visitors, walkers, cyclists, wildlife enthusiasts, and those seeking heritage or cultural experiences. These forms of tourism are often informal and dispersed, yet collectively they contribute significantly to the local economy and quality of life.

Harthill and Woodall have the benefit of beautiful ponds open to fishing, outdoor swimming and sailing amongst other water activities. Our walks are published on 6 maps and our play area and picnic benches are visited by families from surrounding areas. Harthill has its own bowling green and Leisure Centre, a wonderful Church and an active Village Hall. It is unusual for Parishes as small as Harthill with Woodall to be able to sustain a cluster of shops and two public houses. Tourism is part of the reason that this is possible.

The Environmental Impact Assessment should include a fuller and more accurate consideration of local tourism, reflecting how visitors use and value the rural landscape. Changes to character, access, or tranquillity can have a real impact on the area's appeal to tourists and, in turn, on the local economy.

Council would also suggest that any assessment should look at tourism in the broader context of Wales Ward when considering the proposed solar project. Our area boasts fantastic attractions such as Gulliver's Theme Park, Rother Valley Country Park, various cyclist groups, and the Waleswood Camping Site. Additionally, our rich Domesday history continues to draw visitors from across the country.

It's also important to note that Harthill with Woodall Parish Council and Wales Parish Council are both based within Wales Ward, further emphasizing the community's local governance and interest in preserving our area's character and appeal.

These elements are integral to the larger Rother Valley initiative within RMBC, which aims to promote tourism and celebrate our stunning rural landscape. RMBC has invested heavily in this initiative, recognizing its importance to the local economy and community.

However, there is concern that the scale of the proposed solar project could potentially undermine these efforts and impact the future of our area's tourism appeal.

Viewpoint

We note that the viewpoint map included in the scoping document appears to have been produced without a thorough understanding of the local landscape. It gives the impression of being desk-based, rather than informed by direct experience of the site and its surroundings. Given the rural nature of this area and the importance of visual impact in the assessment of this scheme, we would strongly encourage the developer to undertake more extensive on-site visits and field assessments. This would ensure that key viewpoints are properly identified, including those valued by the local community but not necessarily captured through desk-based mapping. A more comprehensive understanding of the site's topography, sightlines, and public vantage points is essential to produce a meaningful Landscape and Visual Impact Assessment (LVIA).

Canal

Harthill and Woodall play a vital supporting role in the functioning of the Chesterfield Canal through Harthill Reservoir, which was constructed in the 1770s specifically to supply water to the canal. The reservoir collects and stores rainwater from the surrounding catchment area and releases it into the canal system as needed to maintain water levels, particularly during dry periods when navigation and ecological balance would otherwise be disrupted.

This historic linkage highlights the integrated relationship between Harthill's rural environment and wider regional infrastructure. The reservoir remains an operational and essential part of the canal's water management system today, making Harthill and Woodall important, if often overlooked, contributors to the ongoing viability of this heritage waterway.

With the potential run off of water from Solar Panels and associated infrastructure, Council would ask that the Canal & River Trust are added as a statutory consultee to Whitestone 3 if they have not been added already.

Safety

Council wishes to highlight the importance of ensuring that the scoping report thoroughly addresses the potential environmental impacts of fires associated with battery energy storage systems (BESS). In light of the growing number of fire incidents at similar facilities in recent months, it is vital that the report includes a detailed assessment of fire risks and their potential consequences for air quality, local ecosystems, and public health. In view of the increase in occurrence, this should include a review of current safety standards and a consideration of whether more rigorous safety testing and certification processes are warranted. The Environmental Impact Assessment should also address fire prevention strategies, containment systems, and emergency response measures to ensure that risks are minimised and appropriately managed.

Lack of information

At this stage, we note that the precise location of key elements of the proposed infrastructure—such as the battery storage facility—has not yet been confirmed. Without this critical locational information, it is difficult to provide fully informed comments on the proposed scoping document. The absence of defined infrastructure locations limits our ability to assess potential environmental impacts, and the relevance or adequacy of the topics proposed for assessment.

Cumulative Disruption

The Parish has experienced significant cumulative disruption in recent years due to a number of major infrastructure and development projects, including the windfarm, NPG power cable installations, fracking proposals, Canal & River Trust spillway construction, water pipe replacement works, and ongoing new housing developments. Given this context, we are particularly concerned about the potential for further impacts on our community, and we would expect these cumulative effects to be recognised and addressed in the environmental assessment.

Cumulative impact of other local developments

Harthill with Woodall Parish Council is also concerned about the cumulative impact that the Whitestone Solar Farm, together with a number of other nearby developments, may have on our local area and Rotherham as a whole.

While each project on its own may seem manageable when assessed, we are now seeing a growing number of solar farms, battery storage facilities, and related infrastructure being proposed or approved in the area — all of which could have a much greater combined effect on our landscape, local environment, and communities than is currently being acknowledged.

We strongly believe that the Environmental Statement for this application must take full account of these other schemes, even if they are smaller or not considered nationally significant. Many of them are very close to Whitestone and affect the same roads, fields, views, wildlife habitats, and people.

We would like to see a proper cumulative assessment that includes:

- A full list of all other similar developments in the area, including those that are already built, approved, or in the planning system;
- A careful look at how these projects together could change the rural character of our landscape;
- Consideration of the combined impacts on local wildlife, especially where multiple sites might affect the same species or habitats;
- Attention to construction disruption, especially if several schemes go ahead around the same time and bring increased traffic, noise, or disturbance to nearby villages;
- Any potential pressure on local roads, rights of way, or community infrastructure from multiple developments happening close together.

We feel it is essential that these smaller projects are not overlooked simply because they are not classed as NSIPs. Our community experiences the effects of all of them, and the cumulative burden needs to be properly understood and addressed.

Mental Health

Harthill with Woodall Parish Council also wishes to raise the issue of potential impacts on mental health and wellbeing arising from changes to the visual environment. While the areas affected may not constitute formally accessible green space, the open rural landscape and natural views contribute significantly to the sense of place and quality of life for local residents. The introduction of large-scale infrastructure—such as solar panels, battery storage units and associated developments—could lead to a substantial change in the character of the landscape. This visual intrusion may have a detrimental effect on mental wellbeing, particularly for those who value the current rural outlook as part of their daily living environment. Public Health England's 2020 review, *Improving Access to Greenspace*, highlights that greener environments are associated with better mental health outcomes, including reduced levels of depression, anxiety, and fatigue, and enhanced quality of life for both children and adults. We believe this aspect warrants fuller consideration within the Environmental Impact Assessment.

Timescales

Looking ahead to the forthcoming stages of the process, we respectfully ask that consideration is given to the timeframes provided for Parish Councils to review and comment on future documentation. Unlike principal authorities, Parish Councils do not receive funding or technical support from the developer and we would hope to be given access to the reports instructed by RMBC when they become available. To ensure that local knowledge and community perspectives are properly reflected, we would welcome sufficient time being built into future consultation periods to allow Parish Councils to access, understand, and respond to the documents. The sheer size of the area that these reports will cover could result in vital local information being omitted.

Summary

Overall, based on information provided to date, Harthill with Woodall Parish Council is concerned that this development will destroy the character of our small parish and remove valued areas of greenbelt land. Council therefore wants to be able to fully engage in the consideration of this application.

In conclusion, Harthill with Woodall Parish Council respectfully asks that the Planning Inspectorate to give full and proper consideration to the points raised in this letter. While we understand the national importance of infrastructure projects of this scale, the current approach of combining multiple geographically dispersed sites into a single application risks overlooking localised impacts, community identities, and specific planning contexts. It also compounds the resource issues that Parish Council's face when reviewing relevant documents. We therefore strongly urge that this project be broken down into three separate applications to ensure more effective consultation, clearer scrutiny, and a fairer planning process for each affected community.

Council believes that this approach would align more closely with the principles set out in the National Planning Policy Framework (NPPF), particularly around early and meaningful engagement, recognising distinct local character, addressing cumulative impacts, and promoting health and wellbeing. We believe a more locally responsive, transparent, and phased process is essential to ensure that small communities like ours are fully heard and represented in decisions that will affect our environment and way of life for many years to come.

Yours Sincerely,



Caroline Havenhand
Clerk – Harthill with Woodall Parish Council



Emily Park
The Planning Inspectorate
<<by email>>

Direct Dial: 01904 601866

Our ref: PL00797498

22 May 2025

Dear Ms Park

**REQUEST FOR ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING
OPINION FOR WHITESTONE SOLAR FARM**

Application No. EN0110020

Thank you for your letter of 1 February 2023 consulting us about the above EIA Scoping Report.

This development could, potentially, have an impact upon a number of designated heritage assets¹ and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement (ES) to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

Given the extent of the proposed solar array and the topography of the application site, this development is likely to be visible across a very large area. As a result, it could affect the significance of heritage assets at some distance from the site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

Our initial assessment shows that there are numerous designated heritage assets within 5km of the proposed development. We would draw your attention, in particular, to the following:

- Conisbrough Castle (Scheduled; NHLE 1010828; Grade I listed building; NHLE 1192747),

¹ A Designated Heritage Asset is defined in the National Planning Policy Framework as 'A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation'.



37 TANNER ROW YORK YO1 6WP

Telephone 01904 601948
HistoricEngland.org.uk



- Barn fronting onto bridle path on east side of Firsby Hall (Grade II; NHLE 1192930),
- Garden wall with pedestrian entrance archway fronting onto bridle path on east side of Firsby Hall (Grade II; NHLE 1151535),
- Ravenfield Conservation Area, and
- Clifton Conservation Area.

This is not an exhaustive or definitive list and we expect the ES to present a reasoned and appropriately detailed assessment of impact on designated and non-designated heritage assets.

As a general approach we would recommend the involvement of the Conservation Officer and archaeological staff of the Local Planning Authority in the development of this assessment. They are best placed to advise on:

- local historic environment issues and priorities;
- how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment;
- the nature and design of any required mitigation measures; and,
- opportunities for securing wider benefits for the future conservation and management of heritage assets.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this and should include both fixed and dynamic/kinetic viewpoints.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns. This might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits and can also lead to subsidence of buildings and monuments.

We have the following specific comments to make regarding the content of the final ES document:

- Conisbrough Castle occupies a strategic hilltop location at the northeast end of Conisbrough, a town itself situated on a prominent ridge. The outer bailey of the castle is roughly defined by Castle Hill to the west and extant earthworks to the north, east, and south. The site is a significant example of medieval military architecture used as a statement of power in South Yorkshire, with its well-preserved keep being one of the finest examples of a late 12th-century great tower. As such, we would expect that the ES will include a full assessment looking at the contribution made to the significance of Conisbrough Castle by its



37 TANNER ROW YORK YO1 6WP

Telephone 01904 601948
HistoricEngland.org.uk



setting, in line with Historic England: *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets*.

- The area has a dynamic later Pleistocene and early Holocene geomorphological history (Glacial Lake Humber, etc.) and may include areas of deep alluvium that can seal prehistoric land surfaces and human activity.
- Careful consideration should be given at this point, therefore, to the staged approach for archaeological survey and evaluation. The starting point should be a desk-based geoarchaeological study to consider the geomorphological history of the area.
- Magnetometry may not be the most appropriate geophysical survey technique for the development area as it is more suited to detecting near surface anomalies.
- In specific circumstances, techniques such as earth resistance tomography may be better suited.
- A desk-based geomorphological study would also be invaluable when planning any necessary geoarchaeological and palaeoenvironmental work (boreholes, deposit modelling, etc.).
- It may also demonstrate that long, linear and shallow trial excavation trenches may not be appropriate in all circumstances; deep and stepped down trenches may be required to evaluate deeply buried prehistoric archaeology.
- Reference should be made to Historic England 2021: *Commercial renewable energy development and the historic environment Historic England Advice Note 15*. Swindon, in Section 6.2 to inform and guide the assessment works.
- The final ES document should include Heritage Assessments for both designated and non-designated Archaeology and Built Heritage assets. The scope and methodology for these assessments will need to be defined and agreed at an early stage and clearly presented in the final ES document.
- Cumulative effects on the significance of designated and non-designated heritage assets and the landscape character should be thoroughly analysed and presented in the ES. Cumulative effects of the development alongside those of other proposed developments in a defined geographic proximity to the project; and, cumulative effects for a single receptor where multiple impacts are predicted to arise from the scheme, should be considered.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely

Suzanne Lilley

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



37 TANNER ROW YORK YO1 6WP

Telephone 01904 601948
HistoricEngland.org.uk



CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

Email - WhitestoneSolarfarm@planninginspectorate.gov.uk

Dear Ms Emily Park

Date: 14 May 2025

**PROPOSED WHITESTONE SOLAR FARM (the project)
PROPOSAL BY WHITESTONE NET ZERO LTD (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of 24 April 2025 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Hazardous Substance Consent

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed Whitestone Solar Farm project components as specified in the *Volume 2: EIA Scoping Report, Appendix A1: Figures* dated April 2025, *Figure 1.1, Rev A01*, drawing title '*Site Location*', do appear to cross the Consultation Zones of several Major Accident Hazard (MAH) sites and MAH pipelines. Please see the list attached in Appendix 1 a (MAH sites) & b (MAH pipelines).

The Applicant should make contact with the operators of MAH sites (see Appendix 1a), to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.

The Applicant should also make the necessary approaches to the relevant MAH pipeline operators (see Appendix 1 b). There are three particular reasons for this:

- i) the pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
- ii) the standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation if the development proceeds.
- iii) to establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice would be dependent on the location of areas where people may be present. When we are consulted by the Applicant with further information under Section 42 of the Planning Act 2008, we can provide full advice.

Would Hazardous Substances Consent be needed?

It is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. Hazard classification is relevant to the potential for accidents. For example, hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an addition rule in the Schedule for below-threshold substances.

If hazardous substances planning consent is required, please consult HSE on the application.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - [Annex G – The Health and Safety Executive](#). This document includes consideration of risk assessments on page 3.

Appendix 1

a. Major Accident Hazard sites:

	HSE Reference	MAH site Operator	MAH site Address
1	H0431	Ibstock Building Products Ltd	Warwick Road, Maltby, Rotherham S66 8EW
2	H4124	Great Bear Distribution Ltd	Hellaby Lane, Hellaby, Rotherham S66 8HN

b. Major Accident Hazard pipelines:

	HSE Reference	Transco Reference	Pipeline Operator	Pipeline
1	7055	1326	Cadent Gas Ltd	Butterwick West / Hellaby Lane
2	7056	1327	Cadent Gas Ltd	Hellaby Lane / Hooton Roberts
3	7057	1328	Cadent Gas Ltd	Warning Tongue Lane/Hellaby Lane
4	7058	1329	Cadent Gas Ltd	Hellaby Lane / Totley (ex Supergrid)
5	7059	1330	Cadent Gas Ltd	Hellaby Lane / Totley

Explosives sites

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk . We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

Pp Shirley Rance

Cathy Williams
CEMHD4 NSIP Consultation Team

From: [JohnP Holmes](#)
To: [Whitestone Solar](#)
Subject: FW: EN0110020 - Whitestone Solar Farm - EIA Scoping and Consultation and Regulation 11 Notification
Date: 06 May 2025 16:15:05
Attachments: [image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)

You don't often get email from johnp.holmes@kirklees.gov.uk. [Learn why this is important](#)

Dear Emily Park

I write in reply to your letter dated 24th April 2025 (your ref: EN0110020).

I write to confirm that Kirklees Council has no comments to make.

Regards

John Holmes
Deputy Team Leader (West) – Development Management
Planning and Development Service
Growth & Regeneration
PO Box 1720, Huddersfield, HD1 9EL
Tel: [REDACTED]
Website: www.kirklees.gov.uk
Email: [REDACTED]



Laughton-en-le-Morthen Parish Council

Incorporating Brookhouse, Carr, Slade Hooton and Newhall Hamlet

The Village Hall
Firbeck Avenue
Laughton-en-le-Morthen
SHEFFIELD
S25 1YD

Telephone – 01709 528823

Email: clerk@laughtonparishcouncil.gov.uk

Date: 22nd May 2025

For The Attention of Ms. Emily Park
Environmental Advisor on behalf of the Secretary of State
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol,
BS1 6PN

Dear Ms Park,

Planning Inspectorate Reference - EN0110020

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11
Application by Whitestone Net Zero Ltd (the applicant) for an Order granting Development Consent for the Whitestone Solar Farm (the proposed development)
Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Laughton en le Morthen Parish Council reviewed the information relating to the above application and scoping consultation. As the proposed development does not fall within our parish boundaries, the Parish Council does not wish to comment at this time on the scoping document. We believe that

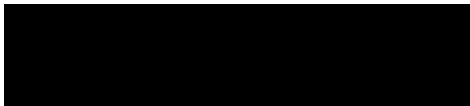
neighbouring parishes, within whose boundaries the development lies, are better placed to assess and respond to the relevant local considerations and potential impacts.

Council does however wish to express serious concerns about the scale of the scheme and its wider impact on our community.

Many of our residents regularly travel through the affected areas for work, education, and essential services, and we are concerned that the cumulative impact on roads, landscape character, and the rural environment will be significant. We wish to emphasise that the effects of large-scale infrastructure such as this extend beyond parish boundaries and affect neighbouring communities.

We are therefore concerned that the size and complexity of the proposed scheme may limit the ability of smaller parish councils—with limited time and resources—to engage meaningfully with the consultation process. To support better local engagement and scrutiny, we would strongly support the project being submitted as three separate, smaller applications. We believe this would make the process more accessible and manageable for local councils and residents alike.

Yours Sincerely

A solid black rectangular box used to redact the signature of the Clerk.

C Havenhand (Clerk to Laughton en le Morthen Parish Council).

From: [Rebecca Garrett](#)
To: [Whitestone Solar](#)
Cc: [Whitestone Solar Farm](#); [transportplanning](#); [Spatial Planning](#)
Subject: EN0110020 Whitestone Solar Farm National Highways response to the ES Scoping
Date: 20 May 2025 18:07:13

You don't often get email from rebecca.garrett@nationalhighways.co.uk. [Learn why this is important](#)

Dear Emily Park

Thankyou for consulting with National Highways [NH] for our written opinion, and level of detail for the information to be provided in the Environmental Statement (ES) and the scoping process, relating to the Proposed Development of the **Whitestone Solar Farm**.

The development proposals across the site are adjacent to, and bisected by, the M1 and M18, both forming part of the SRN, hence the need for this review to ensure that the development proposals do not materially impact upon the capacity, operation and safety of the SRN.

National Highways will need to understand the likely traffic impact of the proposals upon the SRN, namely the M1 and M18 and also the impacts on the cable crossings of the SRN.

Site egress and access arrangements for each land parcel is not yet identified within the EIA Scoping Report. NH expect the applicant to outline site access arrangements within a subsequent Transport Assessment [TA] and Construction Traffic Management Plan [CTMP]. Any internal access roads to be constructed as part of the development, in order to accommodate site traffic, should also be outlined within the TA and CTMP.

National Highways will require any planning assessment to engage and adhere to guidance contained within DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development [the Circular].

Cabling Corridor Options

Any works carried out in, on, over, or under National Highways' land will need to be agreed in writing between the undertaker and National Highways to ensure that National Highways can exercise all the statutory functions.

Any form of Horizontal Directional Drilling [HDD] cable route under the SRN, would require a condition survey and regime of monitoring of any National Highways assets or structures that National Highways considers will be affected by the specified works, and will need to be reviewed and agreed in writing by National Highways, and a form of security put in place through the DCO to protect National Highways against any financial loss.

Trenchless crossings under National Highways' network is to be in accordance with CD622 Managing Geotechnical risk
<https://www.standardsforhighways.co.uk/dmrb/search/ff5ed991-71ed-4ff2-9800-094e18cd1c4c>

For any proposed works to the SRN, all drawings, specifications, and calculations would be required for review by National Highways and must meet current standards with the correct certification. The undertaker must comply with National Highways' road space booking procedures prior to and during the carrying out of the specified works.

NH would note that the routing of power cables through or attached to existing overbridges or culverts is not likely to be acceptable to National Highways. The required submissions of information relating to any such routing requests should be confirmed by National Highways.

National Highways for the purpose of maintaining its statutory undertaking would not permit the undertaker within the DCO to:
acquire or use land forming part of; acquire new or existing rights over; or seek to impose or extinguish any restrictive covenants over; any of the strategic road network, or extinguish any existing rights of National Highways in respect of any third-party property, except with the consent of National Highways by written request to legalserviceteam@nationalhighways.co.uk.

Boundary Treatment

Further information is required with regards to the specifics of the physical site boundaries at and how these will be implemented in relation to the existing land under National Highways ownership. Further information is also required in relation to how access to this boundary will be obtained throughout development construction and maintenance, whilst noting that highway land cannot be used for these purposes. Moreover, confirmation should be provided as to the extent of the land under the ownership of the applicant up to the point where this land meets the National Highways boundary.

Drainage

National Highways require confirmation from the applicant that the development drainage will have no relationship with the SRN drainage system associated with the M18 or M1 motorways.

Energy Storage Units

The relative location and proximity of any energy storage units located within the site, to the SRN, should be clearly identified within any forthcoming statutory consultation submissions.

Embankments

National Highways will require confirmation from the applicant that any existing embankments to the boundaries of the site, adjacent to the SRN, can safely accommodate the development proposals. In addition, it is noted that there is potential for cables to be routed under the M1 and/or M18, and information needs

to be provided by the applicant on this matter.

Construction Safeguarding

Further information is required with regards to the specific construction safeguards that will be implemented by the applicant to ensure that the construction of the development at the site's boundaries does not impact the SRN in any way.

Site Access

Further details are required in consideration of the proposed site access strategies during all phases of the development lifecycle. National Highways will consider the appropriateness of the site access proposals following the publication of the ES.

Abnormal Loads

It should be noted that any abnormal loads would need to be approved via Electronic Service Delivery for Abnormal Loads (EDSAL) - <https://nationalhighways.co.uk/road-safety/abnormal-loads-and-the-esdal-system>. Further consideration of abnormal loads is provided in the subsequent sections of this TM, in relation to the CTMP requirements.

Glint and Glare

National Highways consider that a Glint and Glare Assessment should be produced as part of the application. When considering glint and glare, the following information should be provided within each application:

- Outline of the site context, including location, proximity to the SRN and topography, and
- Outline of proposal details, including scale, site boundary, site map, mounting arrangements and orientation.

The following information should be provided where it is considered that glint and glare have the potential to impact upon motorists:

- Overview of sun movements, including time, date, latitude and longitude, as well as the relative reflections;
- Identification of potential receptors of concern. For National Highways the primary concern will be the reflection of the sun from the solar panels towards surrounding road users;
- Identification of representative locations approximately every 100m along the surrounding road network where the solar development may be visible, if only marginally;
- Undertake geometric calculations to determine whether a solar reflection may occur for each of the identified road-based receptors from the proposed development. A height of between 1.05m and 2.00m should be added to the overall ground height at a particular location to reflect the estimated eye level of a road user, in line with the visibility envelopes in the Design Manual for Roads and Bridges CD 109;
- Height differences between the solar panels and the SRN in question, need to be considered. If the road-based receptors are below the envisaged

reflection, then there is no need for a Visual Impact Assessment;

- Where it has been calculated that a reflection may occur for road receptors, consideration should be made of the location of the solar reflection with respect to the location of the sun in the sky, its angle above the horizontal and the time of day at which a reflection could occur;
- Provide a breakdown of the significance of the impacts and determine whether the solar reflection is likely to be a significant nuisance or a hazard to safety;
- Consider the influence of appropriate measures such as screening, revised use of materials and orientation to mitigate the potential impact on road users; and
- Consider the impact on signage and gantries at the SRN which may impair driver decision-making.
- Additionally, there are a number of further considerations which the applicant should consider:
 - Does the panel elevation angle represent the elevation angle for all of the panels within the development?;
 - Does the assessment consider not only the reflection from panel faces, but also from the frame or reverse of the panel, as these can often be comprised of materials with reflective capability? And;
 - Does the assessment consider an appropriate number of receptors, rather than a singular location?

Transport Assessment

National Highways considers the TA should be prepared in support of the development proposals and that the TA should be based on a 'first principles' approach for the construction, operation and decommissioning phases evidenced using the applicant's / operator's experience on similar schemes to inform the TA. This is considered by NH to be the most accurate methodology to enable to understand and assess any peak hours impacts at the SRN.

The TA accompanying the planning submission is expected to follow relevant guidance, notably the Department for Transport Circular 01/2022 to enable the impact of the assessment of the development proposals at the SRN to be assessed.

Traffic Generation and Distribution:

- Trip Generation and Distribution for all phases of site development, including construction, operation and decommissioning;
- Number of AIL movements;
- Number of HGV movements;
- Distribution of construction vehicles and staff / operational movements; and
- Timings of vehicle movements including any movements between site parcels.

Geometric and operational constraints on proposed routes:

- Geometry and visibility at access point(s) to / from the SRN; and
- Collision record at access point(s) to / from the SRN.

Construction Traffic Management Plan

National Highways consider that a CTMP should inform the development proposals and should be aligned to the TA to ensure there is crossover and compliance between the two documents.

The CTMP should demonstrate the likely impacts of the development on the SRN as well as on existing road users. The CTMP should identify the measures that can be put in place to minimise traffic and associated environmental impacts on the SRN and its adjacent receptors.

The purpose of the CTMP is to ensure the safety of the public and the workforce. The CTMP should include the following:

- Identification of the approved haul routes to site (including AIL routes) and identification of measures to prevent the use of any unauthorised routes;
- Identification of the site access strategy;
- Details of the expected traffic generation associated with the construction, operation and decommissioning periods including maximum daily HGV trips;
- Identification of the proposed works programme by construction task;
- Identification of workforce numbers for the site and details of workforce travel arrangements;
- Details of site working hours and details of any exceptions;
- Measures to minimise, wherever possible, the use of public roads during morning and evening peak hours;
- Details of measures to reduce the number of delivery trips to site such as a combination of consolidated ordering, rationalising suppliers and consolidated deliveries;
- Details of measures to reduce on-site waste such as recycling and re-use of materials to minimise the number of collections from site;
- Provision of wheel washing facilities (or mechanical rumble devices where mains water is not available) on all site exits;
- Vehicles carrying soil and other dusty materials to be fully sheeted when travelling to or leaving site;
- Use of an approved mechanical road sweeper to clean the surrounding road network of any mud or debris deposited by site vehicles. The road sweeper should be available whenever needed;
- Details for the use of any traffic lights on public roads for safety. If used, traffic queues will require monitoring and sequences to reduce potential congestion;
- Details for any temporary traffic management and warning signs;
- Details for publicising the movement of AILs;
- Details of a site liaison officer who will act as point of contact for the CTMP; and
- Details regarding how the CTMP will be monitored.

Operation

NH consider it very important for the applicant that the design of the development is undertaken in a way in which the adjacency of the development does not directly interfere with the operation of the SRN.

The applicant should also state how vehicle access arrangements would be co-ordinated with existing site operations, notably surrounding substations and the Penny Hill Wind Farm.

Notwithstanding the above, it is noted that the EIA Scoping Report states that the effect of operational traffic is expected to be negligible and so is proposed to be scoped out of the traffic and transport ES chapter. Whilst the principal of scoping out the impact of the operational phase traffic is generally considered acceptable, National Highways will require confirmation of typical daily and peak period movements associated with this phase of the development, before the assessment of the operational impacts can be discounted.

Decommissioning

It is stated that a legal requirement of the DCO process would be the completion of the decommissioning phase 60 years from the start of construction. Decommissioning will involve the removal of solar arrays and ancillary infrastructure. The site would then revert back to its prior usage, such as for agricultural purposes. NH has already made reference to the fact that the decommissioning phase should be referenced within the TA, although it is considered that a Decommissioning Traffic Management Plan can also be secured via a suitably worded planning requirement, should planning permission for the development proposals be granted.

Many thanks

Becky

Becky Garrett, Planning & Development
National Highways | 2 City Walk | Leeds | LS11 9AR
Mob: [REDACTED]
Web: www.nationalhighways.co.uk

Please note I work Monday to Thursday

Notice of absence: I will be on leave from the 26th to the 30th May returning on the 2nd June

This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | info@nationalhighways.co.uk

*Registered in England and Wales no 9346363 | Registered Office: Bridge House,
1 Walnut Tree Close, Guildford, Surrey GU1 4LZ*

Consider the environment. Please don't print this e-mail unless you really need to.

From: [NATS Safeguarding](#)
To: [Whitestone Solar](#)
Subject: RE: EN0110020 - Whitestone Solar Farm - EIA Scoping and Consultation and Regulation 11 Notification [SG38471]
Date: 28 April 2025 13:59:32
Attachments: [~WRD0002.jpg](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)

You don't often get email from natssafeguarding@nats.co.uk. [Learn why this is important](#)

Our Ref: SG38471

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully



NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Internal

Date: 22 May 2025
Our ref: 511217
Your ref: EN0110020



Environmental Services,
Operations Group 3,
Temple Quay House,
2 The Square Bristol,
BS1 6PN

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

WhitestoneSolarfarm@planninginspectorate.gov.uk

T 0300 060 900

BY EMAIL ONLY

Dear Inspector

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: EN0110020 - EIA Scoping- Whitestone Solar Farm

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 24 April 2025, received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Detailed advice on scoping the Environmental Statement is available in the attached Annex.

For any further advice on this consultation please contact the case officer claudia.cox@naturalengland.org.uk and copy to consultations@naturalengland.org.uk.

Yours sincerely

Claudia Cox
Yorkshire and Northern Lincolnshire Area Team

Annex A – Natural England’s Advice on EIA Scoping

General principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an ES to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided¹.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

Please consider the following and whether we are aware of other projects we think do need to be considered.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects
- b. approved but uncompleted projects
- c. ongoing activities

¹ National Infrastructure Planning [Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements](#) (see Insert 2 – information to be provided with a scoping request)

- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

Biodiversity and geodiversity

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) and an [EclA checklist](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Many public authorities e.g. National Highways and National Grid have biodiversity duties including taking opportunities for habitat restoration or enhancement. They might have Key Performance Indicators (KPIs) to adhere to via Government policy, or have agreed approaches to BNG. Further information around general duties is available [here](#).

Remember to refer to the relevant sector specific information within National Policy Statements [here](#) and our own sector specific guidance on the SD Toolkit.

Designated nature conservation sites

Nationally designated sites

Sites of Special Scientific Interest

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

The development site is within or may impact on the following **Site of Special Scientific Interest**:

- Crabtree Wood SSSI
- Lindrick Golf Course SSSI
- Anston Stones Wood SSSI
- Sprotbrough Gorge SSSI

The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within each SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

Table 1: Potential risks to nationally designated sites: the development is within or may impact on the following sites	
Site name with link to citation	Potential impact pathways where further information/assessment is required
Crabtree Wood SSSI	Where construction traffic is proposed within 200m of a designated site, air quality assessment of the impacts will need to be undertaken. Please see our further advice on this in air quality below.
Lindrick Golf Course SSSI	Where construction traffic is proposed within 200m of a designated site, air quality assessment of the impacts will need to be undertaken. Please see our further advice on this in air quality below. We advice that the site is hydrologically connected to the proposed boundary of the development. During construction the potential pollution which may be produced should be considered and mitigation proposed if required i.e. through a CEMP. During operation the water pollution effects from panel washing and chemical pollution e.g. due to fire suppression equipment, should also be considered and mitigation proposed if required.
Anston Stones Wood SSSI	Where construction traffic is proposed within 200m of a designated site, air quality assessment of the impacts will need to be undertaken. Please see our further advice on this in air quality below. We advice that the site is hydrologically connected to the proposed boundary of the development. During construction the potential pollution which may be produced should be considered and mitigation proposed if required i.e. through a CEMP. During operation the water pollution effects from panel washing and chemical pollution e.g. due to fire suppression equipment, should also be considered and mitigation proposed if required.
Sprotbrough Gorse SSSI	Where construction traffic is proposed within 200m of a designated site, air quality assessment of the impacts will need to be undertaken. Please see our further advice on this in air quality below. We advice that the site is hydrologically connected to the proposed boundary of the development. During construction the potential pollution

Table 1: Potential risks to nationally designated sites: the development is within or may impact on the following sites	
Site name with link to citation	Potential impact pathways where further information/assessment is required
	which may be produced should be considered and mitigation proposed if required i.e. through a CEMP. During operation the water pollution effects from panel washing and chemical pollution e.g. due to fire suppression equipment, should also be considered and mitigation proposed if required.

Regionally and Locally Important Sites

The applicant should be minded towards the development of the [South Yorkshire Local Nature Recovery Strategy \(LNRS\)](#) when designing enhancement proposals.

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local sites are identified by the local Wildlife Trust, geoconservation group or other local group. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.

Protected species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).

Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing [Natural England wildlife licences](#). Applicants can also make use of Natural England's charged service [Pre Submission Screening Service](#) for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See [Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning](#) for details of the LONI process.

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for great crested newts

The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).

If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN.

The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.

By demonstrating that the DLL scheme for GCN will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures

- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

Natural England maintains the [Ancient Woodland Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

Biodiversity net gain

The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025. This includes the intertidal zone but excludes the subtidal zone (an approach to marine net gain is being developed but this will not form part of mandatory BNG). Projects that span both offshore and onshore will be subject to BNG requirements for the onshore components only. Some organisations have made public BNG commitments, and some projects are already delivering BNG on a voluntary basis.

Landscape

Landscape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology

set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by LI and IEMA. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

Connecting people with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Soils and agricultural land quality

Natural England notes the ALC surveys currently proposed only encompass the panelled area of the development. We advise that the full red line boundary should be subject to surveys.

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

The following issues should be considered and, where appropriate, included as part of the ES:

- The degree to which soils would be disturbed or damaged as part of the development.
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

Air quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts of air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Designated sites within 200m of a road which will experience a significant increase in traffic movements should be assessed for impacts due to air pollution from traffic. When

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

undertaking an assessment of the potential impacts during the construction or operation phase of the development there will need to be clarification provided on which roads will be used to access the development site, and the number of predicted vehicle movements. Natural England has produced [guidance](#) for assessing the impacts of air pollution due to traffic.

Ammonia emissions from road traffic could make a significant difference to nitrogen deposition close to roads. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road) – catalytic converters may aid in reducing NO_x emissions but result in increased ammonia emissions – therefore consideration of the potential for impacts is needed (see [https://www.aqconsultants.co.uk/news/february-2020-\(1\)/ammonia-emissions-from-roads-for-assessing-impacts](https://www.aqconsultants.co.uk/news/february-2020-(1)/ammonia-emissions-from-roads-for-assessing-impacts)).

There are currently two models which can be used to calculate the ammonia concentration and contribution to total N deposition from road sources. One of these models is publicly available and called CREAM ([Air Quality Consultants - News - Ammonia Emissions from Roads for Assessing Impacts on Nitrogen-Sensitive Habitats \(aqconsultants.co.uk\)](#)), and there is another produced by National Highways.

Water quality

NSIPs can occur in areas where strategic solutions are being determined for water pollution issues and they may not have been factored into the local planning system as they are delivered through National Policy Statements.

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

Climate change

Please refer to the [National Policy Statement EN- 3](#) guidance for information on renewable energy infrastructure in relation to climate change.

Officer: Matthew Gillyon

Tel: [REDACTED]

Email: [REDACTED]

22/05/2025

North Lincolnshire Council

www.northlincs.gov.uk

Church Square House
30-40 High Street
Scunthorpe
North Lincolnshire
DN15 6NL

Whitestone Net Zero Ltd

Reference: EN01100020 – Whitestone Net Zero Ltd

North Lincolnshire Council Reference: CON/2025/560

Proposal: Planning Act 2008 (as amended) and The Infrastructure Planning (Environment Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

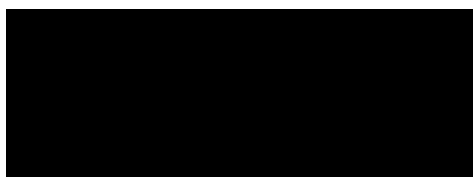
Application by Whitestone Net Zero Ltd (the applicant) for an Order granting Development Consent for the Whitestone Solar Farm (the proposed development)

Officer: Matthew Gillyon

Thank you for your letter dated 24 April 2025 giving North Lincolnshire Council (NLC) the opportunity to comment on the consultation for Whitestone Net Zero Ltd.

I can confirm that NLC has no comments or objections to raise in respect of this project. The proposed development is not likely to result in any significant impact upon North Lincolnshire. Do not hesitate to contact me should you wish to discuss this matter further.

Kind Regards



Matthew Gillyon
Senior Planning Officer
North Lincolnshire Council

From: [Before You Dig](#)
To: [Whitestone Solar](#)
Cc: [Before You Dig](#)
Subject: RE: EXT:EN0110020 - Whitestone Solar Farm - EIA Scoping and Consultation and Regulation 11 Notification
Date: 24 April 2025 13:24:02
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

You don't often get email from beforeyoudig@northerngas.co.uk. [Learn why this is important](#)

Hi

NGN has a number of gas assets in the vicinity of some of the identified “site development” locations. It is a possibility that some of these sites could be recorded as Major Accident Hazard Pipelines(MAHP), whilst other sites could contain High Pressure gas and as such there are Industry recognised restrictions associated to these installations which would effectively preclude close and certain types of development. The regulations now include “Population Density Restrictions” or limits within certain distances of some of our “HP” assets.

The gas assets mentioned above form part of the Northern Gas Networks “bulk supply” High Pressure Gas Transmission” system and are registered with the HSE as Major Accident Hazard Pipelines.

Any damage or disruption to these assets is likely to give rise to grave safety, environmental and security of supply issues.

NGN would expect you or anyone involved with the site (or any future developer) to take these restrictions into account and apply them as necessary in consultation with ourselves. We would be happy to discuss specific sites further or provide more details at your locations as necessary.

If you give specific site locations, we would be happy to provide gas maps of the area which include the locations of our assets.

(In terms of High Pressure gas pipelines, the routes of our MAHP’s have already been lodged with members of the local Council’s Planning Department)

Kind regards,

Donna Casey

Admin Assistant – Customer Operation Support
Northern Gas Networks

Direct line: [REDACTED]

www.northerngasnetworks.co.uk

From: [Martyn Leigh](#)
To: [Whitestone Solar](#)
Subject: Whitestone Solar Farm (your reference EN01100200)
Date: 02 May 2025 14:13:04

You don't often get email from martyn.leigh@oldham.gov.uk. [Learn why this is important](#)

FAO: Emily Park

Dear Emily,

I refer to your letter dated 24 April 2025 concerning a development proposal known as Whitestone Solar Farm which is located to the east of Rotherham. We have this recorded as EIAS/354466/25.

I understand that the applicant has asked the Planning Inspectorate on behalf of the Secretary of State for it's written Opinion (a Scoping Opinion) as to the scope, and level of detail, of the information to be provided in the Environmental Statement relating to the development. You have consulted Oldham Council on this and offered the opportunity to comment.

Thank you for consulting Oldham Council. However, I can confirm that on this occasion the Council has no comments to make.

Kind regards,

Martyn Leigh
Development Management Team Leader



Planning Department
Oldham Council
Spindles Shopping Centre
Oldham OL1 1LA

T: 



Confidentiality: This email and its contents and any attachments are intended only for the above named. As the email may contain confidential or legally privileged information, if you are not, or suspect that you are not, the above named or the person responsible for delivery of the message to the above named, please delete or destroy the email and any attachments immediately.

Security and Viruses: This note confirms that this email message has been swept for the presence of computer viruses. However, we advise that in keeping with good management practice, the recipient should ensure that the email together with any attachments are virus free by running a virus scan themselves. We cannot accept any responsibility for any damage or loss caused by software viruses.

Monitoring: The Council undertakes monitoring of both incoming and outgoing emails. You should therefore be aware that if you send an email to a person within the Council it may be subject to any monitoring deemed necessary by the organisation from time to time. The views of the author may not necessarily reflect those of the Council.

Access as a public body: The Council may be required to disclose this email (or any response to it) under the Freedom of Information Act, 2000, unless the information in it is covered by one of the exemptions in the Act.

Data Protection: The council is committed to ensuring that we are transparent about the ways in which we use personal information and that we have the right controls in place to ensure it is used responsibly and is kept safe from inappropriate access, theft or misuse. Further information on how we use personal information and individual's privacy rights can be found at www.oldham.gov.uk/dataprotection

Legal documents: The Council does not accept service of legal documents by email.

Ravenfield Parish Council

Ravenfield Parish Hall
Birchwood Drive
Ravenfield
Rotherham
S65 4PT
Tel: 07462468050
clerk@ravenfieldparishcouncil.gov.uk

22 May 2025

Ms Emily Park
Environmental Advisor on behalf of the Secretary of State
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Ms Park,

RE: Scoping Consultation – Proposed Development by Whitestone Net Zero Ltd (Ref: EN0110020)

Thank you for the opportunity to respond to the Scoping Consultation relating to the proposed development of the Whitestone Solar Farm by Whitestone Net Zero Ltd.

Ravenfield Parish Council wishes to raise the following key concerns and formal requests to be taken into account in the Environmental Statement (ES) and Scoping Opinion. These points are critical to ensure the full and fair consideration of the impact on Ravenfield in its entirety.

1. Zone of Theoretical Visibility (ZTV) and Visual Receptors

We note in the Scoping Report:

- **8.3.20** – *"The Proposed Development has the potential to cause significant adverse landscape effects during operation due to the change in land use and the introduction of solar PV arrays and associated infrastructure into the landscape, although this is regarded as reversible. The Proposed Development would have a significant effect on existing views, many of which are currently across farmland and rural in character albeit with some influences from scattered dwellings, settlement and infrastructure"*
- **8.3.66** – *"The issue to be considered in RVAA is not whether there would be any change in a view from a private property as a result of the Proposed Development, but whether the effect is of such a nature and / or magnitude that it potentially affects the quality of life for the resident"*

There is no doubt that this development will negatively impact the quality of life for a substantial proportion of Ravenfield residents, through landscape and visual changes.

- **Visual Receptors** - 8.3.58 The scoping report at present mentions Old Ravenfield - we request as the Parish Council this is extended to the entirety of Ravenfield and as such visual receptors included within the scoping report.
The Topography of Whitestone 1 is essentially a valley - Residents of Ravenfield enjoy utilising the land on which this project is proposed.

The view of many Ravenfield residents is across the valley of Conisbrough Parks - this will be massively affected.

There are not enough view points within Ravenfield to appreciate the impact this project will have on the residents - the viewpoints need to be revisited and increased so the full impact of this project can be appreciated especially as within the scoping report.

2. Proposed Air Quality Study Area (Topic 13.3.3)

- Request for inclusion of human receptor using POW within site.
- Request for animal receptor using POW within site.
- Increase of distances to be analysed - this is a huge site would suggest same as Zone of Theoretical visibility (5KM) the present study area seems very small in relation to the vastness of the project.

3. Noise Assessments/Vibration (Topic 15)

- Request that the noise assessment area be extended to include all of Ravenfield, to ensure not adversely affected.
- Request that vibration studies be conducted on grazing animals.

4. Potential Impacts on Ground Receptors (Topic 17.2.10)

- Request that the entire Ravenfield parish be included, not just Old Ravenfield, as we consider the impacts will extend further than currently scoped.

5. Cultural Heritage / Setting

The proposed development is situated on land formerly used as Anglo-Saxon hunting grounds associated with Conisbrough Castle, a Schedule 1 heritage monument.

- A viewpoint from Conisbrough Castle must be included. Table 9.1 of the Scoping Report identifies the Castle as a heritage asset "most at risk from adverse setting changes", yet no viewpoint has been allocated.

6. Water Quality and Flood Risk

We are particularly concerned by points in Summary 11.4 regarding potential water quality effects.

- Clarify whether watercourses within the Whitestone 1 site connect to or influence those in Ravenfield or Old Ravenfield.
- Include any areas prone to flooding (such as parts of Old Ravenfield) in all water impact and flood risk assessments.

7. General Concern: Inadequate Time for Review

While we are providing this response, we must state that the time frame allowed for consultation is too short to meaningfully analyse such a comprehensive proposal.

Please note that our feedback is not comprehensive and may not address all aspects.

Ravenfield Parish Council strongly urges that Ravenfield in its entirety, not just Old Ravenfield, is considered in all assessments. The scale and impact of this proposal are vast and require equally comprehensive analysis.

We trust our comments will be considered seriously as part of the Scoping Opinion process. Should you require further clarification, we are happy to engage further.

Yours sincerely,



Gemma O'Carroll
Clerk to Ravenfield Parish Council

Please note: This correspondence has been sent by email only to the address of:
WhitestoneSolarfarm@planninginspectorate.gov.uk No hard copy will follow.

COUNCILLOR MARNIE HAVARD

Ward member for Wales

Date: 20/05/2025

Ms. Park

Environmental advisor on behalf of the Secretary of state

The Planning Inspectorate

Environmental Services Operations Group

3 temple quay

2 The Square

Bristol

BS1 6PN

Dear Ms. Park,

Re: Planning Inspectorate Reference - EN0110020

Application by Whitestone Net Zero Ltd for Development Consent for the Whitestone Solar Farm.

I am writing to you in my capacity as a Ward Councillor for Wales ward to express my concerns and to provide local insights regarding the above application and the associated scoping consultation.

1. Impact on Local Communities and the Role of Local Authorities

The proposed Whitestone Solar Farm is a large-scale infrastructure project with potentially significant impacts on multiple communities across several boroughs. As a ward representative, I am concerned that the scale and complexity of this development may hinder meaningful engagement with local authorities and communities.

Local councils, including ward-level representatives, are vital in providing detailed insight into local issues—ranging from environmental concerns to social and economic impacts—that may be overlooked in national or regional planning processes. Given the size of this project and the number of communities affected, I am worried that individual local voices may not be adequately heard or considered.

www.rotherham.gov.uk/wales-ward

Rotherham
Metropolitan
Borough Council



2. Geographical Scope and Fragmentation of the Development

The application spans multiple boroughs and covers a wide geographical area, with parts of the development located some distance apart. The lack of apparent physical or functional cohesion raises questions about whether this should be treated as a single development or multiple separate schemes.

From a local perspective, the areas affected do not appear to be interconnected or interdependent, other than their connection to the regional power grid. This fragmentation risks diluting local engagement and scrutiny, and it seems more appropriate to consider dividing the application into smaller, more manageable sections that reflect local boundaries and community interests.

3. Capacity of Local Authorities and Engagement Challenges

Small local authorities and ward offices often operate with limited resources—staffing, time, and expertise—to scrutinize large-scale developments effectively. I am concerned that Rotherham Metropolitan Borough Council, along with other local authorities, may lack sufficient capacity to engage thoroughly with this extensive project.

Furthermore, recent communication from the developer, including scheduled online sessions with fixed dates and the refusal of additional engagement opportunities, limits meaningful consultation. I strongly urge that the developer commits to ongoing, accessible, and transparent engagement with all relevant local authorities and communities throughout the process.

4. Cumulative Impact of Development and Effects on Residents' Well-being

Our village has been subjected to a relentless barrage of development over the past ten years, including fracking protests, housing developments, infrastructure projects associated with the Canal & River Trust, and works by Northern Powergrid and Yorkshire Water. This ongoing proliferation of projects has taken a toll on our residents' mental health, contributing to stress, anxiety, and a sense of being overwhelmed.

Adding a project of this scale—the Whitestone Solar Farm—only compounds these issues. The cumulative disruption from numerous developments is already affecting community cohesion and residents' well-being. We are deeply concerned that further large-scale infrastructure, especially when poorly coordinated or poorly communicated, will exacerbate these mental health challenges and diminish our community's resilience.

5. Effects on Local Tourism and Community Assets

Our ward boasts a variety of fantastic attractions that contribute significantly to local tourism and the broader economy. These include Gulliver's Theme Park, Rother Valley Country Park, active cycling groups, and the Waleswood Camping Site. Additionally, our rich Domesday history draws visitors from all over the country, helping to promote our area's heritage and rural appeal.

These elements are all part of the larger Rother Valley initiative, which the council has heavily invested in to grow tourism, celebrate our beautiful rural setting, and support local businesses. The enormity of the proposed solar farm risks undermining these efforts, potentially damaging our area's future as a vibrant tourist destination. Any development that impacts landscape character, access, or tranquillity could threaten the economic sustainability of these attractions and the community's quality of life.

I also want to highlight that the council has recently funded an accessibility study in Harthill, working closely with the Harthill active travel and SYMCA, to improve connectivity throughout our ward. The last thing we want is for all our walking and cycling routes to be blighted or blocked by solar panels across the majority of my ward. Protecting these routes and ensuring they remain accessible and safe is vital for our community's health, well-being, and continued tourism appeal.

I strongly urge that the Environmental Impact Assessment fully considers the potential adverse effects on tourism, local assets, and connectivity. Preserving our rural character and access routes is essential for our community's sustainable future.

6. Visual and Landscape Impact

The viewpoint map included in the scoping document appears to be based predominantly on desk-based analysis, with limited on-site assessment. Given the importance of landscape and visual amenity—especially in rural settings—I recommend that the developer undertake comprehensive field assessments to accurately identify key viewpoints, including those valued by local residents. A thorough Landscape and Visual Impact Assessment (LVIA) is essential to properly evaluate potential impacts.

7. Heritage and Water Management

Harthill Reservoir, constructed in the 1770s to supply water to the Chesterfield Canal, remains an important part of regional water infrastructure and heritage. Its continued operation underscores the interconnectedness of local rural infrastructure and cultural history.

Given the potential for runoff from solar infrastructure, I request that the Canal & River Trust be added as a statutory consultee if they have not already been engaged, to ensure that historic waterways and water management systems are adequately protected.

8. Lack of Specific Infrastructure Details

At this stage, the exact locations of key infrastructure components—such as the proposed battery storage facility—have not been confirmed. This lack of detail limits our ability to fully assess environmental impacts and the scope of the Environmental Impact Assessment.

9. Cumulative Impacts and Community Disruption

Our communities have already experienced substantial disruption from recent projects, including wind farms and power cables. The scale of this proposed development, if treated as a single scheme, could exacerbate these impacts and further fragment our community's landscape.

Conclusion and Request

Given the scale and potential impact of this project, I strongly urge the Planning Inspectorate to consider dividing the application into smaller, geographically coherent sections. This approach would enable more meaningful community engagement, more accurate assessment of impacts, and better protection of our local environment and economy.

Our area's future relies on balancing sustainable development with the preservation of our unique assets. I trust that the Inspectorate will take these local considerations into account to ensure a fair and transparent planning process.

Thank you for your attention to these matters.

Yours sincerely,

Cllr Marnie Havard

Ward Councillor for Wales Ward

Rotherham borough council

Our Ref: RB2025/0603

Request for a Scoping Opinion under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) in respect of an application by Green Nation for an Order granting Development Consent for Whitestone Solar Farm.

Rotherham Metropolitan Borough Council Consultee Responses:

Consultee	Comments
Cumulative Impact – Development Management	Chapter 18 of the Scoping Report considers the approach to Cumulative Effects of the development, which is welcomed. Having regard to Stage 3 – Information Gathering, it is of note that the Council have received a number of planning applications and requests for screening opinions for a number of solar farms and battery energy storage systems close to the boundary of the Whitestone development. These are mapped at Appendix 1 and include a supplementary table outlining the development proposals and decision status. Given the proximity of these, together with the scale of the Whitestone development, the applicant should be encouraged to take these proposed and committed developments into consideration, particularly with regard to the relevant disciplines outlines at paragraph 18.2.2 of the Scoping Report.
Spatial Policy & Ecology	Planning Policy Context <u>Local Policy</u> The Council has carried out partial update of the Core Strategy last year. Nevertheless, the Council has revised its LDS in light of the NPPF published in December 2024 and the increase to the housing target for Rotherham. The new timetable has been provided to MHCLG as requested by the Deputy Prime Minister's letter to all LPAs. However, the LDS has still to be approved by the Council and so is not yet in the public domain. The LDS is programmed to be considered at the Cabinet meeting and for Council approval in due course. Once approved, the LDS will be published on the Council's website. Details of the new timetable will be included in the Cabinet report, which will be published 10 days before the meeting. <u>Biodiversity and Nature Conservation</u> The Council's ecologist confirms the biodiversity section (Chapter 7) of the Environmental Scoping Report is satisfactory. It is noted that the Rotherham Biological Record Centre has been contacted and the

biological records will be used in decision making. Other potential guidance that could be referenced is the South Yorkshire Natura Capital and Biodiversity Mapping report [Natural Capital Solutions, July 2021] that has been carried out in advance of a Local Nature Recovery Strategy being written.

This section has not acknowledged the policies in the Sites and Policies Document or the SPD11: Natural Environment.

It is acknowledged that Habitats Regulations Assessment (HRA) will be prepared for the proposed development. However, the HRA and other evidence documents for Rotherham's policy documents (Core Strategy, Sites & Policies and Core Strategy Partial Update) should be considered as part of the data source.

Please note the designation of Local Sites (LWSs and RIGs) are regularly reviewed and the latest information is available on the Council's Natural Environment webpage.

Landscape and Visual

The Local Planning Policy section has not acknowledged the policies in the Sites and Policies Document or the SPD14: Trees.

Cultural, Heritage and Archaeology

The Local Planning Policy section has not acknowledged the policies in the Core Strategy Document (CS23).

As part of the local listing, the Council has been working collaboratively with other South Yorkshire local planning authorities on the South Yorkshire Local Heritage List and the Council has also formally adopted Rotherham heritage assets as part of the Rotherham Local Heritage List.

The Council has adopted the Rotherham Heritage at Risk Strategy and the Register is regularly updated. South Yorkshire's Historic Environment Characterisation report is available on the Archaeology Data Service. These should be acknowledged and considered as part of the data source.

Ground conditions and Land Quality

Natural England has previously commented on the Priorities and Measures to be included with the South Yorkshire LNRS:

Reduce soil compaction to improve soil structure and increased water infiltration by ensuring the right machinery types are used and its usage is appropriate, and by ensuring appropriate stocking rates.

The Local Planning Policy section has not acknowledged SPD15: Preparing a Soils Strategy (Adopted July 2023).

	The Technical Guidance for Developers, Landowners and Consultants prepared by Yorkshire and Lincolnshire Pollution Advisory Group (July 2023) should be included as a data source. <u>Water Resources and Flood Risk</u> The Local Planning Policy section has not acknowledged policies in the Sites and Policies Document. <u>Climate Change and Greenhouse Gas Assessment</u> The Local Planning Policy section has not acknowledged Core Strategy Policy CS30. <u>Air Quality</u> This section has not acknowledged the relevant policies in the Core Strategy (Policies CS27, CS28, CS30) and Sites and Policies Document (Policies SP52, SP55, SP57). <u>Traffic and Transport</u> The Local Planning Policy section has not acknowledged policies in the Sites and Policies Document and SPD12: Transport Assessments, Travel Plans and Parking Standards (Adopted June 2021)
Landscape Service	Please note these comments relate only to the scoping of landscape and visual matters and are based on the information submitted by the applicant to the Planning Inspectorate. In compiling these comments, the following submission documents have been reviewed:- • Main Scoping Report. • Figures - Appendix A. • Scoping Table – Appendix B. • Landscape Mitigation and Commitments Register – Appendix C. • The Landscape and Visual baseline and methodology - Appendix D <u>The Site</u> The sites lies within greenbelt and covers an area of 1400 hectares and extends from Conisbrough in the north and Kiveton park/ Wales in the south. The development comprises three main sites – Whitestone 1 (W1) located south of Conisbrough (centred on National Grid Reference (NGR) SK 505963), Whitestone 2 (W2) located between Aston in the west and Dinnington in the east (centred on NGR SK 476874) and Whitestone 3 (W3) located south of Wales and Kiveton Park (centred on NGR SK 481808) <u>Planning Policy</u> Section 2.4 Local Planning Policy of the Main Scoping report makes no mention of Rotherham Sites and Policies document of the Local Plan (Adopted June 2018) and only refers to the Core Strategy Policy

Document (Adopted September 2014). For this reason, the applicant incorrectly refers to Rotherham's Area of High Landscape Value – which were not retained following the Local Plan Examination for the Sites and Policies Document. Rotherham Sites and Policies document SP 32 Green Infrastructure & Landscape (Section 4.156 Page 88-92) sets out the Council's policy approach to Landscape character areas and their Landscape sensitivity. Landscape Character Areas and their sensitivity are identified on inset policies map 4 within SP32 page 90).

Scope of the LVIA

The scope of the study is presented as 5km offset from the site development boundary.

For context the scope of the study area for Penny Hill wind farm (comprising turbines of 120m high) was also 5km. The general approach taken with NSIP development is to focus on identifying those locations where there is potential for significant effects (positive or negative) to be experienced. From smaller scale Solar developments of the same height, it can be demonstrated that the magnitude of visual effects reduces as the distance from the development increases.

Landscape and Visual assessment – methodology

The applicant sets out in section 8.2.10 of the scoping report the specialist discipline guidance documents which will apply to the Landscape and visual impact assessment.

The key guidance publication which sets out the establishment methodology for carrying out landscape and visual impact assessments is "The Landscape Institute and Institute of Environmental Management and Assessment (April 2013) Guidelines for Landscape and Visual Impact Assessment, 3rd edition" (referred to as GLVIA). I have reviewed the applicants proposed methodology for their landscape and visual assessment and this is in line with industry guidance - GLVIA.

ZTV and Viewpoints

All viewpoints identified have been informed by an initial Zone of theoretical Visibility study (ZTV) with a scope of 5km. The majority of the initial Viewpoints identified are within 1 to 1.5km of the site boundary. A number of additional viewpoints have been identified and are requested to be included/ as part of the LVIA. I would also expect the applicant to adjust and review the viewpoint locations during their field assessments and to test out the ZTV and identify any additional locations not already listed from which significant effects may be experienced.

Figure	Area	Location	Description
8.2	W1	Ruddle Lane junction with Green Baulk & Shiphall Baulk looking South	Additional viewpoint representative of potential views from Old Edlington.

	8.3	W2	VP19 is the far side of a disused railway which is in cutting.	Relocate to Laughton Common Road nr entrance to Lake View Fisheries entrance.
	8.3	W2	VP20	Consider extending as a sequential viewpoint between VP 20 and the junction of Common Road and Todwick Road.
	8.3	W2	VP 42 North-eastern edge of Aughton	Additional viewpoint or alternative viewpoint at B6067 Burgoyne park recreation ground. Or Ulley Lane nr entrance to South Yorkshire Woodland Burial Ground.
	8.4	W3	Killamarsh Lane	Additional viewpoint requested.

Landscape and Visual Scoping

I have reviewed the Landscape and Visual Scoping table (8.4) and concur with the applicant's initial identification of receptor groups and the general rationale for scoping in or out of sub-topics. For completeness the key sub-topics or receptors scoped out are :-

Receptor Group	Rationale for scoping out
Landscapes subject to statutory designation	No National Parks or National Landscapes within the study area.
Landscapes subject to non-statutory designation	No local landscape designations within the study area
Local landscape character areas outside of the study area	Landscape Character Areas that lie at the periphery of the Study Area or have no intervisibility or interconnectivity with the Site have been scoped out as it is considered the Proposed Development would have no or limited indirect adverse effects upon their character.
Visual receptors using public rights of way within the Site Boundary	PRoWs which cross the Site will be temporarily closed during the construction phases and will therefore be scoped out of the LVIA at construction and decommissioning stages. But included for assessment of operational effects.
Visual receptors using public rights of way or other public outdoor locations within the Study Area where the	Where the ZTV has identified no visibility then no effect would occur or if there is potential visibility this would not be significant.

	ZTV demonstrates no visibility	
	Visual receptors at public locations outside of the Study Area	Views may be possible beyond the Study Area. Where visible, it is considered that the Proposed Development would not be readily perceptible or is unlikely to result in significant adverse visual effects given consideration of the distance, intervening screening and context of existing views.
	Visual receptors: workers on the land or private outdoor recreational locations	Workers and those involved in a certain outdoor activity e.g. sports are unlikely to be focused upon views and any adverse effects upon their views would not be significant
	Cumulative Effects of similar developments without intervisibility or outside of the Study Area	Where developments are outside the Study Area and / or have no intervisibility with the Proposed Development would not result in significant cumulative effects so would be scoped out.
	Night-time effects and / or lighting effects	The Site would not be routinely lit during operation with lighting restricted to periods of maintenance or emergencies, and where used it would be limited to low level security lighting. There would be some lighting required during construction / decommissioning normal working hours, but this would be managed in accordance with best practice guidance. Short periods of 24-hour construction may require lighting (e.g. trenchless crossings)
	Residential Visual Amenity Assessment for properties within 250 m of the Proposed Development.	As the Proposed Development's design progresses it will be reviewed to consider residential properties in proximity to the Proposed Development. If it is likely that visual change would materially affect residential amenity then a separate RVAA would be undertaken. Construction and decommissioning impacts would be for a short duration so are scoped out of the RVAA.
	Residential Visual Amenity Assessment for properties beyond 250 m from the Proposed Development.	The Proposed Development would comprise structures that are of relatively low height, and which are not located in proximity to residential properties. Views of the Proposed Development beyond 250 m would be unlikely to result in visual change that would materially affect residential amenity

Report Figures

The following figures are identified as relevant to landscape and visual matters. I have also included 16.4 Public rights of Way and Open Space which I think is relevant to aid with identifying receptors of moderate sensitivity in pursuit of enjoyment of the landscape. As part of the Council's statutory duty to co-operate, the applicant should be provided with the relevant shape files for green space layers held by the council.

Figure 8.1	Study Area and Preliminary ZTV - Overview
Figure 8.2	Preliminary ZTV –W1 – Study Area
Figure 8.3	Preliminary ZTV – W2 – Study Area
Figure 8.4	Preliminary ZTV – W3 – Study Area
Figure 8.5	Landscape Designations
Figure 8.6	Landscape Character Areas
Figure 16.4	Public rights of Way and Open Space.

Figures 8.1 to 8.4 inclusive - Observer eye level height is set at 2 metres above the ground. GVIA 3rd edition sets out Observer eye level height of between 1.5m and 1.7m above ground level should be assumed. This is based on the midpoint average of heights for men and women in the UK.

Figures 8.2 - 8.4 inclusive - additional and /or alternative viewpoints requested.

Figure 8.5 – Areas of High Landscape Value local landscape designation no longer exists.

Figure 8.6 Landscape Character Areas – the key for identified landscape character areas within Rotherham area diverge from the adopted Landscape Character Area descriptions identified in the adopted document. Corrected list is given in A full list of local Landscape Character Areas is given in the Sites and Policies Local Plan document , SP32 (Table 13 page 91) and listed below.

Rotherham Local Landscape Character Areas	
1a	Wentworth Parklands - Core
1b	Wentworth Parklands - Fringes
2	Dearne Valley Floor
3a	Wath and Swinton Farmlands
3b	Wath and Swinton Farmlands – Railway Triangle
4	Don Valley Floor
5a	Coalfield Tributary Valleys - Thrybergh
5b	Coalfield Tributary Valleys - Treeton
5c	Coalfield Tributary Valleys - Canklow
6	Rother Valley Floor
7	Rother Valley reclaimed Woodland
8	Central Rotherham Coalfield Farmland
9a	East Rotherham Limestone Plateau

	9b	East Rotherham Limestone Plateau - Maltby Colliery
	10a	Sandbeck Parklands - Core
	10b	Sandbeck Parklands - Fringes
	11	Ryton Farmlands
	<u>Landscape mitigation and Biodiversity net gain (BNG)</u> BNG will apply to NSIP projects from November 2025 and the applicant timeline would involve a formal submission in 2026 and so the applicant is working on the basis that BNG 10% will apply and will need to be incorporated into the mitigation proposals along with any landscape mitigation to minimise landscape and visual effects. Further details are set out in their Commitments Register (CO1-C03) which are in line with Landscape Policy requirements in SP32 of Sites & Policies Document. <u>Summary</u> I have reviewed the information submitted by the applicant and have identified the following key issues which require addressing:- • ZTV – eye level height at 2m is outside of the parameter set out in GLVIA 3rd edition, which sets out an eye level height of 1.5 to 1.7m. • Additional viewpoints identified and requested. • Errors and inconsistencies identified in relation to Landscape Character Area descriptions. • Additional greenspaces layers to be added to the Public Rights of way and open space figure. • Planning policy context omits reference to Sites and policies document which forms part of the local plan including the policies maps. • AHLV – no longer a local landscape designation. A Landscape and visual assessment will be required to form part of the Environmental Statement for the development. This is so that the significant effects arising from the development can be identified, understood and carefully considered in the planning balance by the Planning Inspectorate.	
Listed Building and Conservation	The proposed methodology relating to assessment of heritage assets is noted (Chapter 9 onwards). The data sets identified at this stage include, Listed Buildings and Conservation Areas, as well as Registered Parks and Gardens, and Scheduled Monuments. A 1km radius search area is identified for all designated and non-designated heritage assets, and 3km for indirect effects (setting) to designated assets as well as selected non-designated assets.	

	This search area should be increased to the higher-grade designated heritage assets Grade 1 and Grade II* to 5km. In particular, the following buildings: • Church Of All Hallows Grade I 1 km Easting 449368 Northing 380962 • Church Of St Helen Grade I 1 km Easting 443251 Northing 387710 • Church Of St James I 1 km Easting 451964 Northing 383705 • Church Of St Giles II* 1 km Easting 446120 Northing 380966 • Church Of St Peter And St Paul II* 1 km Easting 449746 Northing 384126 • Church Of St John The Baptist II* 1 km Easting 447757 Northing 382683 • Church Of St John The Baptist II* 1 km Easting 448403 Northing 397066 • Aughton Court II* 1 km Easting 446904 Northing 385182 The identified Grade 1 and Grade II* Listed buildings within the 3km search area would need to be assessed up to a distance of 5 km from the edge of the development area. Particular concerns relate to the setting of the Grade I Listed Church of All Saints in Laughton-en-le-Morthen, whose spire is a very significant local landmark. The locations of the BESS and the Sub Stations should also be detailed on the reports and their impact on the designated and non-designated heritage assets should be assessed accordingly. RMBC have adopted a Local List of non-designated heritage assets which is attached at Appendix 2. This should be assessed within the appropriate search areas
Drainage and Flood Risk	Careful consideration into flood risk should be considered, a number of locations that are sited within the redline boundary are within flood zone 3 and the areas are utilised for wetlands or flood storage areas. Rotherham Council have 6 priority flood schemes that are currently being designed and due for construction within the upcoming years. One of the capital schemes is sited within Upper Whiston and these areas are to be used for flood storage within extreme weather events. The scheme also proposes some natural flood management features through Whiston Forge Cricket Ground and Revel Wood. These areas falls within the red line boundary for the solar farms. Further information around the scheme can be found at https://www.rotherham.gov.uk/water-management-flooding/the-6-priority-flood-alleviation-schemes.

	Other locations are also within surface water flood risk areas. All sites that could be affected by flooding should have flood resilience measures and be constructed above the known flood levels where feasible. If additional impermeable areas are to be created surface water attenuation will be required on site and greenfield run-off rates will need to be calculated and used for discharge.
Public Rights of Way	I can confirm that the rights of way data is correct, and that definitive rights of way are shown on their correct legal lines. I have had a look through our register of Definitive Map Modification Order applications (to vary the status or add any routes to the Definitive Map) and checked whether any fall within the site boundaries of Whitestone Solar Farm. Two DMMO claims fall within the site boundaries as shown on Figure 3.11 in the report. PROW/C/66 (Appendix 3) - There is a claim to upgrade Ulley Bridleway No 6 to a byway open to all traffic (BOAT) located between Morthen Lane and Penny Hill Lane in Ulley PROW/C/67 (Appendix 4) – A claim to record a by way open to all traffic along Carr Lane in Ulley I have also attached PROW/C/40 (Appendix 5) which do not fall within the site boundary but lies within the buffer zone. PROW/C/40 is located in Ravenfield Park which is adjacent to the site boundary. This does not preclude further requests for Modification Orders that may be submitted by the public in due course. With such a significant development, there are always opportunities for improving public access, and I am mindful of the British Horse Society policy on solar farms (attached) which, whilst I am sure the developer is aware of, but which is worth reiterating in my observations, namely: Large developments are opportunities for increasing access, particularly those which contribute to community funds. There may be chance to upgrade a footpath to bridleway or to gain an additional route. Even very short links can have important effects by enabling greater or safer use of existing routes in an area. It should not be necessary to divert a bridleway or restricted byway (a byway open to all traffic cannot be diverted under normal circumstances) as arrays can be arranged around the route. However, this could significantly reduce the number of panels that can be accommodated and there may be a proposal to divert a route to the edge of the site. In some cases, this may be acceptable if it provides a more advantageous route, but not if it is less convenient or

attractive to users. Diversions should be avoided, unless the proposal is more desirable than the existing route as the solar farm is a temporary structure. If it is essential to divert a convenient route, consideration should be given to it reverting to the original line on expiry of the planning permission for the solar farm.

And that:

Routes for construction traffic should avoid passing along or across equestrian routes, including byways and bridleways. Where such use is unavoidable, provision of safe alternatives for the duration of the development, or protection of the equestrian access, should be in place.

- Existing bridleways, byways or other highways across the land should be provided for at no less than 5m width between fences.
- Inverter housing should be constructed to avoid sound transmission and sited away from bridleways and byways to ensure operational noise and maintenance is at a distance.
- Additional opportunities for equestrian access should be considered.

In such a large development, I can see a number of opportunities for creating new access to enhance existing rights of way nearby, not just for riders, and I would like the developer to work with the rights of way team and RMBC's Local Access Forum (an independent statutory consultee on access made up of interested members of the public) to see what enhanced access is feasible for the local community.

Temporary Closures

Due process allows the developer to request temporary closures of rights of way for up to 6 months, RMBC can extend these closures for up to a further 12 months but beyond that further requests to extend temporary closures are referred to the Secretary of State who may refuse to extend the closures. We would look to the developer to provide alternative routes wherever possible for such temporary closures.

Diversion of Public Rights of Way

Our advice in relation to any development is to seek to incorporate (and if feasible improve) existing rights of way, however, the developer will be aware that facilities exist to apply for public path diversion orders using due process. Such diversions are open to public consultation and objection and, if the council receives objections it cannot resolve, must forward the order to the Secretary of State to determine if a public inquiry is necessary. We are aware that the waiting time for such inquiries can go into a number of years and seek to avoid this necessity if we can. Our advice to developers is to involve the rights of way team and we will involve local relevant parties in discussions. Quite often meetings to explain what is proposed and to listen to local concerns and suggestions are of very considerable benefit and we would be delighted to facilitate such an approach if any orders are deemed necessary. Due processes have fees attached.

	Access for All RMBC remains committed to providing – where reasonable – access for all. In some cases this can be as simple as retaining surfacing which may, for example, be used for construction traffic. As detail moves forward I will provide further comments which I hope the developer will be able to take forward. Provision of easy access, particularly in light of the huge increase in accessing public rights of way since Covid, is something we would wish to see such a large development embrace where reasonable. Summary • Rights of way data within the documentation provided is correct at the time of our observations. The DMMO requests we have on file will require landowner consultation and potential orders may be made to vary the status of the routes, due process is slow and these matters will be ongoing until the council determines the claims accordingly. These matters are open to public consultation. • That bearing in mind the restricted network of bridleways generally, that the developer pays close attention to the BHS guidance and seeks to adhere to it. • That due process is noted and that charges for such processes are made by RMBC. • In such a large development, I can see a number of opportunities for creating new access to enhance links to existing rights of way nearby, and I would like to work with RMBCs Local Access Forum (a statutory consultee on access) and the developer to see if such access is feasible. I would suggest a meeting with ourselves, the LAF and developer at an early stage would be extremely helpful in assessing the network, both from a formal viewpoint and from the independent viewpoint of the LAF. We would be happy to facilitate such a meeting at the developer's earliest convenience.
Transportation Service	Once operational, Solar Farms generate very little traffic on the local road network, with the main vehicular movements being associated with infrequent maintenance visits. On this basis, the principle of the solar farm use would not raise any concerns over road safety. The main trips associated with the site would occur during the construction phase. Therefore, a Transport Statement / Construction Management Plan would need to be provided to show how the impact of construction traffic would be mitigated against on the local road network. In addition, details of any proposed site access would be required for assessment to ensure it is safe and suitable and comply with industry standards.

Air Quality	As part of my assessment, I have reviewed the following document: 1. Whitestone Solar Farm - EIA Scoping Report – prepared by Environmental Resources Management Limited, dated April 2025, Volume 1, Reference EN0110020 These comments outlines my general response to the Environmental Impact Assessment (EIA) Scoping Report submitted for the proposed 1,370-hectare Solar Farm development, which constitutes a Nationally Significant Infrastructure Project (NSIP). Community and Environmental Protection There is likely to be a significant adverse impact or loss of valuable agricultural land as farmland will be taken out of production for 40 years, and at the end of this period there is no guarantee what state the land will be in and how the land will be restored to agricultural use. Wildlife can have their habitats affected and traditional routes blocked by solar farms. Bat behaviour has been shown to be affected by solar farms in recent research. Collisions between birds and solar panels or infrastructure are a significant concern. Several factors contribute to these collisions, including the reflective surfaces of solar panels that birds often mistake for open sky or water. The impact of bird collisions on bird populations and ecosystems cannot be ignored. These incidents can result in immediate fatalities or long-term injuries. The scale of this site crosses a number of significant wildlife habitats. Waste and Carbon There are a significant number of Photo Voltaic modules that will need to be disposed of at the end of their lifetime (usually after 20 years) and they will then be classed as toxic waste and cannot be recycled. The panels are partly constructed from toxic and environmentally persistent chemicals. They are not generally re-used or recycled at the end of life and are either incinerated or landfilled. Risk from Fire There is increasing awareness of the susceptibility of lithium-ion batteries to fire and thermal runaway. These comments relate to the potential of the release of toxic gases from a lithium-ion battery fire. With reference to, Toxic fluoride gas emissions from lithium-ion battery fires Scientific Reports (nature.com, (Larsson et al, 2017) ‘an irreversible thermal event in a lithium-ion battery can be initiated in several ways, by spontaneous internal or external short-circuit, overcharging, external heating or fire, mechanical abuse etc. This may result in a thermal runaway caused by the exothermal reactions in the battery, eventually resulting in a fire and/or explosion.
--------------------	---

The consequences of such an event in a large Li-ion battery array can be severe due to the risk for failure propagation. The electrolyte in a lithium-ion battery is flammable and generally contains lithium hexafluorophosphate (LiPF₆) or other Li-salts containing fluorine. In the event of overheating the electrolyte will evaporate and eventually be vented out from the battery cells. The gases may or may not be ignited immediately. In case the emitted gas is not immediately ignited the risk for a gas explosion at a later stage may be imminent. Li-ion batteries release a various number of toxic substances as well as e.g. CO (an asphyxiant gas) and CO₂(induces anoxia) during heating and fire.

At elevated temperature the fluorine content of the electrolyte and, to some extent, other parts of the battery such as the polyvinylidene fluoride (PVdF) binder in the electrodes, may form gases such as hydrogen fluoride HF, phosphorus pentafluoride (PF₅) and phosphoryl fluoride (POF₃). Compounds containing fluorine can also be present as e.g. flame retardants in electrolyte and/or separator, in additives and in the electrode materials, e.g. fluorophosphates, adding additional sources of fluorine’.

Toxicity of gases

With reference to Toxic fluoride gas emissions from lithium-ion battery fires | Scientific Reports (nature.com) the immediate dangerous to life or health (IDLH) level for HF is 0.025 g/m³ (30 ppm) and the lethal 10 minutes HF toxicity value (AEGL-3) is 0.0139 g/m³ (170 ppm). The release of hydrogen fluoride from a Li-ion battery fire can therefore be considered a severe risk.

In the UK, for workplace exposure the 8-hr long-term exposure limit for hydrogen fluoride is 1.5 mg/m³ and the 15 minute short-term exposure limit is 2.5 mg/m³ Compendium of Chemical Hazards (publishing.service.gov.uk) ‘Large amounts of hydrogen fluoride (HF) may be generated, ranging between 20 and 200 mg/Wh of nominal battery energy capacity. In addition, 15–22 mg/Wh of another potentially toxic gas, phosphoryl fluoride (POF₃), was measured in some of the fire tests’ Toxic fluoride gas emissions from lithium-ion battery fires | Scientific Reports (nature.com).

‘Water is the preferred extinguishing agent for a lithium-ion battery fire. One potential problem regarding the use of water mist is that the addition of water may, in principle, increase the rate of formation of hydrogen fluoride (HF)’ Toxic fluoride gas emissions from lithium-ion battery fires | Scientific Reports (nature.com).

Summary

The EIA/ ES should demonstrate that appropriate consideration is given to the possibility of significant loss of farming land and capacity. A robust Risk Assessment Report will likely be essential to ensure risks are fully characterised.

	Additionally, the EIA/ES should report upon contingencies if the companies that operate these sites cease trading which would leave the landowner with the responsibilities of clearing what amounts to toxic waste from their land. Clarity should be provided to the Council and landowners of the risks and what measures are in place to prevent responsibilities passing to the landowner for waste clearance. The EIA/ES should clearly consider in detail the risks presented by thermal runaway and mitigation measures to minimise any risks to human health from explosion, fire or toxic gases, including minimum distances from residential properties of battery storage. An assessment should be carried out by the applicant to establish the likely exposure to gases such as hydrogen fluoride of nearby residents in the event of a fire at the site. An assessment of the water needs of the site to suppress any fires at battery storage sites and this should be in keeping with the recommendations of the North Yorkshire Fire Service guidance. Rotherham MBC Core Strategy Adopted September 2014 (rotherham.gov.uk) CS30 Low Carbon and Renewable Energy Generation states that this type of development can be encouraged provided that there are no unacceptable adverse effects on residential living conditions, amenity and quality of life. A solar farm and BESS on this scale will have an adverse impact on the enjoyment and openness of the Green Belt in the area, on amenity and quality of life for the local communities. The semi-rural appearance of the Borough will be altered for a generation.
Contaminated Land	As part of this assessment, I have reviewed the following document: 2. Whitestone Solar Farm - EIA Scoping Report – prepared by Environmental Resources Management Limited, dated April 2025, Volume 1, Reference EN0110020 These comments outline my response to the Environmental Impact Assessment (EIA) Scoping Report submitted for the proposed 1,370-hectare Solar Farm development, which constitutes a Nationally Significant Infrastructure Project (NSIP). The proposed solar farm will comprise of 3 defined areas, 2 of which will be located within the Rotherham Borough area and 1 will be located in the Doncaster City area. It would appear the combined site areas for this application will be situated upon predominantly agricultural/arable land that is within Green Belt land. However, given the extent of the proposed development area, the site is likely to be affected by historic mining and landfilling. A full review of

historical mapping has not been possible due to the sites scale, limiting our assessment of potential contaminated land risks.

However, given the high likelihood of historic mining and landfilling, we have significant concerns regarding potential land contamination and ground stability risks.

The proposed project is for the development of a solar farm with associated infrastructure. The development is to comprise the following key components:

- Solar Photovoltaic (PV) arrays
- Battery Energy Storage System (s) (BESS)
- On site cabling works (predominantly underground, utilising cable corridors)
- Collector Sub-station (Brinsworth)
- Satellite sub-stations

Conclusions:

From a land contamination perspective, the following points should be considered within the scope of the Environmental Impact Assessment (EIA) /Environmental Statement:

1. Potentially Contaminated Land

The proposed development site spans approximately 3,500 acres. It is recommended that the EIA/ES includes for a comprehensive desk study (for each proposed phase of development) to identify any current or historical land uses across the site that may have resulted in contaminated land. This should include, but is not limited to:

- Former industrial activities
- Agricultural practices (e.g. pesticide and herbicide use)
- Areas of made ground or infilled land
- Historical landfill sites or waste disposal areas - within or adjacent to the proposed development area
- Areas of shallow coal mining which may present instability risks -

Where such uses are identified, these areas should be subject to a Preliminary Risk Assessment to determine the potential for contaminant linkages. A detailed conceptual site model (CSM), employing the source-receptor-pathway methodology to identify potential contaminant linkages should be developed.

Where potential contaminant linkages have been identified, intrusive site investigations may need to be undertaken to determine the potential risks from contamination associated with

past industrial uses of the land and from any potential mining legacies that could impact upon the proposed development site.

As part of the site investigation works, consideration will need to be given to the potential for ground gases such as methane and carbon dioxide, especially in areas with landfill history or coal seams. The EIA/ES should include for the requirements of ground gas risk assessments being undertaken.

2. Battery Energy Storage System(s) (BESS)

The EIA/ES will need to specifically state the proposed location(s) for the BESS and the no. of battery units to be installed, so that an adequate assessment of the potential risks can be undertaken.

The Environmental Risks:

- **Fire and Thermal Runaway** – The EIA/ES must assess the risks associated with thermal runaway, which can lead to fires, explosions and the release of toxic substances.
- **Contaminated Firewater Run-off** – In the event of a fire, contaminated firewater runoff poses a significant environmental risk. The ES should detail containment measures to prevent polluted water from entering soils and watercourses.

3. Protection of Human Health and Controlled Waters

Any potential contamination should be assessed in relation to the proposed construction and operational phases of the development. The EIA/ES should evaluate risks to;

- Construction & maintenance workers
- Site users
- Underlying groundwater or adjacent surface waters, especially if the site falls within a Source Protection Zone or near any water courses

4. Construction Impacts and Potential Mitigation

The EIA/ES should describe the approach to managing any unexpected contamination encountered during construction works. This includes:

- Actions to be undertaken should significant contamination be encountered
- Soil handling, either the reuse or disposal strategies
- Measures to prevent the mobilisation of contaminants (e.g. via run-off, infiltration, dust)

Summary

The EIA/ ES should demonstrate that appropriate consideration is given to the possibility of land contamination across such a large site and potentially varied sites, with unknown/unrecorded land uses. A robust

	Preliminary Risk Assessment Report complete with Conceptual Site Model and Intrusive Site Investigations, will likely be essential to ensure risks are fully characterised, to ensure protection of both human health and the environment during the phasing and development stages of this project. The proposed solar farm and BESS development necessitate a thorough examination of the potential environmental and safety risks. A robust risk mitigation strategy and Bess safety protocols must be developed. Remediation Strategies - Should potential contamination / ground stability / ground gas issues be identified, the EIA/ES must outline remediation strategies to ensure that land contamination risks will be effectively mitigated. It is considered that this response outlines key issues and recommendations to ensure that potential land contamination issues will be adequately addressed in the forthcoming EIA/ES.
Noise	The Scoping Report identifies that emissions of noise from plant and equipment during the construction and operational phases needs to be assessed and included in the Environmental Statement. Section 15.4.5 of the Scoping Report covers construction noise and vibration and section 15.4.8 covers operational noise and vibration from plant and equipment. These sections appear to adequately cover these areas utilising the relevant legislation and guidance documents. Baseline monitoring locations and receptor locations have been identified and agreed with the noise consultant. The following noise criteria has also been suggested to the noise consultant for consideration when undertaking the noise impact assessment, in order to protect residential amenity and to prevent creeping backgrounds. <u>Noise Impact Assessment- Suggested Criteria</u> The noise impact assessment should determine the likely impact of noise from the proposed solar farms and battery energy storage systems on nearby noise sensitive premises. The report should include: • An assessment of all noise emissions from the proposed solar farms and battery energy storage systems • Details of existing background and predicted future noise levels at nearest noise sensitive dwellings as identified and agreed • A written scheme of how the occupants of the above-mentioned noise sensitive premises will be protected from noise from the proposed solar farms and battery energy storage systems. This should include noise attenuation measures as appropriate,

physical or operational to achieve no more than 0dB(A) above the prevailing background levels, outside the boundary of the nearest noise sensitive properties as identified and agreed.

The assessment should clearly detail all sound power levels of equipment including 1/3 octave band data, source height, positioning and orientation of equipment, acoustic character penalties, and uncertainties within the assessment. It also needs to include mitigation measures such as bunds and fence heights and levels of density if applicable. Full calculations of noise reduction that is to be achieved should also be provided. The report should include all raw measurement data and any supporting calculations.

It is also suggested that the following criteria is considered when drafting the construction environmental management plan as mentioned in section 15.4.5 so that all areas of concern are adequately covered.

Construction Environmental Management Plan (CEMP)

The Construction Environmental Management Plan (CEMP) needs to describe in detail the actions that will be taken to minimise adverse impacts on occupiers of nearby properties by effectively controlling:

- Noise & vibration arising from all construction and demolition related activities - Contractors and site staff are expected to use the best practical means to minimise noise on site. Regard shall be had to the guidance detailed in BS5228 2009: 'Noise and Vibration Control on Construction Sites'.
- Dust arising from all construction and demolition related activities - Contractors and site staff are expected to use the best practical means to minimise dust on site. Regard shall be had to the guidance detailed in Institute of Air Quality Management- Guidance of the assessment of dust from demolition and construction 2014.
- Artificial lighting used in connection with all construction related activities and security of the construction site - Contractors and site staff are expected to use the best practical means to minimise light nuisance on site. Regard shall be had to the guidance detailed in the Institute of Lighting Professionals - Guidance Note 01/21 – Reduction of Obtrusive Light.

The CEMP should be in report format and as a minimum should include the following details as specified in the subheadings below:

- Program and Phasing Details
 - Site layout
 - Operational hours

	- Expected duration of demolition and construction work phases • Site Management - Contact details of site manager for public liaison purposes - Complaints procedure - Roles and responsibilities • Routes for Construction Traffic - Routes to be used for access onto site and egress - One way systems - Haul routes (onsite and delivery) • Site Access, Storage and Movement of Materials - Delivery access point details - Location details of storage areas - Delivery times of materials and plant • Dust, Debris and Mud - Screening and hoarding - Preventative measures - Dust suppression measures -General and machinery - Wheel wash facilities - Road sweeping facilities - Covering of dusty stockpiles - Vehicles carrying dusty loads - Dust monitoring - Boundary checks - Monitoring of weather including wind speed and direction, dry conditions etc • Noise and Vibration Control - Silencing of vehicles, plant and machinery - Mitigation measures for noisy operations - Operational hours - One way systems - Vehicle reverse alarms - Leaflet drops to noise sensitive premises • Artificial Lighting - Hours of operation of the lighting - Location and specification of all of the luminaires - Level of maintained average horizontal illuminance for the areas that needs to be illuminated - Predicted vertical illuminance that will be caused by the proposed lighting when measured at windows of any properties in the vicinity
--	---

	- Measures that will be taken to minimise or eliminate glare and stray light arising from the use of the lighting that is caused beyond the boundary of the site • Waste Management - Waste storage - Waste collection - Recycling - Waste removal
Public Health	These comments relate only to the climate change and greenhouse gas emissions implications arising and are based on the information available as at the date of writing. Rotherham Metropolitan Borough Council declared a climate emergency in 2019 and as part of this we agreed a plan of action to reduce greenhouse gas emissions generated by the council and the wider borough. We have since set the following targets: • The council's greenhouse gas emissions to net zero by 2030. • Rotherham-wide greenhouse gas emissions to be net zero by 2040. One of the key themes of our decarbonisation work is energy, which includes improving energy efficiency and supporting the switch away from fossil fuels and towards the development of renewable energy infrastructure within the borough. As such we broadly welcome the proposal for increased renewable generation in the borough. However, we also believe it is essential for local residents to have a say in the transition to a net zero borough, and to also feel the benefits from it. We urge Green Nation and Net Zero One Ltd to fully consider options for community involvement and participation; community benefit schemes and energy discounts for local residents in the forthcoming planning stages. To provide more detailed comments on the Climate Change and Greenhouse Gas Assessment section of the Scoping Report: It is noted the inclusion of table 12.1 (summary of potential GHG emissions sources) on page 192. However, we note that there are some potential sources of greenhouse gas emissions which are absent such as land use change, project set up and downstream transmission and distribution emissions. Other sources of emissions could be more thoroughly scoped, for example: • Which materials and components will be included in the greenhouse gas

- assessment (as a minimum we would expect to see this for the panels and
- the inverters);
- Do the operational emissions include the provision of security;
- What else is included in the decommissioning emissions – for example it is
- unclear if this includes the disposal of waste.
- It is also unclear to us whether the cable corridor is included within the scope
- of the greenhouse gas assessment, and we would expect the construction of
- this route to potentially make up a large proportion of the project's emissions.

A table similar to the table 12.2 on pages 194-195 (climate hazards proposed to be scoped in or out of the climate change resilience review) would be helpful to understand which sources of greenhouse gas emissions have been scoped in or out of the greenhouse gas assessment, and the rationale for this.

In terms of measuring the baseline for the greenhouse gas impact assessment – we are satisfied with the approach proposed however it may be useful to note that there are caveats to measuring the baseline in terms of the displacement of equivalent fossil fuel generation. Removing an equivalent amount of fossil fuel generation from the grid is not within the control of this project. Additionally, the National Grid estimates that electricity use in the UK will more than double by 2050, meaning the project could only be feeding additional demand for electricity.

It is unclear to us whether the greenhouse gas impact assessment and the climate change resilience review are static documents produced at the beginning of the project, or if they will be monitored, reviewed, validated and publicly reported on at regular intervals throughout the duration of the project.

To support RMBC's 2040 net-zero carbon aims, we also recommend the following to be included in the EIA:

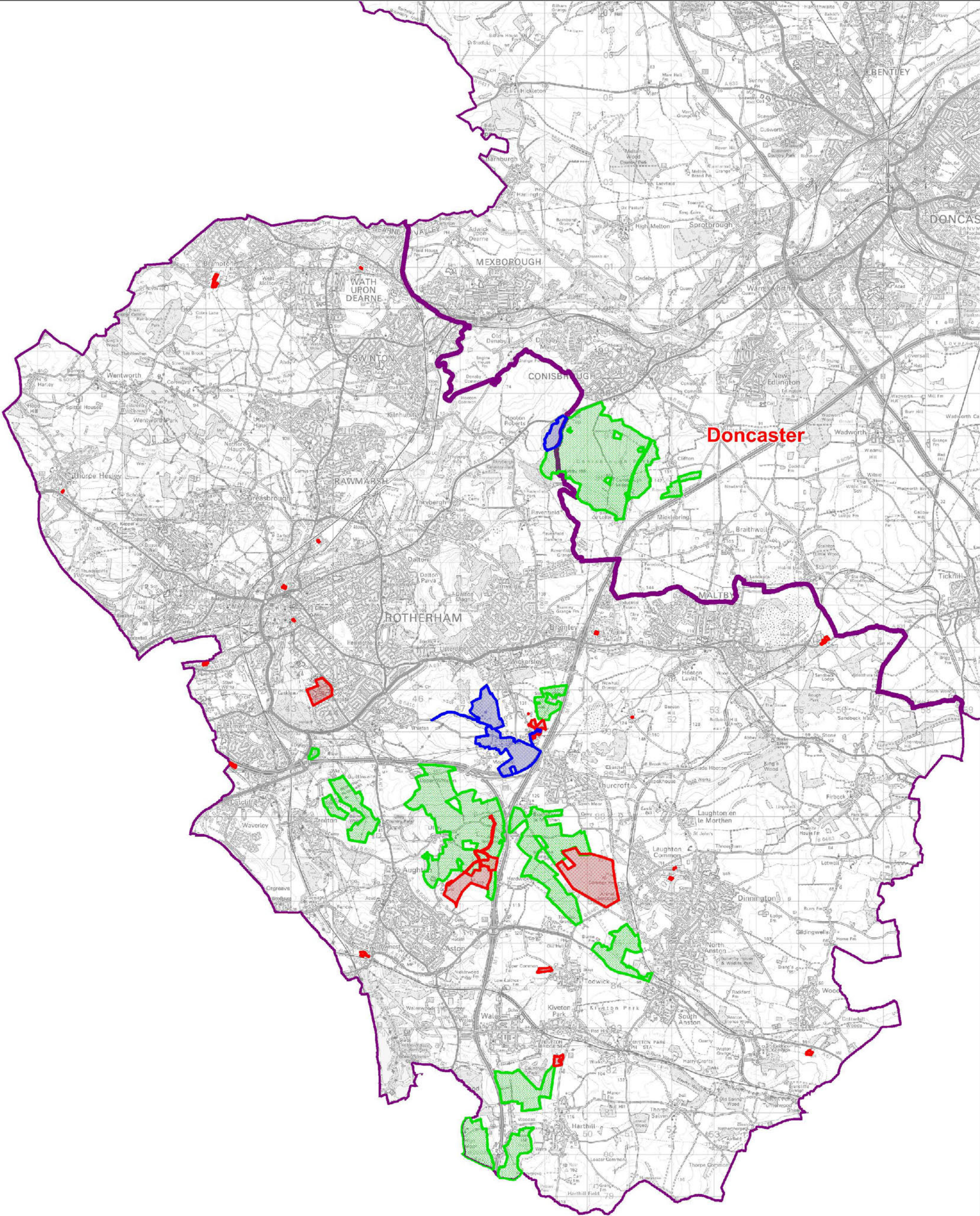
- Include a Greenhouse Gas Saving Estimate: Clearly show how much CO₂ /
- other GHGs the project will save each year, and over its lifetime.
- Provide a Greenhouse Gas Payback Period: Estimate how long it takes to "break even" on construction emissions.

Finally, we understand there is a risk of modern slavery in the solar PV panel supply chain and we suggest that this be scoped into the EIA as a 'wider socio-economic effect', or considered separately as part of a Modern Slavery Transparency Statement.

List Of Appendices:

- Appendix 1 – Map and associated table indicating location and description of solar and BESS proposals.
- Appendix 2 - Local List of non-designated heritage assets
- Appendix 3 – Public Right of Way Plan Ref: PROW/C/66
- Appendix 4 - Public Right of Way Plan Ref: PROW/C/67
- Appendix 5 - Public Right of Way Plan Ref: PROW/C/40

APPENDIX 1



Reproduced from the Ordnance Survey Mapping with the permission of the Controller of His Majesty's Stationery Office (C) Crown Copyright
Unauthorised reproduction infringes Crown Copyright RMBC Licence No 100019587

-  Application Boundary
-  EIA Screening Boundary
-  Whitestone Boundary
-  LA Boundary

Solar Farms and BESS in Rotherham

Produced: 16 May 2025



Planning Policy Team
Riverside House
Main Street
Rotherham S60 1AE

Application_Number	Proposal	Status	Date_Valid	DOE_CAT	SolarFarm_BEES	Decision_Date	Date_Com
RB2011/1478	Installation of 56 No. solar panels to outbuilding	Granted	18/01/2012	10	SolarFarm	20/02/2012	
RB2012/0556	Installation of 16 No. solar panels	Granted	08/05/2012	10	SolarFarm	12/06/2012	
RB2013/1653	Removal of storage unit, renovation and extension of existing pavilion including new pitched roof with 18 No. solar panels to south elevation, and installation of lighting on approach roadway	Granted	13/03/2014	10	SolarFarm	08/05/2014	
RB2014/1619	Installation of solar panels to roof	Granted	06/01/2015	10	SolarFarm	11/02/2015	
RB2015/1084	Proposed installation and operation of a ground mounted solar farm & associated infrastructure	Granted	11/08/2015	25	SolarFarm	20/11/2015	
RB2017/0910	Siting of 40MW battery storage park and associated external works	Granted	21/07/2017	10	BEES	19/06/2008	
RB2017/1132	Energy storage system comprising battery storage containers, ancillary structures and landscaping	Granted	24/07/2017	10	BEES	22/09/2017	
RB2017/1426	Small scale electricity battery storage facility consisting of 25 No. 2MW battery containers and 10 No. 2MW Inverters, plant & substation, 2.4m security fencing and external works	Granted	09/10/2017	10	BEES	15/01/2018	
RB2019/1343	Siting of a 50MW battery storage facility consisting of 22 battery containers, 24 inverters, 13 transformers, 3 T-boost stations, 2 back-up generators, customer substation, control room, 66kv switchgear equipment, welfare & storage containers and 2.4m se	Granted	28/08/2019	25	BEES	22/11/2019	
RB2020/0278	Installation of underground cables from substation to battery storage site	Granted	17/02/2020	10	BEES	01/04/2020	
RB2021/1211	Siting of containerised Battery Energy Storage System	Granted	14/06/2021	10	BEES	19/08/2021	
RB2022/0622	Construction of battery energy storage facility with associated landscaping and infrastructure works	Granted	20/04/2022	10	BEES	21/06/2022	
RB2022/1203	Installation and operation of a solar energy park and associated infrastructure	Granted	04/08/2022	25	SolarFarm	13/06/2023	
RB2022/1267	Battery energy storage with associated infrastructure and equipment	Granted	04/08/2022	10	BEES	28/09/2022	
RB2022/1767	Battery energy storage facility and associated works	Granted	25/11/2022	10	BEES	12/05/2023	
RB2023/0542	Erection of storage containers, support infrastructure along with free standing CCTV columns and security fence for battery energy storage facility	Granted	18/04/2023	10	BEES	20/06/2023	
RB2023/0762	Installation of battery storage unit & ancillary structures	Granted	05/06/2023	10	BEES	28/07/2023	
RB2023/1008	Installation of battery energy storage unit & ancillary electrical infrastructure	Granted	26/06/2023	10	BEES	18/08/2023	
RB2019/0105	Prior Notification for the installation of Solar Photovoltaics (PV) equipment	Granted	17/01/2019	10	SolarFarm	20/02/2019	
RB2023/1323	Erection of a battery energy storage facility including storage containers and other support infrastructure and equipment	Undetermined	27/09/2023	10	BEES		
RB2024/0063	Erection of 100mw battery storage facility and associated works	Refused	19/12/2023	25	BEES	29/11/2024	
RB2024/0321	Erection of 100mw battery storage facility, creation of bund and associated earthworks and other associated works, land off Moat Lane, Wickersley	Refused	23/02/2024	25	BEES	06/12/2024	
RB2024/1307	Erection of a battery energy storage facility including storage containers and other support infrastructure and equipment	Granted	09/09/2024	10	BEES	06/02/2025	
RB2024/0808	Installation of free standing solar panels on grassed area	Undetermined	05/11/2024	10	SolarFarm		
RB2025/0029	Proposed ground-mounted solar PV arrays, supporting energy infrastructure (including battery storage (BEES), access improvements and ancillary development including, landscaping and biodiversity enhancements and continued shared agricultural use	Undetermined	24/12/2024	25	SolarFarm		
RB2025/0168	Installation of solar roof panels, signage panels and alterations to shop frontages including amendments to glazing, windows and access doors along with new plant and bin enclosures	Granted	05/02/2025	10	SolarFarm	12/03/2025	
RB2024/0638	Installation of ground mounted solar panels for non-commercial use, including associated equipment, mounting frames, cabling, inverters and battery storage	Refused	03/07/2024	10	SolarFarm	28/08/2024	
RB2019/1680	Application to vary condition 02 (approved plans) (now condition 1); 03 & 04 (noise) (now 02 & 03) imposed by RB2018/0313 Land at Caxton Way Dinnington Rotherham.	Granted	01/01/1900	0	SolarFarm	03/10/2024	
RB2022/0853	Change of use of land for Installation of flexible electricity storage facility to supplement the local electricity grid in order to stabilise and secure electricity supply. Land south-west of West Melton Electricity Substation, Elsecar Road, Brampton Bi	Granted	01/01/1900	0	SolarFarm	13/09/2022	
RB2022/1236	Application to vary conditions 1 (Approved Plans), 8 (Drainage) & 9 (Trees) imposed by RB2020/1387 land adj West Melton Electricity substation, Elsecar Road, Brampton Bierlow	Granted	01/01/1900	0	SolarFarm	17/10/2022	
RB2025/0240	proposed Battery Energy Storage Scheme (BEES); land at, Hard Lane, Kiveton Park, Rotherham, S26 6RP	Undetermined	25/02/2025	0	BEES		
RB2025/0236	EIA Screening Assessment, Land at Firsby Lane, Hooton Roberts	Issued	20/02/2025	0	SolarFarm	11/03/2025	
RB2025/0358	EIA land off, Morthern Lane, Thurcroft - SAPAPP	Issued	13/03/2025	0	Solar Far	04/04/2025	

APPENDIX 2

Appendix 1

NB A more detailed description of these heritage assets as well as all the other candidates submitted for assessment can be found at the South Yorkshire Local Heritage List website: <https://local-heritage-list.org.uk/south-yorkshire>

Consultation Recommendations for Local Listing as of 6th April 2024 (Non-Council Owned Buildings)

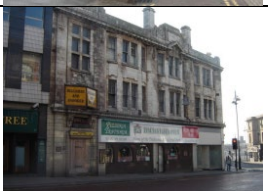
Heritage Asset Address	Photo	Asset Type	Asset Ref	Consultation Responses	Recommendation
Stag Inn 111 Wickersley Road Broom S60 4JN		Building/Structure	DSY4354	No objections received	Include on the Rotherham Local Heritage List
Former Temperance Hall 75 Wellgate Clifton S60 2LZ		Building/Structure	DSY4293	No objections received	Include on the Rotherham Local Heritage List
St Joseph's RC Church 1 Swinston Hill Road Dinnington S25 2RX		Building/Structure	DSY4457	Written Representation received from owner- No Objections	Include on the Rotherham Local Heritage List
St Leonard's Church Church Lane Dinnington S25 2LT		Building/Structure	DSY4456	No objections received	Include on the Rotherham Local Heritage List

The Older Rectory 14 Laughton Road Dinnington S25 2PP		Building/Structure	DSY4459	Verbal Representation received from owner- No Objections, however, requested correction of building description	Description amended. Include on the Rotherham Local Heritage List
The Old Rectory (Job Centre Plus) 4 Church Lane Dinnington S25 2LZ		Building/Structure	DSY4458	No objections received	Include on the Rotherham Local Heritage List
Throapham Farm House Oldcotes Road Dinnington S25 2QS		Building/Structure	DSY 4091	Verbal Representation received from owner- No Objections	Include on the Rotherham Local Heritage List
Former Fire & Ambulance Station (J. E. James Cycles) Erskine Road Eastwood S65 1RF		Building/Structure	DSY4360	Written Representation received from owner- No Objections	Include on the Rotherham Local Heritage List
Former St Ann's Board School Eastwood S65 1PF		Building/Structure	DSY4359	No objections received	Include on the Rotherham Local Heritage List
Black Lion Public House 9 New Road Firbeck S81 8JY		Building/Structure	DSY4482	No objections received	Include on the Rotherham Local Heritage List

Estate Lodge 19 New Road Firbeck S81 8JY		Building/Structure	DSY4488	Verbal Representation received from owner- No Objections	Include on the Rotherham Local Heritage List
31-37 New Road Firbeck S81 8JY		Building/Structure	DSY4483	No objections received	Include on the Rotherham Local Heritage List
Nether Haugh House 3 Nether Haugh The Whins, Greasbrough S62 7RZ		Building/Structure	DSY4504	Verbal Representation received from owner- No Objections	Include on the Rotherham Local Heritage List
21 Nether Haugh The Whins Greasbrough S62 7RZ		Building/Structure	DSY4474	No objections received	Include on the Rotherham Local Heritage List
Nether Haugh Farm 24 Nether Haugh The Whins, Greasbrough S62 7RZ		Building/Structure	DSY4476	Written representation from the owner (Wentworth Estates) No Objections	Include on the Rotherham Local Heritage List
Iron Age Enclosures (adjoining Loscar Common Plantations) Common Road, Harthill S26 7ZD		Archaeological Site	DSY4445	No objections received	Include on the Rotherham Local Heritage List

2-7 Street Lane Hoover S62 7SF		Building/Structure	DSY4497	Letter went out to all 7 owners. Verbal response from one property (No.4)-No objections	Include on the Rotherham Local Heritage List
Tommy Flockton's Field Hard Lane (adjacent to rail line) Kiveton Park S26 6RP		Archaeological Site	DSY4440	No objections received	Include on the Rotherham Local Heritage List
Former White Swan Hotel 7-9 Blyth Road, Maltby S66 8HX		Building/Structure	DSY4461	No objections received	Include on the Rotherham Local Heritage List
Former Wesleyan Methodist Chapel Blyth Road, Maltby S66 8JD		Building/Structure	DSY4464	No objections received	Include on the Rotherham Local Heritage List
The Queens Hotel Tickhill Road Maltby S66 7NQ		Building/Structure	DSY4462	No objections received	Include on the Rotherham Local Heritage List
Jamia Masjid Ahl-e-Hadith Mosque (former Unitarian church) Moorgate Street, Moorgate S60 2EY		Building/Structure	DSY4285	No objections received	Include on the Rotherham Local Heritage List

Royal Mail Post Box (adjacent to Moorgate Crofts Business Centre) Moorgate Street, Moorgate S60 2DH		Other site, structure or landscape	DSY4376	No objections received	Include on the Rotherham Local Heritage List
Sitwell House Coach House Lane Moorgate S60 3AT		Building/Structure	DSY4269	No objections received	Include on the Rotherham Local Heritage List
Sitwell House Lodge, gate piers and wall 173 Moorgate Road Moorgate S60 3AP		Building/Structure	DSY4479	No objections received	Include on the Rotherham Local Heritage List
7&9 Daniel Lane Nether Haugh S62 7RG		Building/Structure	DSY4473	Written representation from the owner (Wentworth Estates) No Objections	Include on the Rotherham Local Heritage List
Town Wells The Wells North Anston S25 4ED		Other site, structure or landscape	DSY4384	Verbal Representation from Clerk to Anston Parish Council. No Objections	Include on the Rotherham Local Heritage List
Rawmarsh Carnegie Library Rawmarsh Hill Parkgate S62 6DP		Building/Structure	DSY4286	No objections received	Include on the Rotherham Local Heritage List

Rawmarsh and Parkgate War Memorial (Junction of High Street / Church Street) Rawmarsh S62 6LR		Commemorative Monument/Memorial/ Statue	DSY4480	No objections received	Include on the Rotherham Local Heritage List
Alma Road Board School The Maltings 1 Maltkiln Street Rotherham Town Centre S60 2HY		Building/Structure	DSY4375	No objections received	Include on the Rotherham Local Heritage List
Cupola Works Masbrough Street Rotherham Town Centre S60 1ER		Building/Structure	DSY4288	No objections received	Include on the Rotherham Local Heritage List
Down's Row Old Chapel Down's Row Rotherham Town Centre S60 2HD		Building/Structure	DSY4290	No objections received	Include on the Rotherham Local Heritage List
Essoldo Chambers High Street Rotherham Town Centre S60 1PY		Building/Structure	DSY4279	No objections received	Include on the Rotherham Local Heritage List
Former Cross Keys Public House Moorgate Street Rotherham Town Centre S60 2DA		Building/Structure	DSY4282	No objections received	Include on the Rotherham Local Heritage List

Former Grammar School Building 11-13 Moorgate Road Rotherham Town Centre S60 2EN		Building/Structure	DSY4374	No objections received	Include on the Rotherham Local Heritage List
Former Maltings (The Malthouse) Masbrough Street Rotherham Town Centre S60 1EX		Building/Structure	DSY4277	No objections received	Include on the Rotherham Local Heritage List
Former Sheffield Union Bank 35 College Street Rotherham Town Centre S65 1AF		Building/Structure	DSY4271	No objections received	Include on the Rotherham Local Heritage List
Former Wellington Inn 52 Westgate Rotherham Town Centre S60 1AX		Building/Structure	DSY4315	No objections received	Include on the Rotherham Local Heritage List
Howard Building Howard Street Rotherham Town Centre S65 1AX		Building/Structure	DSY4280	No objections received	Include on the Rotherham Local Heritage List
Rotherham Cooperative Society Building 1-8 Westgate Rotherham Town Centre S60 1AN		Building/Structure	DSY4295	No objections received	Include on the Rotherham Local Heritage List

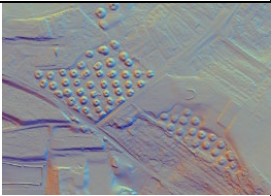
Rotherham Lock and Footbridge Forge Island Rotherham Town Centre S60 1RX		Landmark, art work or way finder	DSY4363	No objections received	Include on the Rotherham Local Heritage List
The Old Post Office 22 Main Street Rotherham Town Centre S60 1AJ		Building/Structure	DSY4281	No objections received	Include on the Rotherham Local Heritage List
Constables Cottage Church Street Swinton S64 8QA		Building/Structure	DSY4469	No objections received	Include on the Rotherham Local Heritage List
Former Don Pottery Workshop Rowms Lane Swinton S64 8AA		Building/Structure	DSY4466	No objections received	Include on the Rotherham Local Heritage List
Former Swinton Carnegie Library Carnegie House Station Street Swinton S64 8PU		Building/Structure	DSY4287	Verbal Representation received from owner- No Objections	Include on the Rotherham Local Heritage List
Swinton Bridge Workshops (former Swinton Bridge Board School) Rowms Lane, Swinton S64 8AE		Building/Structure	DSY4467	No objections received	Include on the Rotherham Local Heritage List

Sisters' Lych Gate (Entrance to Creighton Woods) Warren Vale, Swinton S64 8ER		Landmark, art work or way finder	DSY4465	No objections received	Include on the Rotherham Local Heritage List
Brinsworth Strip Mills Sheffield Road Templeborough S60 1BN		Building/Structure	DSY4381	No objections received	Include on the Rotherham Local Heritage List
Magna Centre Sheffield Road Templeborough S60 1DX		Building/Structure	DSY4380	No objections received	Include on the Rotherham Local Heritage List
Templeborough Roman Fort & Vicus Sheffield Road / Magna Way / Temple Close Templeborough		Archaeological Site	DSY4475	No objections received	Include on the Rotherham Local Heritage List
Marsh Street pumping station, Thornhill S50 1DF		Building/Structure	DSY4472	Written Representaions from the Owner. No Objections, required further clarification	Include on the Rotherham Local Heritage List
Thames House / Fitzwilliam House (Former Effingham Works) Thames Street Thornhill S60 1LU		Building/Structure	DSY4278	No objections received	Include on the Rotherham Local Heritage List

Saracens Head Public House 24 Church Street Wath upon Dearne S63 7QY		Building/Structure	DSY4509	No objections received	Include on the Rotherham Local Heritage List
The Wath Double Culverts Adjoining 51 West Street Wath upon Dearne S63 6PU		Building/Structure	DSY4508	No objections received	Include on the Rotherham Local Heritage List
Wath upon Dearne Moated Site West Street / Biscay Lane Wath upon Dearne S63 6PT		Archaeological site	DSY4307	No objections received	Include on the Rotherham Local Heritage List
Ivy Cottage 16 The Crofts Wellgate S60 2DJ		Building/Structure	DSY4283	No objections received	Include on the Rotherham Local Heritage List
Masonic Hall Wellgate Mount Wellgate S60 2LY		Building/Structure	DSY4292	No objections received	Include on the Rotherham Local Heritage List
29 Cortworth lane Wentworth S62 7SB		Building/Structure	DSY4477	No objections received	Include on the Rotherham Local Heritage List

Consultation Recommendations for Local Listing as of 6th April 2024 (Council-Owned Buildings)

Heritage Asset Address	Photo	Asset Type	Asset Ref	Consultation Responses	Recommendation
Beeversleigh Flats Clifton Lane Clifton S65 2AD		Building/Structure	DSY4356	No objections received	Include on the Rotherham Local Heritage List
Clifton Park Bandstand Clifton S65 2AA		Other site, structure or landscape	DSY4355	No objections received	Include on the Rotherham Local Heritage List
The former Chelmsford Mining and Technical Institute (Rother Valley College) Doe Quarry Lane Dinnington S25 2NF		Building/Structure	DSY4373	No objections received	Include on the Rotherham Local Heritage List
The Dinnington War Memorial Laughton Road Dinnington S25 2PT		Memorial	DSY4294	No objections received	Include on the Rotherham Local Heritage List

Bailey Bridge over the River Don, Eastwood S65 3SH		Building/Structure	DSY4358	No objections received	Include on the Rotherham Local Heritage List
Redscope Plantation Shaft Mounds off Hungerhill Road Kimberworth Park S61 3NP		Archaeological Site	DSY4268	No objections received	Include on the Rotherham Local Heritage List
Shaft Mounds in Bray Plantation Off Oaks Lane Kimberworth Park S61 2XT		Archaeological Site	DSY4263	No objections received	Include on the Rotherham Local Heritage List
Former Maltby Grammar School Braithwell Road Maltby S66 8AB		Building/Structure	DSY4463	No objections received	Include on the Rotherham Local Heritage List
Moorgate Cemetery Lodges, Gates & Walls 20-22 Boston Castle Grove Moorgate S60 2BA		Building/Structure	DSY4293	No objections received	Include on the Rotherham Local Heritage List
Moorgate Cemetery Chapel Boston Castle Grove Moorgate S60 2BA		Building/Structure	DSY4378	No objections received	Include on the Rotherham Local Heritage List

Former Miners Institute (Parkgate Youth Community Centre) Broad Street Parkgate S62 6DX		Building/Structure	DSY4481	No objections received	Include on the Rotherham Local Heritage List
Former Alma Tavern 27 Westgate Rotherham Town Centre S60 1BQ		Building/Structure	DSY4298	No objections received	Include on the Rotherham Local Heritage List
The Civic Theatre Catherine Street Rotherham Town Centre S65 1EB		Building/Structure	DSY4272	No objections received	Include on the Rotherham Local Heritage List
Stone Crest outside Rotherham Central Station Rotherham Town Centre S60 1QH		Landmark, art work or way finder	DSY4362	No objections received	Include on the Rotherham Local Heritage List

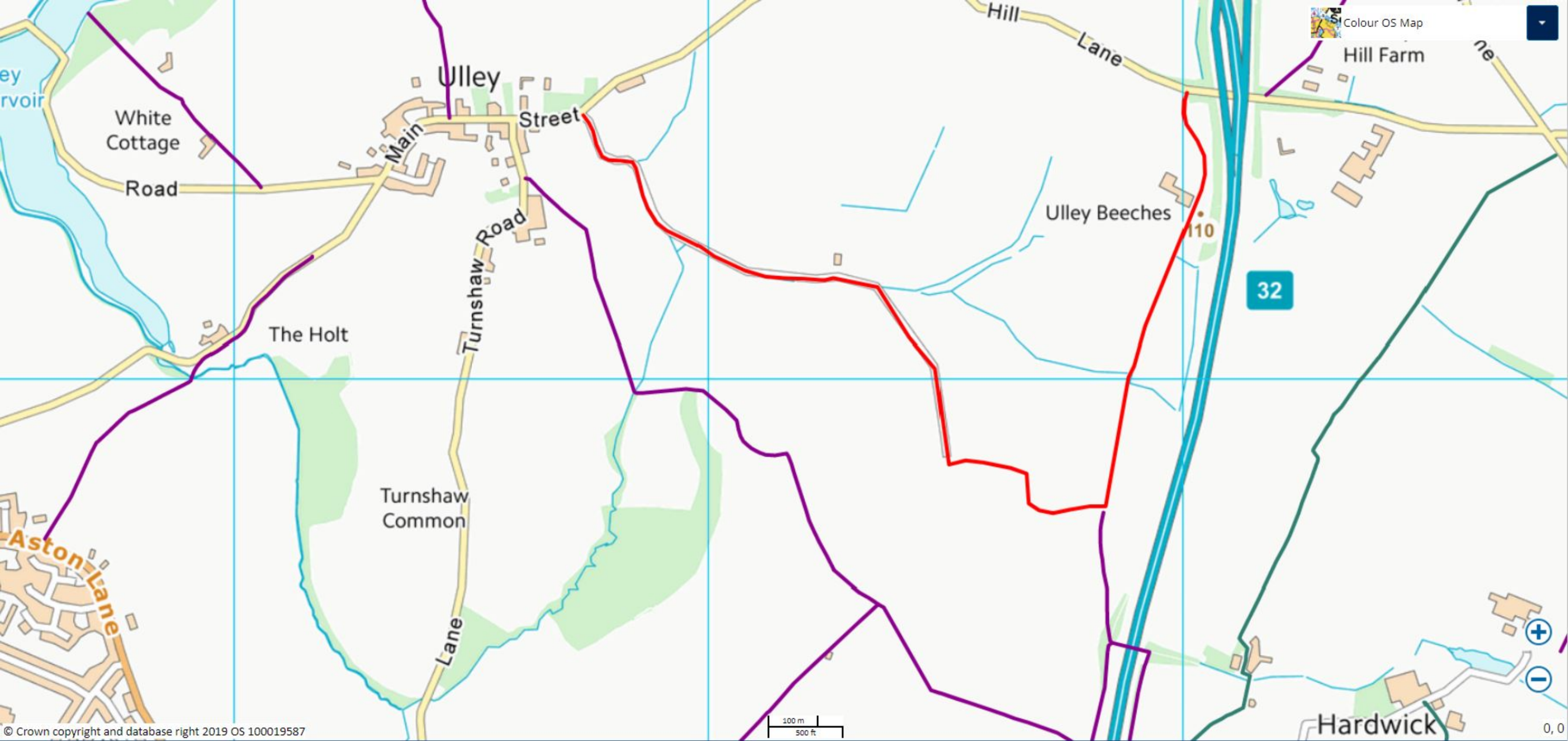
Heritage assets that are subject to further consideration of their heritage significance as of 6th April 2024

Heritage Asset Address	Photo	Asset Type	Asset Ref	Consultation Responses	Recommendation
Herringthorpe Hall Farm Cottages 252 Herringthorpe Valley Road, Herringthorpe S65 3AQ		Building/Structure	DSY4353	Written Objection from Owner	Write again to owner to further explain implications of Local Listing
Former Hard Mill (adjoining Fieldhouse) Hard Lane Kiveton Park S26 6RP		Archaeological Site	DSY4442	Written Objection from Owner	Ask for further heritage justification for objection and submit to assessment panel for review.
Quay Furniture (Wharf House / The Old Warehouse) Bridge Street Rotherham Town Centre S60 1QJ		Building/Structure	DSY4369	Written Objection from Owner	Ask for further heritage justification for objection and submit to assessment panel for review.
Sherwood House 35 Sherwood Crescent Wellgate S60 2NJ		Building/Structure	DSY4500	Written representation made from owner. Has concerns over potential restrictions	Negotiate further with a view to alleviating his concerns

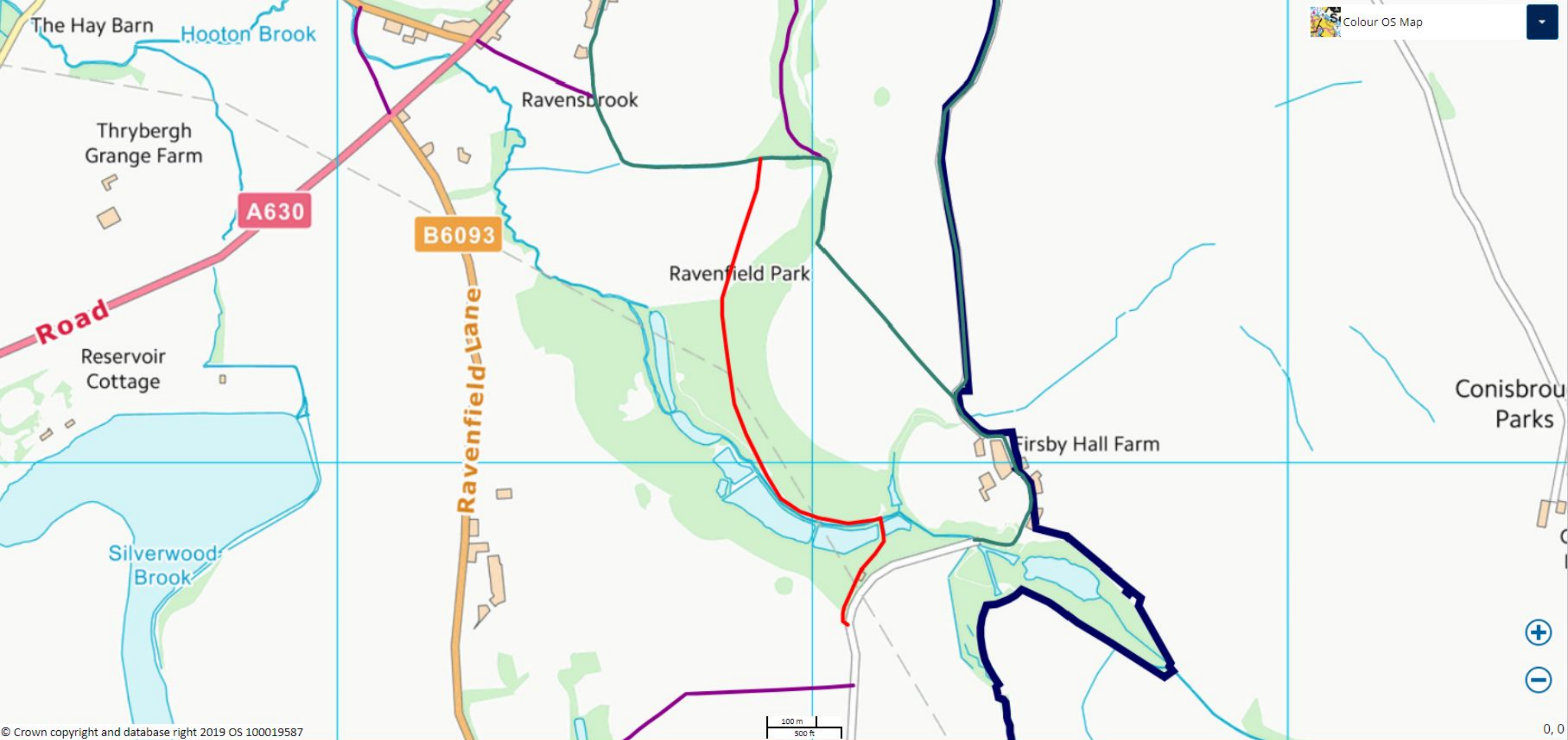
APPENDIX 3



APPENDIX 4



APPENDIX 5





Development Services, Howden House, 1 Union Street, Sheffield, S1 2SH
Telephone: (0114) 273 6428 / 6354 Fax: (0114) 273 5002
Email: syorks.archservice@sheffield.gov.uk

19th May 2025

Planning & Regeneration Service
Riverside House
Main Street
Rotherham
S60 1AE

FOR THE ATTENTION OF Lisa Brooks

Dear Lisa

**RB2025/0603 Environmental Statement (ES) and the scoping process for the
Whitestone Solar Farm**

The proposed development will impact archaeological remains within the site and may result in a significant impact.

Consideration of the effect of a development on cultural heritage is required as part of the EIA screening process under Schedule 3 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The site boundary encompasses a large area containing a diverse range of known heritage assets and environments in which there is a high potential for previously unrecorded heritage assets of archaeological interest to survive. The submitted EIA Scoping Report sets out a baseline assessment of this potential, identifying a moderate potential for early prehistoric remains and a high potential for Iron Age and Roman remains; and provides sufficient information to also indicate a high potential for medieval and post-medieval remains of archaeological interest. There is currently insufficient information to describe the significance of these potential remains or understand the scale of impact deriving from the proposals, and further archaeological work is required.

Development within the site boundary has the potential to impact upon any heritage assets of archaeological interest present, with the severity of the effect varying across the area dependant on the significance of the remains affected and the form of works proposed. The EIA Scoping Report identifies that direct impacts to heritage assets resulting in a significant impact are possible, and SYAS agree with the reports recommendation that is scoped into the EIA.

We welcome the proposed methodology to further field evaluation, which is based on a multi-staged and iterative approach. The developer is already in direct communication with SYAS and has provided initial results of a geophysical survey and requested advice on the

scope of further works. This work is essential to comply with planning policy and will enable an informed scheme to be developed that includes appropriate mitigation to avoid or minimise harm to heritage assets of archaeological interest.

In respect to the commitments register (Appendix C of the EIA Scoping Report), we recommend that Cultural Heritage and Archaeology should be included as a consideration in the Construction Environmental Management Plan and Decommissioning Environmental Management Plan in order that appropriate measures are put in place to protect heritage assets across the full lifespan of the scheme. This would also be appropriate for Operational Environmental Management Plan, which is noted as proposed in the report but absent for the commitments register.

For further information on these recommendations, please contact SYAS.

Yours sincerely,

James Thomson

Archaeologist



Sprotbrough and Cusworth Parish Council

Goldsmith Centre, 259 Sprotbrough Road,

Sprotbrough, Doncaster, DN5 8BP

T: (01302) 788093

E: clerk@sprotbroughandcusworthparishcouncil.gov.uk

W: www.sprotbroughandcusworthparishcouncil.gov.uk

Your reference – EN00110020

Doncaster Council

16th May 2025

Sent via email

Dear Sir/ Madam,

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) –
Regulations 10 and 11**

**Application by Whitestone Net Zero Ltd (the applicant) for an Order granting
Development Consent for the Whitestone Solar Farm (the proposed
development)**

Thank you for your letter of 24th April 2025 giving notification of the above scoping consultation. The Parish Council considered the matter at its meeting on 15th May 2025. The Parish Council recognises the importance of low carbon, renewable energy however it needs to be of an appropriate scale and in the right location which we believe this application is not. On this basis the Parish Council raises the following concerns over the proposal;

1. Loss of agricultural land. Given the size and scale of the proposal the loss of valuable agricultural land is significant. This land should be protected. This does not align with local and national agricultural planning policies. It will lead to industrialisation of the countryside and form part of a large band (alongside other solar farms) which will engulf much of the green belt on the north easter boundary of Doncaster.
2. Visual impact. The size of the proposal will mean it has a significant negative visual impact on the surrounding areas.
3. Impact on wildlife. The impact on the local wildlife and green spaces will be significant with loss of footpaths and local habitats.
4. Traffic and construction disruption. The impact on the local road networks will be significant with many HGV vehicles using the network during construction.
5. Energy efficiency. There are other more energy-efficient ways to generate electricity that would not require such a large footprint or loss of valuable countryside/ agricultural land.

6. The battery storage units required to store the electricity generated would be disproportionate development within the countryside and within this rural location.

Kind regards,

Emma Garner
Clerk to the Council

Stainton Parish Council

22nd May 2025

Dear Sir/Madam,

We write to you with regard to the following application:

EN0110020 - Whitestone Solar Farm - EIA Scoping and Consultation and Regulation 11 Notification.

Whilst Stainton Parish Council are not opposed to solar farms and does support renewable energy production, we have to write to you as a statutory body to support the many residents in surrounding areas of Clifton, Conisbrough, Hooton Roberts, Micklebring & Ravenfield who are deeply concerned about the Whitestone One proposal. Stainton Council & parish are not directly affected by this proposal but do recognise the following:

Biodiversity and Nature Conservation

The sprawl of this proposal some 439 hectares will significantly affect quality of life for residents directly and indirectly. We know from CDC Local Plan 2015 – 2035 that the openness and permanence of Doncaster Greenbelt will be retained. If this proposal is pushed forward then it goes against Policy 1, Policy 30, Policy 32 & Policy 33 of this plan. National decisions are only as good as local knowledge, a matter which Whitestone Net Zero Ltd has ignored in their local consultation.

Landscape and Visual Impact

Stainton village is a rural village and the Parish Council recognise that renewal energy is extremely important however this should not be at the loss of greenbelt and beautiful vistas. Other locations must be reviewed and reviewed again by an independent ombudsman before all of this land is taken from those who have enjoyed it for many generations.

Traffic and Transport

Stainton Village has been affected by development by quarries in the last twenty years. It is clear from the plans by Whitestone that little or no considerations have been made at this stage for the road infrastructure to be improved/enhanced in and around the affected areas.

Stainton Parish Council support the protection of our greenbelt in line with CDC's local plan.

Yours sincerely

Di Hoyes

Parish Clerk on Behalf of Stainton Parish Council



200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: Ms E Park – Senior EIA Advisor

The Planning Inspectorate

By Email: WhitestoneSolarfarm@planninginspectorate.gov.uk

Our ref: ENSIP11

22nd May 2025

Dear Ms Park

Re: Whitestone Solar Farm - For the construction, operation, maintenance, and decommissioning of the Whitestone Solar Farm; Situated Within South Yorkshire, Approximately 7 Km And 5 Km, To The East Of Sheffield And Rotherham

Thank you for your notification of the 24th April 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the area identified for the project there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety.

The submission is supported by an EIA Scoping Report, dated April 2025 and prepared by ERM. Chapter 10 of this report covers ground conditions and at paragraph 10.3.13 the report identifies that coal mining features are present and parts of the site are defined as

high risk. It is noted that unstable ground conditions are proposed to be scoped out of the EIA but that a Phase 1 Coal Mining Risk Assessment, and a possible Phase 2 if deemed necessary, will be prepared and submitted.

We have no objections to the Coal Mining Risk Assessment being a stand-alone document and not forming part of the ES itself.

Solar panels themselves fall on our published Exemptions List, we do however request that if mine entries are present consideration is given to retaining these areas devoid of solar panels and fenced, in the interests of public safety. The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

Where infrastructure is proposed to support the solar farm we would again seek to ensure that this is not built over, or within influencing distance of, the recorded mine entries. Where this cannot be avoided justification for this should be provided along with a robust engineering solution for addressing the risks posed. It would be helpful for any future report to include a plan which clearly demonstrates the relationship between the solar farm layout, including ancillary equipment/buildings, and the coal mining features present, specifically mine entries and their zones of influence.

I hope this is helpful but please do not hesitate to contact me should you wish to discuss this further.

Yours sincerely

Melanie Lindsley

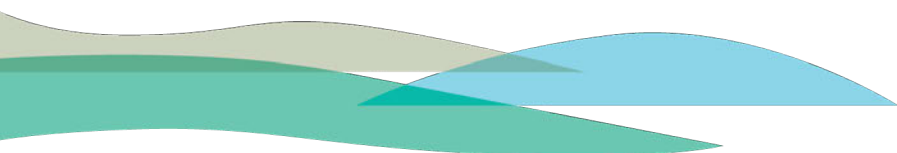
Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI

Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority by the Local Planning Authority and/or information that has been published on the Council's website for consultation purposed in

relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the applicant for consultation purposes.



From: [Terry Craven](#)
To: [Whitestone Solar](#)
Subject: Application by Whitestone Net Zero Ltd (the applicant) for an Order granting Development Consent for the Whitestone Solar Farm (the proposed development)
Date: 22 May 2025 16:24:45

Good Afternoon, with reference to the 'Scoping Opinion' for the solar farm planned development in our area.

We at Thrybergh Parish Council in Rotherham have examined the documentation re Scope and would make the following comments:-

Public right of way closures- how will alternative routes be provided? This should not be scoped out of the EIS

The decommissioning stages should not be scoped out of the EIS as it is very subjective to say they will be similar to construction

Socio economics land use - it is incorrect to State this has no impact on tourism. Walkers will be excluded from the wider area due to the visual and noise effects of both construction and operation.

Glint and glare should not be scoped out of commissioning and decommissioning as the handling of the panels will create this issue.

Major accidents and disaster should not be scoped out due to the proximity of the development to housing.

We hope you take on-board our comments.

Regards

Terry Craven

Clerk to Thrybergh Parish Council

To Whom it May Concern

Environmental Impact Assessment Scoping Report

Response from Treeton Parish Council

We are in receipt of the EIA Scoping Report prepared by Environmental Resources Management on behalf of Whitestone Net Zero Limited for the construction, operation, maintenance and decommissioning of the proposed Whitestone Solar Farm. The one report covers Whitestone 1,2 and 3 and its size is such that it is difficult to identify the relevant information relating to each of these components. In our view it would be preferable to have separate reports for the three proposed farms.

The Parish Council (PC) notes that following the first round of consultation, Whitestone has advised that around a quarter of the land which was identified in the original development plan has been removed in order to address local concerns and to mitigate the solar farm's impact. The revised Whitestone Solar Farm will however still subsume a staggering 3,400 acres of agricultural land of which over a half, 1816 acres, will be in Whitestone 2 where Treeton is situated.

This entire development takes away thousands of acres of food producing agricultural land, compromising food security and self-reliance at a time when the demand for food is rapidly increasing.

It is disappointing to note that Whitestone has chosen not to remove any land around Treeton to mitigate the impact of the development and has also failed completely to recognise or give any consideration to the huge impact the National Grid's proposed Electricity Sub Station will have on the village. Whilst this is separate development, and falls within the Parish of Whiston, it is on the immediate border with Treeton and these two developments, if approved, will sit side by side.

The construction of the proposed Sub Station forms part of the Government's green energy strategy to facilitate the transport of green energy to other parts of the country and it therefore appears inconceivable that Whitestone has chosen to disregard such a significant development in such close proximity to its solar farm. There is not a single reference to the substation under the section describing the W2 site and barely a mention of Treeton.

The substation will be of a size equivalent to eleven football pitches and also constructed on what is currently agricultural land. Both developments will require access via Long Lane, off the A631 as the access point from Treeton is too narrow to accommodate lorries. This is a narrow and dangerous road which is unsuitable for heavy vehicles and in a very poor state of repair to the north. There are frequent accidents and damage to vehicles which go mostly unreported to the police.

It should also be noted that the Ulley cross roads at Aughton is difficult to navigate and there can be huge tail backs of traffic at peak times of the day and when the motorway is closed which can cause delays, sometimes in excess of half an hour when exiting Treeton.

The effect of both developments will have a detrimental impact on Treeton during construction, compromising highway safety, and in the longer term will have an unacceptable adverse effect on the character and appearance of the landscape and the surrounding area.

Two major developments taking place on Treeton's doorstep simultaneously would be intolerable and morally wrong to impose on residents.

In the first round of consultation Whitestone did not offer a public meeting with the residents of Treeton, we would like to request that in any further consultation an open meeting takes place at which residents can put forward their concerns and learn how they might be addressed.

Treeton is one of the oldest Parish's in the country and is mentioned in the Domesday Book but its recent history since the late 1800's has been one of coal mining which resulted in the heavy scarring of the landscape with two large coal waste tips, railways and a large landfill which were all in use until the 1990s. Also, after World War II the land around Spa House and Farm was subject to open cast mining. In the main all these former areas have been left to nature. It is more than disappointing that after over a hundred years of industrial activity, and as the village and its landscape is beginning to recover, along comes this proposal to disfigure the village's surroundings yet again.

With regard to the wildlife habitat, in the areas to be used for the solar panels, the field margins managed for game birds support a large population of birds through the winter including Tree Sparrows, Chaffinches, Linnets, Goldfinches, Reed Buntings and Yellowhammers. Difficult access to the areas makes recording a challenge, but records have been submitted to the Rotherham Biological Records Centre by our Parish Councillor, Robert Croxton, who has advised that surveys through the breeding season will not highlight this habitat. It is of note that these areas also have a good population of Brown Hares.

We are sceptical of the advice provided by so called 'experts/consultants' used by developers who so often have no personal knowledge of the habitat and we would ask that Whitestone work with local naturalists with regard to nature conservation. Councillor Robert Croxton has been involved in nature conservation for 40 years and his knowledge of the local habitat in Treeton and the surrounding area is probably second to none. His experience is that developers are keen to engage such consultants at the planning phase of developments, but in the long term adopt a 'we know best' attitude to mitigation work. We would recommend that advice is sought from people who have meaningful local knowledge.

The Whitestone development, if approved, will be the biggest solar farm ever seen in this country to date, dwarfing others, and will see vast swathes of green belt land given over to solar panels which will have an overwhelming impact on a recovering landscape after years of heavy industrial activity. The PC's view is that there has been a failure to evaluate the overall and collective visual impact that the footprint of this development will have on the environment and who for many people will be a permanent feature during their life time.

The EIA Scoping Report comprises hundreds of pages and covers a plethora of issues but it should not be an instrument to provide legitimacy to this proposed development which we believe is too big and will have an overbearing impact on the landscape, resulting in the loss of habitat, much needed agricultural land and will potentially impact the wellbeing of residents.

Foot Note – We note that this report is restricted to environmental impact but the Parish Council has serious concern about the cost benefit analysis elements of this development and the impact on energy prices.

Submitted by Treeton Parish Council



UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
NOTTINGHAM
NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0110020
Our Ref: CIRIS 92486

Ms Emily Park
Senior EIA Advisor (PIEMA)
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol BS1 6PN

16th May 2025

Dear Ms Park

Nationally Significant Infrastructure Project Whitestone Solar Farm - PINS Reference: EN0110020 Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise

or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

We recognise the promoter's proposal to include a health section. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

¹
<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>



Mrs Sarah Whitaker
Parish Clerk & Responsible Financial Officer
Ulley Parish Council
C/o Ulley Village Hall
Main Street
Ulley
S26 3YD

Whitestone Solar Farm
Freepost
SEC NEWGATE UK LOCAL

22nd January 2025

Re: Whitestone Solar Farm

We write to make clear our total opposition to the scale and size of the proposed Whitestone 2 Solar farm which will engulf this small village.

Ulley is a small rural village (80 households), much of which is a conservation area and with five listed buildings. Listed in the Domesday book, the village is surrounded by fields, all of which are farmed for food crops. It is a popular recreation area for walking, horse-riding and cyclists, being positioned between the mining towns of Treeton, Thurcroft and Dinnington. It is therefore an important green space not only for residents but for a significant wider population.

The current proposal is unacceptable to residents. We seek reassurances on the following:

The size of the proposed site is reduced to maintain the rural nature of the village. We would expect the boundaries of the site to be well removed from the village boundary and set back substantially from the roads leading into the village.

We seek reassurances that there will be no battery storage within the Parish boundaries, and no cable runs that will impact on the conservation area.

We object strongly to the use of agricultural land for this project. Whilst landowners might profit, the majority of our fields are farmed by tenant farmers who will not. Food security is a developing concern in this country, we cannot understand why agricultural land should be used to provide solar energy when there are so many other options.

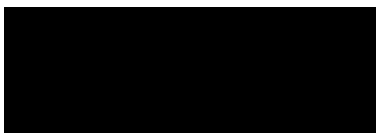
We enjoy a wide wildlife and bird population and have a significant number of nesting Buzzards, Falcons, Owls etc that need large hunting grounds to thrive, as well as deer that need space to roam. It is of vital importance that the proposed project takes account of these needs and is reduced in size to provide wide hunting/roaming spaces.



We have a good network of well used public footpaths, bridal ways and Green lanes, all of which are within the boundaries of the proposed solar farm. These rights of way must be protected and boundaries of the site moved away from them sufficiently to allow users to be able to still enjoy the wide views across to Rotherham, Sheffield and Derbyshire.

The size and scale of this proposal needs to be considered and planned alongside any other solar developments that are already in place or going through the planning process, the Piper Farm development and Common Farm Solar Park being the closest to the Village.

Yours sincerely,



Sarah Whitaker
Parish Clerk & Responsible Financial Officer
Ulley Parish Council

clerk.ulleypc@outlook.com

Reply 19th May 2025

The Council have taken public opinion into the proposed development into consideration, generally the parishioners largely are against the use of greenbelt for the development. Local media accounts show the strength of local feeling against this, and many parishioners have written to local MP Jake Richards about this. The acceptance of the proposals will have an impact long term on the area. We are a previous coal mining area, over the last twenty years a great deal of money has been invested in the area to bring back wildlife and to provide an area which people can use for recreation and sport. This proposal will be a step backward if accepted. Whilst the council is supportive of the transition towards sustainable and renewable energy sources, use of green belt land is not appropriate. The long-term environment and community impact must be considered at this stage.

The council have concerns about the future of such huge sites, without a solid and binding decommissioning plan in place, the council members feel the ratepayer may end up covering the cost. In our opinion there also needs to be binding plans in place for the land to be returned to agricultural grade land after the period of usage is completed. Research has been done regarding the deterioration of land after solar farm usage, and it would suggest to us that the land would deteriorate and not be suitable for agricultural use. Any binding contracts regarding the decommissioning and repair to land would need to be transferrable as it is apparent that some net zero companies are selling the farms off after purchase. Responsible cradle to grave planning that accounts for land use, aesthetic impacts and lifecycle costs is a must. The Council are aware of several brownfield and previous industrial sites within 10 miles of the proposed development which are being ignored. For example, Silverwood near Thybergh is an unused brownfield area with sub station nearby. It would make more sense to use these areas first before using greenbelt.

The Council would like evidence that this development will bring long term benefits to the area. Good agricultural land will be lost. The National Planning Policy Framework expects local authorities to protect and enhance valued landscapes and areas of natural biodiversity and recognise the character and beauty of the countryside and the benefits of versatile farmland in their policies and decisions, we hope this will not be overlooked by the Planning Inspectorate. The placing of solar farms should be limited to brownfield and poorer quality unproductive land.

The UK has pronounced seasonal differences; solar farms produce most of their energy in the summer months when demand for electricity is lowest. Electricity cannot be stored without more BESS units being built. BESS units have their own problems which could reverse any net zero gains from solar panels. Already there have been numerous fires in the UK burning uncontrollably because of the nature of the lithium-ion batteries used.

In our area we now have wildlife using the planned areas, transitory animals will have their traditional routes lost, deer have already been moved on in Kiveton when the latest housing development was agreed. Bat and bird deaths are common as the creatures mistake the panels for water.

The company must in our opinion provide evidence when procuring the solar panels for installation that they are not provided by cheap labour in other countries, the act of making the

panels abroad because it is cheaper than to produce them in the UK and shipping them to the UK raises concerns about the ethics of the companies. We would like the inspectorate to include a clause that the panels be produced in the UK. Shipping from abroad negates any net zero claims.

Having examined the environmental report from Whitestone there are issues of concern. Kiveton Waters and Kiveton woodland areas are not marked on the plans as a local nature reserve. Upon reading the report about cabling corridors it would appear some cabling goes directly through what is known locally as Tommy Flocktons field. There are already overhead lines in that area. Whitestone have replied to an enquiry about the cabling corridors stating that the company will have search corridors which will connect to the substation at Brinsworth, these will be underground cables with nothing visible above ground and farming can continue above them. This shows lack of local knowledge and investigation. Tommy Flocktons field has an ancient barrow and also has Norwood tunnel underneath it; this is a canal tunnel leading to Killamarsh. The Canal society are renovating the canal and Norwood Tunnel is on their planned work.

From: deputyclerk@wickersleyparishcouncil.gov.uk
To: [REDACTED]
Subject: FW: EN0110020 - Whitestone Solar Farm - EIA Scoping and Consultation and Regulation 11 Notification
Date: 15 May 2025 16:21:33
Attachments: [img-0.png](#)
[img-1.png](#)
[image001.png](#)
[Letter to stat cons_Scoping & Reg 11 Notification_NEW.pdf](#)

You don't often get email from deputyclerk@wickersleyparishcouncil.gov.uk. [Learn why this is important](#)

Good afternoon,

Wickersley Parish Council have examined the scoping report submitted in relation to the proposed Whitestone Solar Farm, and are satisfied that the report covers all relevant matters.

Please could you confirm receipt of this email for our records?

Kind Regards,

Amy Naylor
Acting Parish Clerk

Wickersley Parish Council
Wickersley Community Centre & Library
286 Bawtry Road
Wickersley
Rotherham
S66 1JJ

Tel +44(0)1709 703270
www.wickersleyparishcouncil.gov.uk

