

Whitestone Solar Farm – EN0110020

Whitestone Net Zero Limited

Section 51 Advice Log

Version: 27 February 2026

There is a statutory duty under [section 51 \(s51\) of the Planning Act 2008](#) for the Planning Inspectorate to record the advice that it gives in relation to an application or potential application, and to make this publicly available.

This document comprises a record of the advice that has been provided by the Inspectorate to the applicant (Whitestone Net Zero Limited) and their consultants during the pre-application stage. It will be updated by the Inspectorate after every interaction with the applicant during which s51 has been provided. The applicant will always be given the opportunity to comment on the Inspectorate's draft record of advice before it is published.

The applicant will use this Advice Log as the basis for demonstrating regard to section 51 advice within the application.

Project name s51 Advice Log - Index	
Date of meeting	Meeting overview
13 February 2025	Inception Meeting
13 August 2025	<ul style="list-style-type: none"> • Programme Document Update • Response to scoping opinion • SoCC Update and Upcoming Statutory Consultation • Whitestone draft Masterplan • EIA Update
28 October 2025	<ul style="list-style-type: none"> • Email – Pre- application prospectus
26 November 2025	<ul style="list-style-type: none"> • Progress Update • Consultation Update • Environmental Assessment • Any other Business
13 February 2026	<ul style="list-style-type: none"> • Email – Land and Rights Negotiation Tracker
27 February 2026	<ul style="list-style-type: none"> • Programme Document Update • Local Authority Engagement • Adequacy of Consultation Milestone • Impact of AI in Examination • Design Updates • Targeted Consultation • Grid Connection Updates • Land and Rights Update

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Topic	Meeting date: 13 August 2025
Programme Updates	<p>The applicant provided an update on its project and confirmed the Statement of Community Consultation (SoCC) is currently with the Local Planning Authorities for consultation and it would be published in early September 2025, with statutory consultation due to take place between September and October 2025. The applicant confirmed they plan to submit their Development Consent Order (DCO) application in May 2026.</p> <p>The applicant enquired how the Inspectorate recommends they make best use of the standard level tier of its pre-application service. The Inspectorate advised the applicant to, where possible, provide questions seeking specific advice in advance of project update meetings thus enabling it to provide considered advice.</p>
Adequacy of Consultation Milestone (AoCM)	<p>The Inspectorate advised the applicant to inform it, at the earliest opportunity, of any changes to their project timetable that may affect the submission of the AoCM statement. The Inspectorate referred the applicant to the pre-application prospectus for guidance on timetabling the submission of the AoCM – typically received at least three months before application submission, and with sufficient time to consider s51 advice. The Inspectorate advised that the AoCM statement is checked against the expected content as set out in the government’s pre-application stage guidance.</p>
Draft Documents	<p>The Inspectorate enquired when the applicant intended to submit its draft documents for review as their current Programme Document did not include this in the project timeline. The Inspectorate advised that its review period was normally six weeks, and that it was common practice for applicants to submit all the documents they wish to be reviewed – under the standard tier of service as per the prospectus - at the start of the review period. The Inspectorate welcomed the applicant to arrange a project update meeting to discuss the draft document feedback, if it deemed it useful, once they had considered the advice received.</p>
Scoping Opinion	<p>The applicant informed the Inspectorate it had reviewed the Inspectorate’s scoping opinion and explained where it they were seeking to provide justifications for different approaches as compared with the opinion. The Inspectorate explained that the scoping opinion is based on the information provided within the scoping report. The Inspectorate advised the applicant to provide any further appropriate justification for</p>

	<p>their approaches in the Environmental Statement, along with any consultation activities undertaken, and any agreements reached with relevant bodies on the applicant's proposed methodologies and assessment outputs.</p> <p>In relation to Agricultural Land Classification (ALC) surveys for the cable route corridor, the Inspectorate advised the applicant to support its approach with appropriate evidence and agreement with relevant statutory bodies such as Natural England. Justification should be set out in the Environmental Statement, which should apply a reasonable worst-case scenario for the assessment of areas subject to flexible options under the Rochdale Envelope, such as the assessment of the cable route and location of the new National Grid substation.</p> <p>The Applicant may wish to review the recent Secretary of State decision on Oaklands Solar Farm Park (dated 19 June 2025) and the accompanying Examining Authority's Recommendation Report on the extent of ALC surveying of the projects cable route (at paras 4.57 to 4.61). The Examining Authority's Report summarised why further survey work of the cable route was requested during the examination. It also conveyed the agreement reached between the Applicant and statutory bodies to achieve an accurate baseline and demonstrate the likely potential impacts and effects (see paras 3.3.64 to 3.3.71). The Inspectorate noted that each application is considered on its own merits and that the circumstances in Oaklands and the Best and Most Versatile (BMV) land mix for Whitestone may differ, but the decision is nonetheless shared for interest.</p>
<p>Cable Corridor and new National Grid substation</p>	<p>The Applicant informed the Inspectorate that it had narrowed the cable route corridor from a range of 200 metres to 100 metres width since scoping, and this was likely to be reduced following further surveys. Therefore, the Inspectorate queried whether there was likely to be optionality in relation to the cable corridor route at submission. The Applicant confirmed that some optionality may still be present at this time.</p> <p>The Inspectorate advised the Applicant to ensure that appropriate detail is provided at statutory consultation stage about its optionality as well as the likely location of National Grid's new substation, to ensure parties can provide informed responses under the Gunning Principles. The Applicant may also need to consider undertaking further, targeted consultation if its Order Limits change. The Applicant was prepared on this issue and has been holding discussions with National Grid about the siting zone of the substation in relation to its Order Limits.</p>

Glint and Glare	The Inspectorate asked if more information could be shared at the next project update meeting regarding the Applicant's glint and glare assessments, given the proximity of the scheme to nearby motorways and residential settlements.
Statutory Undertakers	The Inspectorate respectfully reminded the applicant of the need to draft protected provisions and discuss these with relevant statutory undertakers during the pre-application stage to assist an efficient examination. An update on its discussions with Network Rail would be welcome given the potential for the scheme to cross a nearby railway line. The Inspectorate also requested the applicant to advise them if any Crown Land or special category land is affected by the proposed development.
Approach to examinations	The Inspectorate advised that it is seeking to achieve more proportionate examinations and shorter pre-examination stages, particularly for Solar schemes, following the previous government's 'Nationally Significant Infrastructure: Action plan for reforms to the planning process' (February 2023) and the current government's measures. The Inspectorate referenced the examination timetables for Oaklands Solar and Peartree Hill Solar as examples.
Programme Document (post-meeting advice)	<p>The Inspectorate has reviewed the applicant's latest Programme Document (August 2025 version), which has been produced having regard to the government's guidance on the pre-application stage and the expected content of Programme Documents as set out at paragraph 10. It is considered that the Programme Document provides a good description of the proposed development, timetable of pre-application activities, and the applicant's approach to stakeholder engagement.</p> <p>However, the Inspectorate referred the applicant to its previous advice on the Programme Document illustrated in its inception meeting note. It advised the applicant to provide an outline of the 'risks' identified at this stage in addition to how those risks will be managed (see paragraph 10 of the government's guidance). The Inspectorate also conveyed that it would be helpful if the Programme Document included an estimate of the generating capacity of the proposed development, indicated if an Issues Tracker will be used (and submitted with a Potential Main Issues for Examination document with the DCO application), and whether the Programme Document has or will be shared with relevant statutory bodies for their views on the proposed programme.</p> <p>The applicant should also include within its 'Table 2.1 Whitestone Solar Farm Key Pre-application Activity Dates', milestones for any likely project update meetings with the</p>

	<p>Inspectorate, the draft document review stage, the Adequacy of Consultation Milestone statement stage, and dates for any multiparty meetings or the evidence plans process if these are being pursued by the applicant.</p> <p>The Inspectorate noted the main issues table setting out the applicant’s view of the issues for resolution and the activities it will undertake to address those. It advised that this table should be kept regularly under review and updated as the application progresses through the pre-application stage. It should contain appropriate detail on the progress made against identified issues and any agreements reached with relevant statutory bodies on its proposed methodologies and assessment outputs. This information will help keep the Inspectorate, statutory parties, and members of the public informed.</p> <p>The Inspectorate enquired about the Applicant’s approach to HRA. The applicant advised that NE has verbally agreed to scope it out. The Applicant would submit a HRA briefing statement and NE would respond in writing with its advice and agreement.</p> <p>The Inspectorate also requested the Applicant to provide its methodology for assessment of Cumulative Effects in the draft ES and drew the applicant’s attention to the Gate Burton DCO application where concerns were raised regarding the assessment of Cumulative Effects.</p> <p>The Inspectorate also stated that it would be helpful if the Programme Document indicated whether any non-DCO licences or consents are needed, as well as whether the applicant intends to submit a Design Approach Document and Policy Compliance Document with its DCO application.</p>
Topic	Advice (Email): 28 October 2025
Pre-application Prospectus	<p>The Inspectorate has advised that, following a six-month review, the Pre-application Prospectus has been updated. Applicants with live projects at the pre-application stage should familiarise themselves with the revised document and consider any implications for their engagement with the Inspectorate.</p> <p>Key updates include:</p> <ul style="list-style-type: none"> • The establishment of land and rights negotiations tracking as a core service feature. All applicants are now expected to develop and share a tracker using one of two standard templates, regardless of service tier.

	<ul style="list-style-type: none"> Clarified expectations for applicants ahead of meetings with the Inspectorate. This includes confirmation that the Inspectorate may delay or refuse service where pre-meeting requirements, such as the timely submission of an updated programme or issues tracker, are not met.
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Topic	Meeting date: 26 November 2025
Progress Update	<p>The applicant gave an update on the status of the programme document, confirmed their updated programme document is on their project website, and that they intend to submit their application in May 2026.</p> <p>The Inspectorate has reviewed the applicant's updated Programme Document (November 2025 version) and notes that it continues to provide the expected content as set out in the government's guidance on the pre-application stage. However, the Inspectorate further advises that it should contain an outline of the 'risks' identified at this stage in addition to how those risks will be managed (see paragraph 10 of the government's guidance). The applicant is also asked to include high level commentary on any agreements reached with relevant statutory parties on its methodologies and approaches to assessments or mitigation, in further iterations (especially in the absence of an Issues Tracker). This will help the Inspectorate to understand the readiness of the application before submission.</p>
Consultation Update	<p>The applicant provided an update on its statutory consultation stage (from 16 September to 28 October 2025). The applicant was carrying out its assessment of feedback to inform any design changes / application refinements accordingly.</p> <p>The applicant also reported that it had received limited feedback from the City of Doncaster and Rotherham Borough Council to date, owing to some resource constraints. The applicant explained that PPAs had been agreed, but that the councils had yet to procure specialists for most topics. The applicant also explained that it had received no feedback from Derbyshire County Council Northeast Derbyshire District Council (potentially owing to only a small part of the access track falling within their administrative boundaries). The applicant was encouraged by the Inspectorate to seek agreement with these</p>

	<p>authorities to confirm that they do not wish to comment at pre-application or engage in the examination (specifying any reasons and to confirm that they will not be discharging authorities for any post-DCO consents).</p> <p>The applicant has confirmed that, following the Project Update Meeting, a written response to the Statutory Consultation was received from Northeast Derbyshire District Council.</p> <p>In answer to a previous request from the Inspectorate, the applicant said it had received feedback from seven statutory undertakers and that their consultation responses are being considered as part of any redesign assessment as well as the drafting of protective provisions. Discussions had been held with Network Rail in relation to potential crossing of (or buffers required to protect) the nearby railway line. The applicant also confirmed there is no Crown Land involved.</p> <p>In answer to a question from the Inspectorate, the applicant said that no specific feedback had been received at this stage from Historic England, other than through Council submissions in relation to potential historic assets effects. The applicant later in the meeting clarified they have received a response from Historic England, and it was sent to the wrong inbox, and that further engagement with Historic England and South Yorkshire Archaeology Service is underway.</p>
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<p>Environmental Issues</p>	<p>The applicant stated it had evaluated glint and glare using ForgeSolar modelling and identified nine road and rail receptors at risk of potential glint and glare effects. The applicant said they will conduct further analysis to validate and determine the significance of potential effects in those locations. Any significant effects should be reduced through design and mitigation measures (such as planting hedgerows), the applicant added.</p> <p>In answer to questions from the Inspectorate, the applicant stated that its glint and glare assessments would likely sit in the 'other relevant environmental topic' chapter, and that intra and inter cumulative effects would be captured in relevant assessments, but that it was still considering options.</p> <p>The Inspectorate advised that, in relation to the Landscape and Visual Assessment, the applicant submits as many site sections and photos taken at different times of the year as necessary, to show the changes in seasonality as well as ensuring night and daytime perspectives are captured. The Inspectorate referred to recent section 51 advice issued following the acceptance letter of the East Midlands Gateway 2 application.</p> <p>The Inspectorate asked the applicant to clarify whether it had identified any other DCO developments in the area (asking whether the Helios Renewable Energy Project was near to northern edge of the Order Limits). The applicant said that it would continue to develop its long and short lists of developments in the area in consultation with the LPAs in view of the Inspectorate's published advice, but that currently no other NSIPs appeared in its zone of influence at this stage and that the Councils had not reported such developments.</p> <p>In respect of the Cable Route Corridor, the applicant was still seeking flexibility with its cable route options at this stage, with assessment / operating widths shown at statutory consultation at 260 to 300m, and a working width of 75m. The Inspectorate referred to recent s51 draft document review advice which advised an applicant to justify the degree of flexibility in the cable corridor widths in its DCO. The applicant explained that the 300m would be refined and finalised at the DCO application stage and they would only submit the width needed for the Project.</p> <p>The applicant reported that it is undertaking its surveys of the preferred cable corridor identified after statutory consultation. It is not proposing to survey reptiles and birds (breeding and wintering birds) owing to temporary impacts and reasonable avoidance measures proposed. Some</p>
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surveys may be taken out of season too and the applicant was not going to undertake Agricultural Land Classification (ALC) surveys of the cable corridor options. The Inspectorate advised to obtain agreements with relevant statutory parties on these proposed approaches and to include appropriate justification on its approach in the Environmental Assessment, to avoid issues at examination and potential delays in the DCO process. Following a query from the Inspectorate, the applicant confirmed that Natural England agreed that there is no functionally linked land along the preferred cable corridor. The applicant also said it had engaged with Natural England on their approach to ALC surveys for the solar array areas / desk-based data to inform the ES assessment. ALC Surveys are being conducted across the solar areas. The Applicant also confirmed that cable route ALC surveys are not proposed due to the temporary nature of works along the cable corridor, which is also an approach consistent with other DCOs. The Applicant also confirmed that all impacts will be minimised during the construction phase through adherence to an Outline Soil Management Plan that will be submitted with the DCO, which will contain mitigation measures.

The Inspectorate advised that any evidence of agreement on the approach to determining baseline conditions should be provided in the application.

AOB	<p>The applicant requested that the date for the submission of draft documents to The Planning Inspectorate for review be amended to reflect a submission in the week commencing 26 January 2026. The applicant highlighted they are aware of the six-week review period and suggested booking a project update meeting in March 2026.</p> <p>The Inspectorate advised to submit as complete drafts of documents as possible, including the DCO, to enable the Inspectorate to provide more comprehensive advice. The applicant should also set out in advance any requests for specific advice it is seeking as part of the review process.</p>
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Topic	Advice (email): 13 February 2026
Land and Rights Negotiation Tracker	<p>We note your decision not to provide us with a land and rights negotiation tracker before the submission of the application, which is your choice.</p> <p>While the tracker is not a statutory requirement, the Inspectorate continues to encourage applicants to provide us with the information outlined under the 'primary service features' in the Inspectorate's 2024 Pre-application Prospectus during the pre-application stage.</p> <p>The Land and Rights negotiation tracker is intended to provide a high-level summary of information on the general status of land required for the proposed development and the progress made to date with any voluntary agreements or significant issues arising in respect of potential compulsory acquisition matters. This information is designed to help the interactions between the applicant and the Inspectorate during the pre-application stage and the production of any s51 advice needed to identify and address any risks. Without this information, the Inspectorate is unlikely to be able to reach an informed view on the preparedness of the application in relation to land rights before submission.</p> <p>It is our experience that unresolved land and rights issues can complicate and extend the duration of post-submission stages and add to the volume / complexity of Examining Authority questions and potential Compulsory Acquisition Hearings (should an application be accepted for examination). These are risks that an applicant needs to consider and accept.</p>

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Topic	Meeting date: 27 February 2026
<p>Programme Document Update</p>	<p>The Inspectorate welcomed the applicant’s updated information in its Programme Document (February 2026 version), such as the latest activities in respect of engagement, and notes that it continues to meet most of the expected content as set out in paragraph 10 of the government’s guidance on the pre-application stage.</p> <p>However, the applicant is referred to the Inspectorate’s previous advice on the 13 August 2025, that an outline of the ‘risks’ should be included in addition to how those risks will be managed. The Inspectorate also conveyed that it would be helpful if the Programme Document included an estimate of the generating capacity of the proposed development.</p> <p>It would also be helpful, for the Inspectorate and others, if the main issues section could include the names of any specific designated sites, protected landscapes, sensitive receptors (such as airfields) and/or heritage assets that require assessment and/or mitigation (as this helps provide context to the site and local area and the type of issues in discussion with relevant statutory parties).</p>
<p>Local Authority Engagement</p>	<p>The Inspectorate noted the progress the applicant is making with the relevant local authorities and the discussions held for them to secure technical specialists for certain topics (where there are identified gaps in the Council resources). The applicant confirmed that the Planning Performance Agreements have all been signed, with RMBC and CDC signing theirs in July 2025 but still awaiting the finalisation of procuring their external consultants.</p> <p>The applicant confirmed that North East Derbyshire District Council have now engaged since the last Project Update Meeting in November and engagement is ongoing.</p>
<p>Adequacy of Consultation Milestone (AoCM) statement</p>	<p>The Inspectorate advised that it is important to include the views and any relevant supporting material from the local authorities in the AoCM statement, together with the applicant’s summary of the elements of consultation which have been carried out compared with the components set out in the Programme Document and the Statement of Community Consultation. With the views of the local authorities and applicant together, the Inspectorate will be able to gain a holistic view on whether “the pre-application programme is on track, and if it is seriously adrift the Planning Inspectorate will advise the applicant about the</p>

	<p>steps necessary to enable the application to be submitted having fulfilled the statutory requirements” (using the wording at paragraph 25 of the government’s guidance on the pre-application stage).</p>
<p>Impact of AI in Examination</p>	<p>The applicant queried what the guidelines were for using artificial intelligence (AI) in examination for Nationally Significant Infrastructure Projects for all parties involved in the process.</p> <p>The Planning Inspectorate advised that it has recently issued new guidance on the use of (AI) as part of any appeal, application or examination being dealt with by the Planning Inspectorate and referred the applicant to the latest information in its procedural letters on the subject, such as the Rule 6 letter issued for the Norwich to Tilbury application.</p> <p>The Inspectorate would be continuing to review the use of AI in submissions as technology evolves and would issue updated guidance where necessary.</p> <p>The Inspectorate further advised that liaising with recognised interest groups on how to participate effectively in the examination (should the application be accepted), can help with the overall DCO process. The Inspectorate has a series of published Advice for Members of the Public on its Find a National Infrastructure website, for this purpose. The applicant stated that it was continuing to engage with parties in the local area.</p> <p>The Inspectorate also advised that the applicant declare its use of AI in any form during the application process, for example where such technology is used to review and summarise relevant representations. Where the applicant wishes to use data scraping of the Inspectorate’s website to collate data, the applicant should liase with the Inspectorate on timing to minimise potential impacts to the website.</p>
<p>Design Updates</p>	<p>The applicant gave an overview of any design updates.</p> <p>The Inspectorate advised the applicant to ensure that it clearly sets out how the good design criteria in the National Policy Statements have been applied in the application, as well as the evolution of the design, including how designated assets and sensitive receptors have been considered and mitigated (where needed), and how the design encompasses placemaking. Clarity in the design narrative is likely to reduce the number of questions from the Examining Authority during examination.</p> <p>The applicant confirmed it was already aware of the criteria on design and will be submitting a design document to</p>

	<p>demonstrate how it has satisfied design-related policy requirements and provide important context for the design of the project presented in the final form of the application.</p>
Targeted Consultation	<p>The applicant outlined that it has identified a few places where it needs to make minor amendments to the project boundary, so targeted consultation on these minor changes will run from 4th March – 3rd April 2026.</p> <p>The Inspectorate advised that the scope of assessment of any additional land outside of the red line boundary presented at scoping would need to be justified and explained in the Environmental Statement. The Inspectorate advised that consultation can help define an appropriate assessment scope.</p>
Grid Connection	<p>The Inspectorate advised the applicant to set out in the draft DCO and relevant application documents, clear reasoning for the extent of flexibility / optionality the applicant is seeking in relation to the grid connection corridor and the point of connection. The applicant should also provide an updated position on the deliverability / progress of the planned National Grid 'Long Lane' Substation, as an Examining Authority is likely to ask questions and / or seek a Statement of Common Ground if there is uncertainty. The applicant said that the cable route is reflected in the draft Order Limits and was progressing discussions with National Grid on the siting and consenting route for the new Substation.</p>
Land and Rights Update	<p>The Inspectorate advised to progress draft protected provisions with relevant statutory undertakers and where agreements can be reached as soon as possible before examination, to avoid such risks in the DCO process.</p> <p>The applicant pointed out that the lands and rights tracker is one of the last deliverables before submission and that the order limits would need to be fixed along with the Book of reference and land plans. The applicant will therefore submit a land right and negotiation tracker at submission date.</p> <p>The Inspectorate advised the applicant that the intention for the land and rights tracker being asked at pre-application is to give an indication as to what is expected during examination and to ensure efficient use of the examination period. The applicant instead gave an in-meeting update, which included a summary on where the land and rights negotiations were. Owing to the advanced stage of the pre-application process, the impending submission of the application and other circumstances, it was agreed in these circumstances that the applicant could provide updates</p>

	<p>during PUM meetings instead of submitting the pre-application tracker at pre-application.</p> <p>The Inspectorate suggested the applicant reviews the Land and Rights tracker for Keadby Next Generation Power Station Project as an example, prior to DCO submission</p>
AOB	<p>The Inspectorate advised that it can provide the applicant with the service level agreement (SLA) for hearing venues and the Inspectorate's requirements and can provide examples of other venues used by projects of a similar size.</p>
Issues Tracker	<p>[Post-meeting advice] The Inspectorate welcomed receipt of the applicant's Issues Tracker and the information provided. The Inspectorate advises the applicant on the following.</p> <p>General points:</p> <ul style="list-style-type: none"> • Whilst the tracker appears to cover the type of subjects relevant to the project and solar developments, it is brief in most areas and would benefit from including more detail about the outstanding matters with relevant statutory consultees to aid understanding. • There appear to be topics which the applicant seems content to leave to examination to resolve, some of which include matters relevant to assessment methodologies. It is critical that agreement is reached on such matters before the submission of the application to ensure an efficient examination and to reduce any risks. <p>Biodiversity</p> <ul style="list-style-type: none"> • There appears to be no reference of any views received from the host local planning authorities on biodiversity matters. These should be added to the Issues Tracker. • The tracker notes that surveys for protected species could be conducted outside of guideline periods. Justification for taking a different approach, citing any relevant precedents, should be included. <p>Agricultural Land</p> <ul style="list-style-type: none"> • It is noted that there is disagreement in respect of the soil survey sampling methodology and extent of surveying with Natural England. The applicant should do all it can to resolve this issue before submission of the application. <p>Cultural Heritage</p> <ul style="list-style-type: none"> • It is noted there is disagreement with Historic England in respect of survey methodology. The applicant should do all it can to resolve this issue before the submission of the application.

	<p>Glint and Glare</p> <p>There is reference to the need to provide design solutions and mitigation for highway receptors and Netherthorpe Airfield. It is essential that the applicant has considered this and is confident that there are robust options for mitigation available before submission of the application.</p>
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