



**WHITESTONE**  
solar farm

# **WHITESTONE SOLAR FARM**

## **Volume 5: Reports and Statements**

### **5.6 Potential Main Issues for Examination**

**Application Document ref. EN0110020/APP/5.6**  
**Revision 01**  
**June 2026**

**Planning Act 2008**  
Infrastructure Planning  
(Applications: Prescribed Forms and  
Procedure) Regulations 2009  
Regulation 5(2)(q)

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## REPORT

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Document status					
Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
Rev01	DCO Submission	LF	HC	SP	June 2026

Approval for issue		
Whitestone Net Zero Ltd		1 June 2026

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**Prepared by:**

**DWD Ltd**

**Prepared for:**

**Whitestone Net Zero Ltd**

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# 1 INTRODUCTION

## Background

- 1.1.1 This Potential Main Issues for Examination ('PMIE') document has been prepared by Whitestone Net Zero Ltd ('the Applicant') in relation to the Development Consent Order (DCO) Application for the construction, operation and maintenance, and decommissioning of the Whitestone Solar Farm (hereafter referred to as the 'Proposed Development').
- 1.1.2 This document has been prepared and submitted in compliance with the Nationally Significant Infrastructure Projects: 2024 Pre-Application Prospectus (March 2026) and Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('the APFP Regulations') which states: "*The application must be accompanied by (...) any other documents considered necessary to support the application*".
- 1.1.3 The purpose of this document is to provide the Examining Authority with a summary of the main residual issues with key stakeholders remaining at the time of the DCO Application's submission.
- 1.1.4 This document has been prepared in consultation with relevant statutory bodies and local authorities. It has been shared and the contents agreed, where possible, prior to the submission of the DCO Application.
- 1.1.5 The issues set out in the tables below do not constitute a definitive list of matters likely to be raised during the DCO Application's examination and do not preclude stakeholders from raising further concerns during the planning process. The regard which the Applicant has had to responses to the statutory consultation is provided in the **Consultation Report [EN0110020/APP/5.1]**.
- 1.1.6 The Applicant has prepared PMIE tables with the following stakeholders –
- Rotherham Metropolitan Borough Council;
  - City of Doncaster Council;
  - North East Derbyshire District Council;
  - Environment Agency;
  - Historic England;
  - Natural England; and
  - Yorkshire Wildlife Trust.
- 1.1.7 It is anticipated that a number of the issues outlined in this document may be resolved between the submission of the DCO Application and the start of examination, including once stakeholders have had an opportunity to review the DCO Application and through the evolution of matters, including the negotiation of 'protective provisions', where necessary. It is the Applicant's intention to continue to work with stakeholders throughout the DCO Application's examination to resolve issues wherever possible.
- 1.1.8 The Applicant envisages that these issues can be resolved during examination, including through the process of producing Statements of Common Ground. The information provided within the DCO Application will inform this process and

progress the discussion with the stakeholders beyond what is possible at the time of submission.

### **Potential Main Issues for Examination**

- 1.1.9 The tables below set out the remaining main issues with each of the corresponding stakeholders that have not been resolved prior to submission of the DCO Application.
- 1.1.10 The tables provide an overview of the issues held by these stakeholders, where this issue is addressed in the DCO Application and the Applicant's position on the likelihood of the issue being resolved prior to or during the examination. The tables include a Red/Amber/Green (RAG) rating to highlight the likelihood of each issue being resolved.

## 2 POTENTIAL MAIN ISSUES FOR EXAMINATION - CITY OF DONCASTER COUNCIL

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
CDC 1	<p><b><u>L VIA Landscape and Historic Landscape Character - Effects</u></b></p> <p>Due to the scale and nature of the Proposed Development, there will be impacts to landscape character, sensitive receptors, and the visual amenity of residents and people travelling through and around the area.</p>	<p>The Site where Whitestone 1 is located is comprised almost entirely of arable farmland. It is located to the south of Conisbrough, including the area known as Conisbrough Parks, which historically was a royal hunting ground. It is predominately located within the Doncaster Landscape Character Area: A1: Conisbrough and Denaby Coalfield Farmlands, and two field parcels are located within C1: Stainton to Edlington Limestone Plateau.</p> <p>In respect of Area A1, the Doncaster Landscape Character Area and Capacity Assessment Study identifies that this 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. Overall, the</p>	<p>Following on from statutory consultation, the Applicant has inherently reviewed the design of the Proposed Development, specifically the Order Limits, to reduce potential impacts upon landscape and visual for the area.</p> <p>The design of the Proposed Development is indicative at this stage, with the detailed design to follow post consent of the DCO. However, through the <b>Design Approach Document [EN0110020/APP/5.7]</b> and <b>ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]</b> the steps taken to get to the Order Limits (as shown in <b>ES Volume 3, Figure 3.1 Order Limits [EN0110020/APP/6.19]</b> presented at</p>		Low

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		<p>landscape value and quality are considered to be high. Similarly, the landscape of Area C1 is described within the Council's assessment as being distinctive, intact and of a high quality, and also an Area of Special Landscape Value.</p> <p>In both cases, the landscape strategy of the Council is to conserve.</p> <p>When having regard to the national policy requirements, the special landscape character of Whitestone 1 is a fundamental and overriding consideration. This special character, and the local and national policy support for its protection has not been attributed sufficiently high status in the assessments that have taken place to date.</p>	<p>this stage, including where land has been removed from the Order Limits for the purposes of reducing potential landscape impacts, is discussed in detail.</p> <p>The Applicant notes that design evolution and proposed mitigation should lessen The City of Doncaster's concerns regarding the landscape impacts.</p>		
CDC 2	<b><u>LVIA – Scope</u></b>	The issues raised during pre-application discussions include missing or incomplete consideration	The Applicant notes these queries set out by City of Doncaster Council, but as discussed during consultation		Low

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	<p>Potential for the Landscape and Visual Impact Assessment (LVIA) to be insufficient in scope if it does not comprehensively assess all relevant landscape and visual receptors, routes, viewpoints and areas of likely visibility, or clearly explain the methodology used to identify and assess likely significant effects arising from the Proposed Development.</p>	<p>of key receptors (such as PRoWs, settlements and designated landscapes), lack of clarity on which routes are affected or diverted, and insufficient representation of views and visibility (including viewpoint selection, coverage and presentation).</p> <p>There is also continued concern that important areas of potential visibility and user experience are not fully assessed, with no clear sequential route analysis and gaps carried through from the draft ES (e.g. omission of receptors, inconsistencies in figures and assessment approach).</p> <p>Overall, the scope is seen as insufficiently comprehensive and not yet clearly aligned with agreed methodology or consultation responses, limiting confidence that the LVIA captures the full extent of likely effects across Doncaster's area.</p>	<p>and engagement, this information has been updated from draft ES and is provided within the submitted <b>ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.7]</b>.</p> <p>The Applicant will continue the discussion on these elements following the Council's reviews of the updated Environmental Statement.</p>		

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CDC 3	<p><b>Cultural Heritage and Setting of Heritage Assets</b></p> <p>Potential for the Proposed Development to result in substantial harm to the significance and setting of heritage assets and the historic landscape, particularly within Conisbrough Parks, including impacts on designated assets (such as the Conisbrough Parks Romano-British Villa and Clifton Conservation Area) and the contribution of the wider landscape, topography and historic field</p>	<p>The City of Doncaster Council considers that the importance of the historic landscape and associated heritage assets within Whitestone 1 has been significantly understated within the assessment. CDC emphasises the exceptional heritage value of Conisbrough Parks, including its origins as a historic deer park, the survival of historic field boundaries and the contribution of long-range views and landscape openness to its significance. The Council considers that the Proposed Development would fundamentally harm, and in places destroy, this historic landscape character and the setting of key heritage assets, including Clifton Conservation Area, where the relationship between the limestone ridge and surrounding agricultural land is integral to its significance.</p> <p>CDC further raises concern that the current assessment of archaeological impacts remains provisional, with insufficient field evaluation</p>	<p>The Applicant has considered all elements noted by City of Doncaster Council regarding the Cultural Heritage and Setting of Heritage Assets associated with Whitestone 1.</p> <p>The Applicant's assessment confirmed that there are <b>No Significant Adverse</b> effects predicted at construction, operational and maintenance, and decommissioning phases. Regarding Indirect Effects to Setting, No Significant Adverse effects are predicted at construction, operation and maintenance or decommissioning. However, Moderate Adverse effects to two Scheduled Monuments are predicted: 1010828 Conisbrough Castle and 1491751 Conisbrough Parks Romano-British Villa. These effects are considered to be <b>Not Significant</b> in terms of EIA regulations. Moderate Adverse effects have been predicted to Barlborough Registered Park and</p>		Medium

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	patterns to their significance.	<p>undertaken to robustly establish the significance of archaeological remains and the full extent of potential impacts across the project lifecycle.</p> <p>Given the scale of harm identified, including impacts on both designated and non-designated heritage assets and their settings, CDC's position is that these effects cannot be adequately mitigated and that Whitestone 1 is fundamentally unsuitable for the Proposed Development in heritage terms.</p>	<p>Garden and Barlborough Conservation Area.</p> <p>Further details on how the Applicant has assessed this aspect can be found in <b>ES Volume 2, Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8]</b> and associated appendices.</p>		
CDC 4	<p><b><u>Biodiversity Net Gain</u></b></p> <p>Further information requested on BNG calculations and relevant management plans.</p>	<p>The City of Doncaster considers that expressing an intention to achieve a 10% minimum gain does not go far enough and would expect to understand the detailed gains that would be secured, rather than simply stating a minimum to be achieved. Given the specific nature of the Project overall, with the Order limits comprising three very separate and distinct land parcels, The City of Doncaster's expectation would be for each of the parcels to be appraised</p>	<p>The Applicant confirms that the Proposed Development as set out in Schedule 2 of the <b>draft DCO [EN0110020/APP/]</b> proposes to achieve the following BNG metrics:</p> <ul style="list-style-type: none"> <li>- Area habitat units = 28.35%</li> <li>- Hedgerow units = 30%</li> <li>- Watercourse units = 10.11%</li> </ul> <p>In terms of BNG being calculated for each of the three parcels, comprising Whitestone 1, Whitestone 2 and Whitestone 3, the Applicant is not proposing to do this. As per other</p>		Medium

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		individually for their biodiversity net gain opportunities.	<p>assessments we have considered all three parcels as one within the assessments given the Proposed Development does not split them out.</p> <p>Further information of this is provided within the biodiversity and nature conservation assessment at <b>ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]</b>.</p>		
CDC 5	<b><u>Biodiversity</u></b> Biodiversity impacts from Cable Route Corridor on woodland.	Regarding the Cable Route, habitats such as woodlands should be avoided as cable trenching in woodlands can be extremely disruptive and may result in much wider and extensive impacts than anticipated. This should be taken into account before a final route option is decided upon, rather than an approach which seeks to mitigate impacts arising once a route has been selected.	The Applicant confirms that the Cable Corridor proposed avoids elements of biodiversity, such as woodlands, where possible. The Applicant is proposing to use trenchless methods such as Horizontal Directional Drilling where required to avoid ecologically sensitive features such as woodlands. It should also be noted that in some cable corridor routes, the Applicant has included options within the Application but only one option will be pursued subject to		Medium

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		<p>Meeting held with Ecology Officers at The City of Doncaster to discuss statutory consultation comments, including comments on bats, GCN, invertebrates, and BNG. One key topic of the meeting was ensuring what was proposed for BNG was realistic in terms of what habitats could establish under panels etc.</p>	<p>detailed design post grant of the DCO.</p> <p>Access for surveys was obtained for the majority of the Order Limits; however, some sections of the Cable Corridor Study Area were not subject to field survey due to access constraints. Field surveys were therefore focused on key sections of the Cable Corridor where more sensitive habitats were considered most likely to occur, with the remaining sections assessed through desk-based methods. For those sections of the Cable Corridor where field surveys were not undertaken, the assessment was informed by publicly available sources, including aerial imagery, satellite data, and existing habitat and landcover datasets. This has enabled sufficient information to be available to determine an assessment based on worst case parameters.</p>		

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			<p>A commitment to complete surveys is provided in embedded mitigation through the <b>Outline Construction Environmental Management Plan (oCEMP) [EN0110020/APP/5.9]</b>, with the results informing post consent activities and details to be included in the CEMP secured through a requirement in Schedule 2 of the <b>draft DCO [EN0110020/APP/3.1]</b>.</p>		
CDC 6	<p><b><u>Agricultural Land</u></b> Loss of best and most versatile agricultural land from food production, and the extent to which the Proposed Development would undermine the economic and other benefits that this higher quality land provides, including its contribution to</p>	<p>The City of Doncaster notes that agriculture is a defining land use within the Borough, with a substantial proportion of the area in active agricultural use and a significant role in arable production. In that context, the Council considers that the loss of best and most versatile agricultural land to a long-term solar scheme is an important policy issue in its own right, not simply a matter of agricultural land classification methodology.</p>	<p>Loss of BMV land is deemed temporary by the Applicant as the land will return to existing use following the 60years of operation. The recent Tillbridge Solar Farm DCO, the Examining Authority's Recommendation Report concluded in paragraph 3.10.69 that over the lifetime of the scheme, there is likely to be a moderate beneficial effect on soil resource but a slight loss of BMV land, and ascribed neutral weight in the planning balance for temporary loss of BMV. The Secretary of State similarly ascribed neutral weight to</p>		Medium

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	<p>food security, the efficient use of natural resources and the long-term protection of soils.</p>	<p>CDC's position is that BMV land is important because national policy requires decision-makers to recognise its economic and other benefits and, where agricultural land is needed for development, to prefer poorer quality land to higher quality land. In the specific context of solar development, national policy and recent ministerial statements place clear weight on protecting higher quality agricultural land where possible and on maintaining food production as an important component of national security and resilience. The Council therefore considers that the use of BMV land for this Proposed Development should attract significant scrutiny and should not be treated as an acceptable default simply because the effects may be described as temporary.</p> <p>The Council is also likely to rely on the Doncaster Local Plan's broader strategy of protecting the countryside and supporting the sustainable use</p>	<p>the matter of soils and agriculture in the overall planning balance (paragraphs 4.28 and 7.6 of their Decision Letter).</p> <p>The Applicant confirms that continuing agricultural use within the Order Limits, where possible, will be done over the lifetime of the Proposed Development.</p> <p>Further information around this can be found within the <b>ES Volume 2, Chapter: 9 Ground Conditions and Land Quality [EN0110020/APP/6.9]</b> and <b>ES Volume 2, Chapter 15: Socio-Economics and Land Use [EN0110020/APP/6.15]</b>. Alongside this, further analysis on the temporary nature of the Proposed Development which is available within the <b>Planning Statement [EN0110020/APP/5.4]</b>.</p>		

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		<p>of the Borough's environmental resources. In CDC's view, BMV land is not only valuable because of its productive capacity for food and other crops, but also because it forms part of the Borough's finite soil resource and supports the long-term resilience of rural land use. For those reasons, CDC considers that the loss of BMV land for the Proposed Development raises a substantive planning concern, particularly if there is insufficient evidence that lower quality land has been prioritised or that continued meaningful agricultural use would be maintained.</p>			
<p>CDC 7</p>	<p><b>Green Belt</b> The Proposed Development is located within the Green Belt.</p>	<p>CDC raises concern in principle to the location of the Proposed Development within the Green Belt. In the Council's view, this part of the Borough performs an important strategic and local function as open countryside within a relatively settled and developed area, helping to maintain separation between settlements, check encroachment into the countryside and preserve the</p>	<p>The Applicant has confirmed that a Green Belt Assessment has been submitted as Appendix 2: Green Belt Assessment of the <b>Planning Statement [EN0110020/APP/5.4]</b>.</p>		<p>Low</p>

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		<p>openness and permanence of the Green Belt.</p> <p>The Council is therefore likely to consider that the introduction of extensive solar infrastructure, associated fencing, substations, BESS, access tracks and other engineered elements would erode both the spatial and visual openness of the Green Belt and diminish its role as an important natural asset. CDC is also likely to regard the proposal as conflicting with the <a href="#">City of Doncaster Council Local Plan</a>, which seeks to retain most of the Green Belt, protect the countryside and safeguard green spaces and wider green infrastructure, insofar as the development would introduce substantial built form and industrialising features into land intended to remain open and to preserve settlement separation.</p>			
CDC 8	<b>Duration of Operational Life</b>	The Council notes the emerging trend for applicants to seek a 60-year operational period for utility-scale	The Applicant is seeking a 60-year consent, which is consistent with other similarly sized solar projects		Low

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	<p>The decommissioning and restoration Requirement within the draft DCO and draft ES describe that the Proposed Development would have an operational life of 60 years.</p>	<p>solar development, but does not consider that this should be treated as an appropriate default for this Proposed Development. National policy recognises that 40 years is typical and that different operational periods may be sought; in the Council's view, that wording requires a site-specific justification rather than supporting a blanket assumption that 60 years is acceptable in all cases.</p> <p>CDC's concern is that a 60-year consent would prolong the presence of solar infrastructure, fencing, access tracks, substations and other engineered features in the landscape for a period that is likely to span more than one generation. That materially increases the duration of effects on landscape character, visual amenity, heritage setting, Green Belt openness and the experience of users of the PRoW and green infrastructure network. Even if the development is technically reversible at the end of its life, the Council considers that</p>	<p>including consents granted for Cottam, West Burton, Gate Burton and Mallard Pass solar farms, which have all been granted 60-year consents. It's important to be clear that National Policy Statement EN-3 paragraph 2.10.57 states that "<i>An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time periods of operation</i>" and does not impose or suggest a 40-year limit is required.</p> <p>In recent decisions the Secretary of State has confirmed that the 60- year consent lifespan is 'temporary and reversible for the majority of the land' (paragraph 4.167 of the Gate Burton decision) and it is the case for this Proposed Development that at the time of decommissioning the land will be reverted back to its original condition as specified within the <b>Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]</b>.</p>		

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		<p>reversibility after 60 years substantially reduces the practical weight that can be attached to “temporary” effects in the planning balance.</p> <p>Recent decisions do not, in CDC’s view, establish that 60 years should be accepted irrespective of context. For example, while projects such as Gate Burton, Mallard Pass, Cottam and West Burton were consented on a 60-year basis, those decisions reflect the particular planning balance and site circumstances of those schemes rather than a rule that 60 years is inherently acceptable in all locations.</p> <p>In this case, CDC considers that sensitivity is likely to vary across the Proposed Site, with W1 being relatively higher sensitivity. There may be some areas of the Site where a longer operational life is comparatively more acceptable because the land is less sensitive to development in landscape, visual,</p>			

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		<p>heritage or Green Belt terms. However, the Council's position is that this does not justify applying a single 60-year operational period across the whole Site, particularly where parts of the Proposed Development affect more sensitive landscapes and receptors. A more nuanced approach would be needed, with the duration of development responding to the relative sensitivity of different parcels and the persistence of harm likely to arise in each location.</p> <p>For those reasons, CDC is likely to argue that the Applicant has not yet demonstrated why a 60-year operational life is justified for this Proposed Development as a whole, and that the matter is likely to remain a key issue at Examination.</p>			
CDC 9	<b>Secondary consents – highways</b>	A pre-application meeting has been held on construction access, the treatment of secondary consents was not discussed in detail. In the absence of detailed access	Preliminary vehicle tracking and visibility splay assessments in accordance with the relevant design guidance have been undertaken to inform the development of the		Medium

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	<p>Uncertainty regarding the extent to which the powers sought within the draft Development Consent Order appropriately address or disapply the need for separate highway consents, and whether sufficient detail has been provided to demonstrate that all necessary approvals (including for access works, traffic management and works within the highway) can be secured and delivered in practice.</p>	<p>proposals, it is difficult to fully understand the likely position of the LHA; however, based on current feedback, the breadth of powers sought suggests that further discussion will be required to establish whether these are justified.</p>	<p>proposed access strategy and to confirm that the accesses are capable of accommodating the anticipated construction vehicles.</p> <p>Detailed access proposals will be developed and be supported, where appropriate, by Road Safety Audits undertaken at the detailed design stage following consent via a requirement in the <b>draft DCO [EN0110020/APP/3.1]</b>.</p> <p>Further detail on access strategy is included in <b>ES Volume 3, Appendix 13.2: Transport Statement [EN0110020/APP/6.20]</b>.</p>		
CDC 10	<p><b>Secondary consents – drainage</b></p>	<p>The DCO drafting appears to disapply the need for consents under the Land Drainage Act.</p>	<p>These disapplications are sought on the basis that they address matters whose merits and acceptability can,</p>		Medium

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	<p>Uncertainty regarding the extent to which the powers sought within the draft Development Consent Order appropriately address or disapply the need for separate drainage consents, and whether sufficient information has been provided to demonstrate that all necessary approvals (including those under the Land Drainage Act and for works affecting ordinary watercourses and drainage infrastructure) can be secured and delivered in practice.</p>	<p>Based on the engagement with the LLFAs to date, it is not clear that sufficient information has been provided to support this approach, and further clarification is required.</p>	<p>and will, already have been sufficiently considered and resolved if the Order is made, notably in relation to the provisions under the Land Drainage Act.</p> <p>However, the Applicant is open to further discussions around this element of the <b>draft DCO [EN0110020/APP/3.1]</b> wording post submission.</p>		

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CDC 11	<p><b><u>Effects on PRowS</u></b></p> <p>Potential for the Proposed Development to adversely affect the use, accessibility and amenity of Public Rights of Way through construction activity, temporary closures/diversions, and the proximity of infrastructure.</p>	<p>The City of Doncaster Council raises significant concerns regarding the treatment of PRowS, noting that insufficient distinction has been made between different user groups (including pedestrians, cyclists and equestrians), and that the assessment underrepresents the importance of the network within a predominantly rural area. Concerns are raised regarding the limited buffers between PRowS and solar infrastructure, resulting in reduced visual amenity and an increasingly enclosed and urbanised experience for users.</p> <p>CDC also highlights concerns regarding the use of PRowS for construction access and traffic, the adequacy of alternative routes during temporary closures, and the need to maintain continuous access along key routes, particularly bridleways. Further detail is sought on path design, maintenance, and long-term management, alongside</p>	<p>Through the design process, the Applicant has sought to minimise visual impacts around public rights of way by including a 15m offset between PRowS and solar panels, while also seeking to remove panels from a field on one side of the PRow altogether, whenever possible. (See <b>Design Approach Document [EN0110020/APP/5.7]</b>). Where it was not possible or practical to further reduce panels, the Applicant has included landscaping to create a natural screening to reduce impacts, as shown in the <b>masterplan [EN0110020/APP/2.7]</b> and managed by the <b>oLEMP [EN0110020/APP/7.6]</b>.</p> <p>The management of the PRowS will be dealt with through the <b>Outline PRow Management Plan [EN0110020/APP/5.14]</b> which is to be secured through the <b>Draft DCO [EN0110020/APP/3.1]</b>.</p>		Medium

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		opportunities to enhance the network, including better integration of permissive paths and provision for equestrian use.			
CDC 12	<p><b><u>Glint and Glare</u></b></p> <p>Potential for glint and glare effects arising from solar panels to impact aviation receptors, road users, and other sensitive receptors, including Public Rights of Way and nearby communities.</p> <p>CDC also expects that the assessment considers effects on all relevant receptors, including road users and users of PRowS,</p>	The City of Doncaster Council raises significant concerns regarding the potential effects of glint and glare on Doncaster Sheffield Airport, noting that the airport is expected to reopen and should be treated as an operational receptor within the assessment baseline. CDC emphasises that the airport is a key strategic priority and that the impacts on aviation safety and operation must be fully assessed and robustly evidenced within the ES.	The Applicant has completed a glint and glare assessment, which is included in <b>ES Volume 2, Chapter 16: Other Environmental Topics [EN0110020/APP/6.16] and Appendix 16.2 Glint And Glare report</b> . Potential significant impacts were identified for residential receptors only, so the Applicant included additional areas through the targeted consultation described in the <b>Consultation Report [EN0110020/APP/5.1]</b> where landscaping could be included to reduce potential impacts. There are no remaining significant impacts.		Medium

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	<p>and that appropriate mitigation is identified where impacts are predicted. The Council's position is that the current level of information is insufficient and requires further detailed assessment to demonstrate that impacts can be appropriately managed.</p>				
CDC 13	<p><b><u>Green Infrastructure and Recreational Network</u></b></p> <p>Potential for the Proposed Development to adversely affect the</p>	<p>The City of Doncaster Council raises concerns that the Proposed Development does not adequately reflect the importance of green infrastructure within a predominantly rural and high-quality landscape, particularly in relation to the integration of PRowS, landscape character and ecological assets.</p>	<p>The <b>oLEMP [EN0110020/APP/5.13]</b> submitted with the Application describes the consideration of Green Infrastructure and Recreational Network throughout the design process of the Proposed Development.</p>		<p>Low</p>

POTENTIAL MAIN ISSUES FOR EXAMINATION

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Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
	<p>function, accessibility and quality of green infrastructure, including the PRow network, landscape character and opportunities for recreation and ecological enhancement.</p>	<p>CDC emphasises that the landscape of Whitestone 1 is of high value and subject to a strategy of conservation, forming a key component of the Borough's green infrastructure resource.</p> <p>Concerns are also raised regarding the limited buffers and proximity of solar infrastructure to PRowS, which may reduce visual amenity and diminish the recreational value of these routes, alongside insufficient consideration of how different user groups (including equestrians) are accommodated within the wider network.</p> <p>CDC would expect a more comprehensive approach demonstrating how the Proposed Development would maintain and enhance green infrastructure, including improved connectivity, high-quality permissive routes, and long-term management of landscape and ecological features. The</p>	<p>The mission statement for the Proposed Development is:  <i>"to embed good design by maximising the amount of clean energy generated to export to the National Grid, crafting a development that is socially and environmentally sensitive; engaging in meaningful conversation with communities and taking account of people's visual amenity. The project will embed sustainability and resilience, enhancing biodiversity and recreational access across the landscape".</i></p> <p>The mission statement and design principles, as set out in the <b>Design Approach Document [EN0110020/APP/5.7]</b>, exist to help strike the balance, to both maximise renewable energy production while minimising impacts on the local environment. To meet the principle of enhancing recreational access across the landscape, the Applicant has consulted with the community and local stakeholders</p>		

POTENTIAL MAIN ISSUES FOR EXAMINATION

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		Council's position is that, as currently presented, the proposals risk fragmenting and degrading the existing green infrastructure network, rather than delivering meaningful enhancement.	to identify existing permissive paths and propose new permissive paths to create circular routes across the Site and improve access being key locations.		
CDC 14	<p><b>Noise</b></p> <p>Potential for the Proposed Development to emit noise from some of the associated infrastructure during operation, as well as the noise associated with construction and decommissioning.</p>	<p>The City of Doncaster understands that the target level for new development is indicated to be +5dB.</p> <p>The City of Doncaster noise specialist have referenced the adopted Local Plan (at Appendix 11) which makes clear that the target for all new noise generating development should be +0dB above the existing background levels.</p>	<p>The Applicant will continue to commit to +5dB noise limits in accordance with guidance. Noting that operational noise has been assessed by implementing BS 4142 in the context of Noise Policy Statement for England (NPSE) to avoid significant adverse effects at +5dB above background depending on context</p> <p>The Applicant is seeking to agree this matter with The City of Doncaster; however, should be noted that discussions remain ongoing.</p> <p>Further information of this is provided within the noise assessment at <b>ES Volume 2, Chapter 14: Noise and Vibration [EN0110020/APP/6.14]</b>.</p>		High

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
CDC 15	<p><b>Flood Risk</b></p> <p>Uncertainty regarding whether the measures proposed to avoid, reduce and manage flood risk are sufficient, appropriately designed and capable of being delivered without creating new flood risk or drainage issues elsewhere.</p>	<p>The Council and Lead Local Flood Authority understand that the detailed Flood Risk Assessment would be submitted as part of the Application. However, at this stage they do not have sufficient detail to understand how flood risk is proposed to be avoided, reduced and managed across the Proposed Development.</p> <p>In the absence of that detail, the Council and LLFA are unable to conclude whether the proposed approach would avoid creating unacceptable impacts, including increased flood risk, inadequate compensation or drainage arrangements, or other matters that may give rise to objection. There is therefore a concern that, once the FRA is available, it may identify issues which are challenging for the Applicant to address and which could remain unresolved into Examination.</p>	<p>The Applicant can confirm that a detailed Flood Risk Assessment has been conducted and is submitted with the application at <b>ES Volume 3, Appendix 10.2: Flood Risk Assessment [EN0110020/APP/6.20]</b>.</p> <p>The Applicant will meet with CDC to discuss this following the submission and acceptance of the DCO Application.</p>		High

# 3 POTENTIAL MAIN ISSUES FOR EXAMINATION – ROTHERHAM METROPOLITAN BOROUGH COUNCIL

Ref	Description of Issue	Stakeholder Position	Applicant’s Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
RMBC 1	<p><b>Landscape and Visual</b></p> <p>Due to the scale and nature of the Proposed Development, there is potential for impacts to Landscape Character, sensitive receptors, and the visual amenity of the area.</p>	<p>From an RMBC perspective, the principal concern relates to the scale, concentration and persistence of significant landscape and visual effects within Rotherham’s administrative area, particularly where these affect locally valued but undesignated landscapes and publicly accessible receptors.</p> <p>The assessment identifies that the Central Rotherham Coalfield Farmland (LCA 8)—which forms the host landscape for much of W2—is subject to Moderate to Major adverse (Significant) effects at Year 1 and continuing Moderate adverse (Significant) effects at Year 15, indicating a sustained alteration to</p>	<p>Following on from statutory consultation, the Applicant has inherently reviewed the design of the Proposed Development, specifically the Order Limits, to reduce potential impact upon the local landscape.</p> <p>The design of the Proposed Development is indicative at this stage, with the detailed design to follow post consent of the DCO. However, through the <b>Design Approach Document [EN0110020/APP/5.7]</b> and <b>ES Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]</b> the steps taken to get to the Order Limits (as shown in <b>ES Figure 3.1 Order Limits [EN0110020/APP/6.19]</b> presented at this stage, including</p>		Low

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		<p>landscape character arising from the introduction of large-scale solar infrastructure, loss of openness and increased industrialisation of the rural landscape.</p> <p>RMBC is also particularly concerned about significant visual effects on receptors within and around settlements such as North Anston, Wickersley, Ulley and Harthill, and along key PRoWs and recreational routes, where users with high sensitivity to views experience Moderate to Major adverse effects, including several viewpoints that remain significant even after mitigation has matured. These effects often arise from elevated or open vantage points and routes where the Proposed Development occupies a large proportion of the view, reducing the perceived rural character and amenity of the landscape. Overall, RMBC's concern would centre on the extent to which significant adverse effects are experienced across both the</p>	<p>where land has been removed from the Order Limits for the purposes of reducing potential landscape impacts, is discussed in detail.</p> <p>The Applicant notes that design evolution and proposed mitigation should lessen RMBC's concerns regarding the landscape impacts.</p>		

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		<p>landscape resource and publicly experienced visual amenity within its area, and the limited reduction of these impacts over time in key locations, notwithstanding embedded mitigation.</p>			
<p>RMBC 2</p>	<p><b>Scope of the LVIA</b></p> <p>Potential for the Landscape and Visual Impact Assessment (LVIA) to be insufficient in scope if it does not comprehensively assess all relevant landscape and visual receptors, routes, viewpoints and areas of likely visibility, or clearly explain the methodology used to identify and assess likely significant effects arising from the</p>	<p>The Council has raised concerns regarding the scope of the LVIA, and the extent to which sensitive receptors are considered within the draft ES.</p> <p>The Council's concerns centre on the LVIA not fully capturing the worst-case visual and experiential effects, particularly in relation to PROWs and settlement edges, where receptors appear to be grouped rather than assessed individually and without a clear sequential assessment of changing views along routes.</p> <p>There is also uncertainty around seasonal scenarios (with a reliance on summer year-15 effects rather than demonstrating winter worst case), limited clarity on the treatment of</p>	<p>The Applicant notes these queries set out by Rotherham Metropolitan Borough Council, but as discussed during consultation and engagement, this information has been updated from draft ES and is provided within the submitted <b>ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.7]</b>.</p> <p>The Applicant will continue the discussion on these elements following the Council's reviews of the Environmental Statement.</p>		<p>Low</p>

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
	Proposed Development.	<p>temporary PRow diversions given the long construction period, and gaps in supporting information such as topographical context and viewpoint coverage.</p> <p>In addition, elements such as the absence of a formal RVAA, treatment of landscape receptors (e.g. country parks and ASLV), and previous issues raised in the draft ES (including omissions in representative viewpoints and receptor coverage) indicate that the scope may not yet robustly evidence that all significant landscape and visual effects have been identified and assessed.</p>			
RMBC 3	<p><b>Cultural Heritage and Setting of Heritage Assets</b></p> <p>Potential for the Proposed Development to result in adverse</p>	<p>Rotherham Metropolitan Borough Council considers that the Proposed Development has the potential to result in harm to the setting of heritage assets, particularly where these are experienced within open or elevated</p>	<p>The Applicant has considered all elements noted here by Rotherham Metropolitan Borough Council regarding the local Cultural Heritage of the area and the Setting of local Heritage Assets. Further details can be found in <b>ES Volume 2, Chapter 8: Cultural Heritage and Archaeology</b></p>		Medium

POTENTIAL MAIN ISSUES FOR EXAMINATION

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
	effects on the significance and setting of designated and non-designated heritage assets, including Conservation Areas, Listed Buildings and Registered Parks and Gardens, arising from the introduction of large-scale solar infrastructure within a predominantly rural landscape.	<p>landscapes that contribute to their significance.</p> <p>Concerns relate to the extent to which the assessment has fully captured intervisibility, key views and the contribution of landscape context to heritage value, including from publicly accessible receptors such as PRowS and long-distance routes.</p> <p>RMBC would expect a robust assessment of setting impacts, including cumulative effects, supported by appropriate viewpoint analysis and visualisations, and clear justification where harm is identified, having regard to relevant policy and guidance.</p>	[EN0110020/APP/6.8] and associated appendices.		
RMBC 4	<p><b>Flood Risk</b></p> <p>Uncertainty regarding whether the measures proposed to avoid, reduce and</p>	The Council and Lead Local Flood Authority understand that the detailed Flood Risk Assessment would be submitted as part of the Application. However, at this stage they do not have sufficient detail to understand how flood risk is proposed to be avoided, reduced	The Applicant can confirm that a detailed Flood Risk Assessment has been undertaken and is submitted with the application at <b>ES Volume 3, Appendix 10.2: Flood Risk Assessment [EN0110020/APP/6.20]</b> .		High

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
	manage flood risk are sufficient, appropriately designed and capable of being delivered without creating new flood risk or drainage issues elsewhere.	and managed across the Proposed Development. In the absence of that detail, the Council and LLFA are unable to conclude whether the proposed approach would avoid creating unacceptable impacts, including increased flood risk, inadequate compensation or drainage arrangements, or other matters that may give rise to objection. There is therefore a concern that, once the FRA is available, it may identify issues which are challenging for the Applicant to address and which could remain unresolved into Examination.	The Applicant will meet with Rotherham Metropolitan Borough Council to discuss this following the submission and acceptance of the DCO Application.		
RMBC 5	<b>Biodiversity – Locally Designated Sites</b> Part of the Site is in a Local Wildlife Site (LWS), designated for skylark and species rich hedgerow. Potential for the	RMBC have raised concerns regarding the inclusion of Brampton Common LWS within the Order Limits for the Proposed Development.  RMBC addressed the matter of the Local Wildlife Site within their statutory consultation feedback, noting that the inclusion of Brampton Common LWS	The Applicant has discussed the inclusion of the Brampton Common Local Wildlife Site with RMBC alongside Yorkshire Wildlife Trust, Sheffield Wildlife Trust and the South Yorkshire Mayoral Authority.  The Applicant understands that at present the LWS, which is designated for breeding skylark population and		Medium

POTENTIAL MAIN ISSUES FOR EXAMINATION

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
	<p>Proposed Development to impact species and habitats in this designation.</p>	<p>within the Proposed Development is not supported.</p> <p>A meeting has been undertaken with RMBC, the Yorkshire Wildlife Trust, the Sheffield Wildlife Trust, and the South Yorkshire Mayoral Authority. Opportunities for enhancement within the LWS were discussed, and RMBC reiterated that they would not support solar arrays being installed within the LWS and suggested ways to compensate for the potential impacts.</p>	<p>species-rich hedgerows, is not being managed to achieve the objectives for which it was designated, and in particular that skylark populations there were below the average seen within the Site as a whole.</p> <p>Therefore, the Proposed Development is providing opportunities for enhancement to this area through mitigation and enhancement plans which are included in the <b>Outline Landscape and Ecology Management Plan (oLEMP) [EN0110020/APP/5.13]</b>. The strategy proposed to enhance the LWS includes:</p> <ul style="list-style-type: none"> <li>- Hedgerow Enhancement</li> <li>- Provision of Grassland</li> <li>- Reinstatement of wet grassland</li> </ul> <p>Further information on this is available within <b>ES Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]</b> and the <b>Outline Landscape and Ecology</b></p>		

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
			<b>Management Plan (oLEMP) [EN0110020/APP/5.13].</b>		
RMBC 6	<b><u>Biodiversity Net Gain</u></b> Further information requested on BNG calculations and relevant management plans.	Rotherham Metropolitan Borough Council considers that expressing an intention to achieve a 10% minimum gain does not go far enough and would expect to understand the detailed gains that would be secured, rather than simply stating a minimum to be achieved. Given the specific nature of the Project overall, with the Order limits comprising three very separate and distinct land parcels, The Rotherham Metropolitan Borough Council's expectation would be for each of the parcels to be appraised individually for their biodiversity net gain opportunities.	The Applicant confirms that the Proposed Development as set out in Schedule 2 of the <b>draft DCO [EN0110020/APP/]</b> proposes to achieve the following BNG metrics: <ul style="list-style-type: none"> <li>- Area habitat units = 28.35%</li> <li>- Hedgerow units = 30%</li> <li>- Watercourse units = 10.11%</li> </ul> In terms of BNG being calculated for each of the three parcels, comprising Whitestone 1, Whitestone 2 and Whitestone 3, the Applicant is not proposing to do this. As per other assessments we have considered all three parcels as one within the assessments given the Proposed Development does not split them out.  Further information of this is provided within the biodiversity and nature conservation assessment at <b>ES Volume 2, Chapter 6: Biodiversity</b>		Medium

REPORT

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			and Nature Conservation [EN0110020/APP/6.6].		
RMBC 7	<p><b>Agricultural Land</b> Loss of best and most versatile agricultural land from food production, and the extent to which the Proposed Development would undermine the economic and other benefits that this higher quality land provides, including its contribution to food security, the efficient use of natural resources and the long-term protection of soils.</p>	<p>Rotherham Metropolitan Borough Council notes that agriculture is a defining land use within the Borough, with a substantial proportion of the administrative area in active agricultural use and an important role in arable production. In that context, the Council considers that the loss of best and most versatile agricultural land to a long-term solar scheme is an important planning issue in its own right, not simply a matter of agricultural land classification methodology. RMBC's position is that BMV land is important because national policy requires decision-makers to recognise its economic and other benefits and, where agricultural land is needed for development, to prefer poorer quality land to higher quality land. In the specific context of solar development, the Council is likely to place weight on the protection of higher quality</p>	<p>Loss of BMV land is deemed temporary by the Applicant as the land will return to existing use following the 60years of operation. The recent Tillbridge Solar Farm DCO, the Examining Authority Recommendation Report concluded in paragraph 3.10.69 that over the lifetime of the scheme, there is likely to be a moderate beneficial effect on soil resource but a slight loss of BMV land, and ascribed neutral weight in the planning balance for temporary loss of BMV. The Secretary of State similarly ascribed neutral weight to the matter of soils and agriculture in the overall planning balance (paragraphs 4.28 and 7.6 of their Decision Letter).</p> <p>The Applicant confirms that continuing agricultural use within the Order Limits, where possible, will be done over the lifetime of the Proposed Development.</p>		Medium

REPORT

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		<p>agricultural land where possible and on maintaining food production as an important component of long-term resilience and sustainable land use.</p> <p>The Council is also likely to rely on the Rotherham Local Plan's broader strategy of safeguarding environmental resources and supporting the sustainable use of land. In RMBC's view, BMV land is valuable not only because of its productive capacity for food and other crops, but also because it forms part of a finite soil resource and supports the long-term resilience of rural land use within the Borough. For those reasons, RMBC considers that the loss of BMV land for the Proposed Development raises a substantive planning concern, particularly if there is insufficient evidence that lower quality land has been prioritised or that continued meaningful agricultural use would be maintained alongside the scheme.</p>	<p>Further information around this is available within the <b>ES Chapter: 9 Ground Conditions and Land Quality [EN0110020/APP/6.9]</b> and <b>ES Chapter 15: Ground Conditions and Land Quality [EN0110020/APP/6.15]</b>. Alongside this, further analysis on the temporary nature of the Proposed Development is available within the <b>Planning Statement [EN0110020/APP/5.4]</b>.</p>		

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
RMBC 8	<p><b>Green Belt</b> The Proposed Development is located within the Green Belt.</p>	<p>Rotherham Metropolitan Borough Council raises concern in principle to the location of the Proposed Development within the Green Belt.</p> <p>In RMBC's view, this part of the Borough performs an important strategic and local function as open countryside in a relatively densely populated area, helping to maintain separation between settlements, prevent encroachment into the countryside and preserve a sense of openness. The Council is therefore likely to consider that the introduction of extensive solar infrastructure, associated fencing, substations, BESS, access tracks and other engineered elements would erode both the spatial and visual openness of the Green Belt and reduce its value as an important natural asset.</p> <p>RMBC regards the proposal as conflicting with the Rotherham Local Plan, including Policy CS4 (Green Belt), Policy CS19 (Green</p>	<p>The Applicant has confirmed that a Green Belt Assessment has been submitted as Appendix 2: Green Belt Assessment of the <b>Planning Statement [EN0110020/APP/5.4]</b>.</p>		Low

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		Infrastructure) and Policy CS21 (Landscape), insofar as the development would introduce substantial built form and industrialising features into land intended to remain open and to safeguard the setting and separation of settlements.			
RMBC 9	<p><b>Transport and Access</b></p> <p>The LHA has raised concerns regarding the preliminary details of construction access which have been presented by the Applicant.</p>	<p>The Local Highway Authority expressed that the roads in the area can be either:</p> <ul style="list-style-type: none"> <li>○ Fast moving, with safe management key, including engagement on Long Lane with National Grid for their proposed substation</li> <li>○ Slow moving, with locals not expecting construction traffic</li> </ul> <p>In addition, that temporary traffic management areas may not be sufficient to ensure safety for some of the temporary accesses proposed, based on the locations identified by the Applicant.</p>	<p>The Applicant's team presented a series of 16 access points during a workshop with RMBC LHA, where the design approach taken was to not include the full Design Manual for Roads and Bridges (DRMB) standard displays.</p> <p>The purpose of the proposed design was to balance key ecological, water, land, access requirements, while remaining considerate of the safety requirements of the road network. Additionally, these access locations are typically for the cable corridor, which has a very low volume of deliveries.</p>		Medium

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
			<p>The Applicant acknowledges the requirement for safe access, and will collaborate with the Local Highway Authority on the refinement of the <b>outline Construction Traffic Management Plan [EN0110020/APP/5.12]</b> throughout the course of the examination.</p>		
RMBC 10	<p><b>Duration of Operational Life</b> The decommissioning and restoration Requirement within the draft DCO and draft ES describe that the Proposed Development would have an operational life of 60 years.</p>	<p>The Council notes the emerging trend for applicants to seek a 60-year operational period for utility-scale solar development, but does not consider that this should be treated as an appropriate default for this Proposed Development. National policy recognises that 40 years is typical and that different operational periods may be sought; in the Council's view, that wording requires a site-specific justification rather than supporting a blanket assumption that 60 years is acceptable in all cases.</p> <p>RMBC's concern is that a 60-year consent would prolong the presence of</p>	<p>The Applicant is seeking a 60-year consent, which is consistent with other similarly sized solar projects including consents granted for Cottam, West Burton, Gate Burton and Mallard Pass solar farms, which have all been granted 60-year consents. It's important to be clear that National Policy Statement EN-3 paragraph 2.10.57 states that "<i>An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time periods of operation</i>" and does not impose or suggest a 40-year limit is required.</p>		Low

POTENTIAL MAIN ISSUES FOR EXAMINATION

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		<p>solar infrastructure, fencing, access tracks, substations and other engineered features in the landscape for a period that is likely to span more than one generation. That materially increases the duration of effects on landscape character, visual amenity, heritage setting, Green Belt openness and the experience of users of the PRow and green infrastructure network. Even if the development is technically reversible at the end of its life, the Council considers that reversibility after 60 years substantially reduces the practical weight that can be attached to “temporary” effects in the planning balance.</p> <p>Recent decisions do not, in RMBC’s view, establish that 60 years should be accepted irrespective of context. For example, while projects such as Gate Burton, Mallard Pass, Cottam and West Burton were consented on a 60-year basis, those decisions reflect the particular planning balance and site circumstances of those schemes</p>	<p>In recent decisions the Secretary of State has confirmed that the 60- year consent lifespan is ‘temporary and reversible for the majority of the land’ (paragraph 4.167 of the Gate Burton decision) and it is the case for this Proposed Development that at the time of decommissioning the land will be reverted back to its original condition as specified within the <b>Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]</b>.</p> <p>The Applicant has assessed the decommissioning of the Proposed Development demonstrating that the Project is temporary with an end date of 60 years from first operation.</p>		

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		<p>rather than a rule that 60 years is inherently acceptable in all locations.</p> <p>In this case, RBMC considers that sensitivity is likely to vary across the Proposed Site, with some areas within W2 and W3 being more sensitive than others. There may be some areas of the Site where a longer operational life is comparatively more acceptable because the land is less sensitive to development in landscape, visual, heritage or Green Belt terms.</p> <p>However, the Council's position is that this does not justify applying a single 60-year operational period across the whole Site, particularly where parts of the Proposed Development affect more sensitive landscapes and receptors. A more nuanced approach would be needed, with the duration of development responding to the relative sensitivity of different parcels and the persistence of harm likely to arise in each location.</p>			

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		<p>For those reasons, RMBC is likely to argue that the Applicant has not yet demonstrated why a 60-year operational life is justified for this Proposed Development as a whole, and that the matter is likely to remain a key issue at Examination.</p>			
RMBC 11	<p><b>Secondary consents – highways</b></p> <p>Uncertainty regarding the extent to which the powers sought within the draft Development Consent Order appropriately address or disapply the need for separate highway consents, and whether sufficient detail has been provided to</p>	<p>A pre-application meeting has been held on construction access, the treatment of secondary consents was not discussed in detail. RMBC's LHA raised concerns regarding construction access and, in particular, the proposed approach to temporary traffic management.</p> <p>In the absence of detailed access proposals, it is difficult to fully substantiate the likely position of the LHA; however, based on current feedback, the breadth of powers sought suggests that further discussion will be required to establish whether these are justified.</p>	<p>Preliminary vehicle tracking and visibility splay assessments in accordance with the relevant design guidance have been undertaken to inform the development of the proposed access strategy and to confirm that the accesses are capable of accommodating the anticipated construction vehicles.</p> <p>Detailed access proposals will be developed and be supported, where appropriate, by Road Safety Audits undertaken at the detailed design stage following consent via a requirement in the <b>draft DCO [EN0110020/APP/3.1]</b>.</p>		Medium

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
	demonstrate that all necessary approvals (including for access works, traffic management and works within the highway) can be secured and delivered in practice.		Further detail on access strategy is included in <b>ES Volume 3, Appendix 13.2: Transport Statement [EN0110020/APP/6.20]</b> .		
RMBC 12	<p><b>Secondary consents – drainage</b></p> <p>Uncertainty regarding the extent to which the powers sought within the draft Development Consent Order appropriately address or disapply the need for separate drainage</p>	<p>The Council has raised concerns in respect of the proposed powers within the draft DCO relating to drainage, where the drafting appears to disapply the need for consents under the Land Drainage Act.</p> <p>Based on the engagement with the LLFAs to date, it is not clear that sufficient information has been provided to support this approach, and further clarification is required.</p>	<p>These disapplications are sought on the basis that they address matters whose merits and acceptability can, and will, already have been sufficiently considered and resolved if the Order is made, notably in relation to the provisions under the Land Drainage Act.</p> <p>However, the Applicant is open to further discussions around this element of the <b>draft DCO [EN0110020/APP/3.1]</b> wording post submission.</p>		Medium

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
	consents, and whether sufficient information has been provided to demonstrate that all necessary approvals (including those under the Land Drainage Act and for works affecting ordinary watercourses and drainage infrastructure) can be secured and delivered in practice.				
RMBC 13	<b>Public Rights of Way (PRoWs)</b> Potential for the Proposed Development to adversely affect the use, accessibility and amenity of	Rotherham Metropolitan Borough Council raises concerns regarding the adequacy of the assessment of PRoWs and recreational receptors, including the lack of clarity on which routes may be affected, closed or diverted, and how these changes would impact users.	Through the design process, the Applicant has sought to minimise visual impacts around public rights of way by including a 15m offset between PRoWs and solar panels, while also seeking to remove panels from a field on one side of the PRoW altogether, whenever		Medium

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
	<p>Public Rights of Way through construction activity, temporary closures/diversions, and the proximity of infrastructure.</p>	<p>There is concern that the assessment does not fully capture the experience of users along PRowWs, including the absence of sequential route analysis and limited representation of views from these routes within the LVIA.</p> <p>RMBC also highlights the need for clear identification and assessment of impacts on diverted routes, ensuring that any changes do not diminish accessibility or recreational value, and that the assessment reflects the sensitivity of PRowW users as receptors. In addition, concerns are raised regarding the reliance on PRowWs as part of construction access or sustainable transport assumptions, which may not be appropriate given their function and condition.</p> <p>Overall, RMBC seeks a more robust and transparent assessment of PRowW impacts, supported by clear mitigation, route management proposals and appropriate integration within the wider</p>	<p>possible. (See <b>Design Approach Document</b> [[EN0110020/APP/5.7]). Where it was not possible or practical to further reduce panels, the Applicant has included landscaping to create a natural screening to reduce impacts, as shown in the <b>masterplan</b> [EN0110020/APP/2.7] and managed by the <b>oLEMP</b> [EN0110020/APP/7.6].</p> <p>The management of the PRowWs will be dealt with through the <b>Outline PRow Management Plan</b> [EN0110020/APP/5.14] which is to be secured through the <b>Draft DCO</b> [EN0110020/APP/3.1].</p>		

POTENTIAL MAIN ISSUES FOR EXAMINATION

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		assessment of landscape and visual effects.			
RMBC 14	<p><b>Glint and Glare</b></p> <p>Potential for glint and glare effects arising from solar panels to impact receptors including the strategic road network, road users and surrounding land uses.</p>	<p>Rotherham Metropolitan Borough Council highlights the need for a more detailed and robust glint and glare assessment, particularly in relation to the Strategic Road Network (including the M1 and M18) where the Proposed Development is in close proximity. RMBC notes that National Highways will require an appropriately detailed assessment to understand potential safety implications for road users.</p> <p>There is concern that the current assessment does not yet provide sufficient evidence to demonstrate that glint and glare impacts on key receptors have been fully identified and assessed, and further work is required to ensure compliance with relevant guidance and to confirm whether mitigation is necessary. Overall, RMBC seeks clarity on the extent of potential effects and</p>	<p>The Applicant has completed a glint and glare assessment, which is included in <b>ES Volume 2, Chapter 16: Other Environmental Topics [EN0110020/APP/6.16]</b> and <b>ES Volume 3, Appendix 16.2: Glint And Glare report [EN0110020/APP/6.20]</b>. Potential significant impacts were identified, so the Applicant included additional areas through the targeted consultation described in the <b>Consultation Report [EN0110020/APP/5.1]</b> where landscaping could be included to reduce potential impacts. There are no remaining significant impacts.</p>		Medium

POTENTIAL MAIN ISSUES FOR EXAMINATION

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		assurance that impacts on transport receptors can be appropriately managed.			
RMBC 15	<p><b>Ground Conditions –</b> Landfill and Contamination Risk Potential for the cable corridor and associated infrastructure to interact with areas of historic landfill and made ground, giving rise to risks relating to contamination, ground stability, and construction feasibility.</p>	<p>Rotherham Metropolitan Borough Council raises concerns regarding the interaction of the proposed cable corridor with areas of landfill and potentially contaminated land, and the adequacy of information provided to assess associated risks. There is a need to demonstrate that appropriate risk assessment has been undertaken, including consideration of ground conditions, contamination pathways and the potential for disturbance during construction activities.</p> <p>RMBC would expect robust site-specific investigation and assessment, supported by clear mitigation and management measures to ensure that risks to human health, controlled waters and the environment are appropriately controlled. This should include clarity on construction techniques within sensitive areas (e.g.</p>	<p>The Applicant can confirm that the landfill located in close proximity to the Proposed Development has been considered throughout the process. The Applicant details further information around this in <b>ES Volume 2, Chapter 9: Ground Conditions and Land Quality [EN0110020/APP/6.]</b> in which there is a Mineral Safeguarding Assessment included.</p> <p>The <b>Outline Construction Environmental Management Plan [XX]</b> includes an <b>Outline Soil Management Plan</b> which discusses the contamination of soils and the processes involved to reduce any such cases. This will later be developed into detailed management plan post consent of the DCO, which Rotherham MBC will be involved in.</p>		Low

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		<p>trenching vs trenchless methods), and how any constraints associated with landfill sites would influence the final routing and design of the cable corridor.</p> <p>Overall, RMBC seeks assurance that the presence of landfill and made ground has been fully considered within the assessment and design process, and that appropriate controls will be secured through the DCO and associated management plans.</p>	<p>The Applicant will continue the discussion on these elements following the Council's reviews of the Environmental Statement, with the intention for agreement between both parties.</p>		
RMBC 16	<p><b>Green Infrastructure</b></p> <p>Potential for the Proposed Development to affect the function, connectivity and quality of green infrastructure, including impacts on landscape</p>	<p>Rotherham Metropolitan Borough Council raises concerns regarding the extent to which the Proposed Development integrates with and enhances existing green infrastructure networks, particularly in the context of significant and sustained landscape and visual effects across the Borough and the Council's efforts to improve green infrastructure within the areas where the Proposed Development is located.</p>	<p>The <b>oLEMP [EN0110020/APP/5.13]</b> s submitted with the Application describes the consideration of Green Infrastructure and Recreational Network throughout the design process of the Proposed Development.</p> <p>The mission statement for the Proposed Development is:  <i>"to embed good design by maximising the amount of clean energy generated to export to</i></p>		Medium

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
	<p>character, ecological networks, and publicly accessible green space.</p>	<p>The Council highlights that key receptors, including PRowS and recreational routes, form an important component of the wider green infrastructure network, and that the experience and function of these assets has not been fully captured within the draft Environmental Statement.</p>	<p><i>the National Grid, crafting a development that is socially and environmentally sensitive; engaging in meaningful conversation with communities and taking account of people's visual amenity. The project will embed sustainability and resilience, enhancing biodiversity and recreational access across the landscape".</i></p> <p>The mission statement and design principles, as set out in the <b>Design Approach Document [EN0110020/APP/5.7]</b>, exist to help strike the balance, to both maximise renewable energy production while minimising impacts on the local environment. To meet the principle of enhancing recreational access across the landscape, the Applicant has consulted with the community and local stakeholders to identify existing permissive paths and propose new permissive paths to create circular routes across the Site and improve access being key locations.</p>		

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
RMBC 17	<p><b>Siting and Layout of Substation and BESS (W2)</b>                      Uncertainty regarding whether the proposed location and extent of the substation and Battery Energy Storage System (BESS) within Area W2 can accommodate all required infrastructure, mitigation, and safety measures, including appropriate stand-offs, screening, and operational requirements.</p>	<p>Rotherham Metropolitan Borough Council raises concerns regarding the suitability and capacity of the proposed W2 substation and BESS location, noting that insufficient information has been provided at this stage to demonstrate that the site can accommodate all necessary elements within an appropriate layout. In particular, there is uncertainty as to whether adequate stand-offs can be achieved in relation to proposed landscape screening, retained vegetation, adjacent infrastructure (including the M1 motorway), and the footprint of the BESS and substation itself.</p> <p>The Council also notes that additional requirements are likely to arise through the Battery Safety Management Plan, including the need for buffers and separation distances, as well as potential infrastructure associated with fire suppression (e.g. water supply and storage), all of which will place further</p>	<p>The design of the Proposed Development has been developed throughout the pre-submission stage of the application. This is evident through <b>ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]</b> and <b>Design Approach Document [EN0110020/APP/5.7]</b> which sets out the process that the Applicant has undertaken for design/masterplan of all elements associated with the Proposed Development.</p> <p>It should also be noted that safety has been at the forefront of the project and the submitted <b>Outline Battery Safety Management Plan [EN0110020/APP/5.15]</b> sets out the mitigation measures proposed to ensure safety for users of the surrounding areas. Finally, a <b>BESS Plume Assessment [EN0110020/APP/7.2]</b> has been submitted with the application for the Council to review.</p>		Low

POTENTIAL MAIN ISSUES FOR EXAMINATION

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		<p>constraints on the developable area. At present, it is not clear that these requirements have been fully accounted for within the site layout.</p> <p>Furthermore, RMBC raises concern regarding the elevated siting of the substation and BESS, where any taller structures may be prominent in views from nearby residential areas, including Wickersley and Whiston. The Council considers that this has the potential to result in adverse landscape and visual effects which could otherwise be avoided through alternative siting or design approaches.</p> <p>In addition, given the proximity of the Proposed Development to the M1, it is understood that a plume assessment will be required, to be undertaken as part of or alongside the Battery Safety Management Plan. The outcomes of this assessment may introduce further constraints on layout and separation</p>	<p>The Applicant will continue the discussion on these elements following the Council's reviews of the Environmental Statement, with the intention for agreement between both parties.</p>		

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		<p>distances, which are not yet reflected in the current proposals.</p> <p>Overall, RMBC seeks assurance that the siting, scale and layout of the substation and BESS have been robustly tested, and that all operational, safety, environmental and mitigation requirements can be accommodated without giving rise to unacceptable effects.</p>			
RMBC 18	<p><b>Noise</b></p> <p>Potential for the Proposed Development to emit noise from some of the associated infrastructure during operation, as well as the noise associated with construction and decommissioning.</p>	<p>Noise from the proposed development has been calculated/modelled based on specific plant and equipment. The calculated rating levels shows that the Council's criteria of a noise rating level of no more than 0dB above background noise level is exceeded at various locations. There is therefore the potential for adverse impact on nearby sensitive receptors.</p> <p>When considering mitigation at the detailed design stage this needs to ensure that a rating level of no more than 0dB(A) above the prevailing background noise levels is achieved at</p>	<p>The Applicant will continue to commit to +5dB noise limits in accordance with guidance. Noting that operational noise has been assessed by implementing BS 4142 in the context of Noise Policy Statement for England (NPSE) to avoid significant adverse effects at +5dB above background depending on context.</p> <p>The Applicant will continue the discussion on these elements following the Council's reviews of the Environmental Statement, with the</p>		High

POTENTIAL MAIN ISSUES FOR EXAMINATION

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		all receptor locations and it is necessary that this rating level is not exceeded.	intention for agreement between both parties.  Further information of this is provided within the noise assessment at <b>ES Chapter 14: Noise and Vibration [EN0110020/APP/6.14]</b> .		

# 4 POTENTIAL MAIN ISSUES FOR EXAMINATION – NORTH EAST DERBYSHIRE DISTRICT COUNCIL

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
NE DD C 1	<b>Cultural Heritage</b> Inclusion of Barlborough Hall within cultural heritage assessment	North East Derbyshire District Council suggest that the Applicant includes Barlborough Hall, within Bolsover District, which is a registered park and garden and conservation area in the cultural heritage assessment.	The Applicant can confirm that Barlborough Hall has been included within the Cultural Heritage assessment as set out in <b>ES Volume 2, Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8]</b> .		High
NE DD C 2	<b>Green Belt</b> The Proposed Development is located within the Green Belt; comments raised around the lack of green belt assessment to date.	North East Derbyshire District Council have raised concerns about the location of the Proposed Development within the Green Belt. Noting that solar infrastructure is not one of the exceptions to inappropriate development in the Greenbelt laid out in policy SS10 or the NPPF.	The Applicant has confirmed that a Green Belt Assessment has been submitted as <b>Appendix 2: Green Belt Assessment of the Planning Statement [EN0110020/APP/5.4]</b> .		Medium

# 5 POTENTIAL MAIN ISSUES FOR EXAMINATION – NATURAL ENGLAND

Ref	Description of Issue	Stakeholder Position	Applicant’s Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
NE 1	<p><b>Biodiversity Licenses</b> Potential for European Protected Species and sensitive habitats and species to be impacted by the Proposed Development.</p>	<p>Natural England confirmed that mitigation licenses are required should there be any interaction with protected species.</p>	<p>The Applicant notes this, and results of protected species surveys suggests that a ‘Letter of No Impediment’ will predominantly be required, rather than mitigation licenses. The relevant Letter of No Impediment will be progressed accordingly by the Applicant.</p> <p>Further information on these survey results is within <b>ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]</b>.</p>		High
NE 2	<p><b>Agricultural Land Classification Surveys</b> Further information is requested around the agricultural land use assessments.</p>	<p>Natural England have raised concerns on the soil sampling methodology – noting that the sampling density for Whitestone 1, 2 and 3 were also undertaken at a sampling density of 1 per 2ha, and therefore were undertaken at a reconnaissance level.</p>	<p>The Applicant can confirm that the entirety of the solar array areas has been surveyed for Agricultural Land Classifications. However, the Applicant can confirm that surveying the cable corridors is deemed to be disproportionate given the temporary nature of the impact of cable laying on soils, and the current uncertainty of where the construction corridor would be</p>		Low

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		<p>Natural England's advice is that detailed surveys are required to inform appropriate soil handling techniques within a Soil Management Plan.</p>	<p>located within the proposed cable corridors. Further information on the ALC surveys is available within <b>ES Volume 2, Chapter 9: Ground Conditions and Land Quality [EN0110020/APP/6.9]</b>.</p> <p>Regarding the soil handling techniques, this information has been provided within the <b>Outline Soil Management Plan</b> set out in the <b>Outline Construction Environmental Management Plan [EN0110020/APP/5.9]</b>.</p>		
NE 3	<p><b>Biodiversity Net Gain</b> Ensuring a minimum of 10% BNG is met by the Proposed Development.</p>	<p>Natural England noted that at the time of submission of this application it will not be mandatory to meet the BNG requirement for NSIPs, the Applicant should provide at least 10% BNG.</p>	<p>The Applicant confirms that the Proposed Development as set out in Schedule 2 of the <b>draft DCO [EN0110020/APP/]</b> proposes to achieve the following BNG metrics:</p> <ul style="list-style-type: none"> <li>- Area habitat units = 28.35%</li> <li>- Hedgerow units = 30%</li> <li>- Watercourse units = 10.11%</li> </ul> <p>In terms of BNG being calculated for each of the three parcels, comprising Whitestone 1, Whitestone 2 and Whitestone 3, the Applicant is not proposing to do this. As per other assessments we have considered all three parcels as one within the</p>		High

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
			<p>assessments given the Proposed Development does not split them out.</p> <p>Further information of this is provided within the biodiversity and nature conservation assessment at <b>ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]</b>.</p>		
NE 4	<p><b>Water Quality</b> Assessment of hydrological links between SSSIs and the Proposed Development.</p>	<p>Natural England advised that all SSSIs with relevant hydrological links to the site should be considered for further assessment and identified as ecological receptors in the oCEMP where mitigation is required.</p> <p>Natural England noted that the mitigation measures are deemed acceptable.</p>	<p>The Applicant can confirm that Anston Woods SSSI is hydrologically connected to the Site and within the Study Area. No other SSSIs are within the Study Area.</p> <p>Further information on this is provided within the water resources assessment at <b>ES Volume 2, Chapter 10: Water Resources and Flood Risk [EN0110020/APP/6.10]</b>.</p>		High

## 6 POTENTIAL MAIN ISSUES FOR EXAMINATION – ENVIRONMENT AGENCY

Ref	Description of Issue	Stakeholder Position	Applicant’s Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
EA 1	<b>Groundwater</b> Potential for the Proposed Development to impact contaminated land risks within and outside the Site Boundary.	The Environment Agency raised that the Environmental Statement needs to fully reflect the risks posed to groundwater from the development, with inconsistencies and data omissions.	The Applicant can confirm that the Environmental Statement ensures all risks posed regarding groundwater have been included.  Further information is available within <b>ES Volume 2, Chapter 10: Water Resources and Flood Risk [EN0110020/APP/6.10]</b> .		High
EA 2	<b>Use of Culverts</b> Concerns around the proposed use of culverts for watercourse crossings.	The Environment Agency have confirmed that they are opposed to the culverting of any watercourses because of the potential adverse ecological, flood risk and geomorphological impacts.	The Applicant confirms that the use of culverts is proposed for a small number of crossings of ordinary water courses as detailed in <b>ES Volume 2, Chapter 10: Water Resources and Flood Risk [EN0110020/APP/6.10]</b> .  The Applicant is willing to discuss this further with the Environment Agency to ensure that a decision is satisfactory for both parties.		Medium

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
			Further information is available within <b>ES Volume 3, Figure 10.14: Watercourse Crossings [EN0110020/APP/6.19]</b> .		
EA 3	<b>Flood Risk Assessment</b>	The Environment Agency request a Flood Risk Assessment to be submitted with the Application.	<p>The Applicant confirms a Flood Risk Assessment has been undertaken and will be submitted with the Application.</p> <p>The Applicant has consulted with the Environment Agency on the Flood Risk Assessment methodology but is awaiting agreement.</p> <p>The details are available in <b>ES Volume 3, Appendix 10.2: Flood Risk Assessment [EN0110020/APP/6.20]</b></p>		Medium
EA 4	<b>Water Framework Directive</b>	The Environment Agency request a Water Framework Directive assessment to be submitted with the Application.	<p>The Applicant confirms a Water Framework Directive Compliance Assessment has been undertaken and will be submitted with the Application.</p> <p>The details are available in <b>ES Volume 3, Appendix 10.3: Water Framework</b></p>		Medium

**REPORT**

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
			Directive Compliance Assessment [EN0110020/APP/6.20].		

# 7 POTENTIAL MAIN ISSUES FOR EXAMINATION – HISTORIC ENGLAND

Ref	Description of Issue	Stakeholder Position	Applicant’s Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
HE 1	<p><b>Cultural Heritage</b> The surrounding area contains Heritage Assets and buried archaeology, the extent of which is unknown to a degree. Ongoing geophysics surveys will shed light on the most sensitive areas, and this will need to inform the emerging design of the Proposed Development and determine the scope of further archaeological investigations.</p>	<p>While Historic England did not raise direct comment regarding the archaeological investigations, they have requested that should further conversations be had with SYAS that they are involved where/if required.</p> <p>Historic England have also confirmed that other geophysical survey techniques should be considered in instances where magnetometry has demonstrably been shown not to work.</p>	<p>The Applicant notes this request and will identify and notify Historic England when its advice is required for discussions around archaeological investigation scope.</p> <p>Regarding the geophysical survey techniques, it can be confirmed that magnetometry is the most suitable geophysical survey technique for the majority of the Proposed Development area. However, an alternative geophysical survey technique, electromagnetic induction (EMI), will be trialled in areas of Whitestone 1 affected by green waste that obscures any archaeological anomalies present.</p> <p>Further information on archaeological assessments is available within <b>ES Volume 2, Chapter 8: Cultural Heritage and Archaeology</b></p>		High

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
			<b>[EN0110020/APP/6.8] and Volume 3, Appendix 8.5: Geoarchaeological Desk Based Assessment [EN0110020/APP/6.20].</b>		
HE 2	<b>Cultural Heritage</b> The methodology is not appropriately robust for the assessment of this scale	Historic England confirm that they are not in support of the approach to assigning value to heritage assets. Noting that the language and approach are not consistent with the National Planning Policy Framework nor Historic England's guidance	The Applicant can confirm that a meeting was held with Historic England in which it was discussed that the criteria for assigning value to assets would be refined accordingly with comments from Historic England.  Further information on this is available within <b>Volume 2, ES Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8].</b>		Medium
HE 3	<b>Study Area</b> Concerns around the proposed Study Area for Cultural Heritage	Historic England requested clarity around the 3km search area use for the cultural heritage assessment. At present, it is not entirely clear as to what the robust process was for ensuring that heritage assets beyond 3km have been properly assessed.	The Applicant can confirm that further information around the study area for the Cultural Heritage assessment is set out within <b>Volume 2, ES Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8].</b>		Medium

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
HE 4	<p><b>Conisborough Castle</b> Concerns around the potential interaction between Conisborough Castle and the Proposed Development</p>	<p>Historic England raises concerns around the lack of value placed on Conisborough Castle within the initial cultural heritage assessment.</p>	<p>The Applicant can confirm that a meeting was held with Historic England in which it was agreed that a dynamic assessment would be conducted for Conisborough Castle. In addition, it was discussed that the criteria for assigning value to assets would be refined accordingly with comments from Historic England.</p> <p>Further information on this is available within <b>Volume 2, ES Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8]</b>.</p>		<p>Medium</p>

# 8 POTENTIAL MAIN ISSUES FOR EXAMINATION – YORKSHIRE WILDLIFE TRUST

Ref	Description of Issue	Stakeholder Position	Applicant’s Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
YWT 1	<b>Biodiversity Surveys</b> Concerns regarding approach to surveys.	The Yorkshire Wildlife Trust raised concerns with the timing of surveys undertaken by the Applicant for the Proposed Development. Noting that the methodology does not comply with CIEEM Best Practice Principles, and without robust ecological survey data the proposals could also contravene the Wildlife and Countryside Act (WCA) 1981, therefore we would recommend this is rectified, with survey data collected in the appropriate survey seasons, prior to the DCO application submission	The Applicant can confirm that some surveys were completed outside of guidance periods to ensure as much baseline data as possible was collected across the Site even though there had been delays in obtaining land access for surveys. Although this approach was not the preferred scenario, it allowed baseline data to be collected in areas of the Order Limits that surveyors had been unable to visit previously, aiding in the Applicant’s understanding of the baseline conditions and therefore strengthening our assessment of potential impacts. Where baseline data is currently absent, the mitigation hierarchy has be applied where possible to avoid impacts to sensitive biodiversity features, and a worst-case assessment is presented. Further data will be collected post-submission in the correct season, to provide additional information at examination.		Medium

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
			Further details can be found in <b>Volume 2, ES Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]</b> .		
YWT 2	<b>Riparian Zones</b> Mitigation measures proposed for riparian zones.	Yorkshire Wildlife Trust requests for further wetland mitigation measures and enhancements to be included within the Proposed Development.	The Applicant can confirm that there are a range of enhancement and mitigation measures included within the Proposed Development. The Applicant has submitted an <b>Outline Landscape and Ecology Management Plan (oLEMP) [EN0110020/APP/5.13]</b> as part of the Application which discusses elements regarding enhancement and mitigation for Riparian Zones.		Medium
YWT 3	<b>Biodiversity Net Gain</b> Ensuring a minimum of 10% BNG is met by the Proposed Development.	Yorkshire Wildlife Trust noted that the applicant should ensure there is a commitment to Biodiversity Net Gain. The solar farm could provide an excellent opportunity to demonstrate how renewable energy projects can benefit biodiversity when managed appropriately.	The Applicant confirms that the Proposed Development as set out in Schedule 2 of the <b>draft DCO [EN0110020/APP/]</b> proposes to achieve the following BNG metrics: <ul style="list-style-type: none"> <li>- Area habitat units = 28.35%</li> <li>- Hedgerow units = 30%</li> <li>- Watercourse units = 10.11%</li> </ul> In terms of BNG being calculated for each of the three parcels, comprising Whitestone 1, Whitestone 2 and		High

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
			<p>Whitestone 3, the Applicant is not proposing to do this. As per other assessments we have considered all three parcels as one within the assessments given the Proposed Development does not split them out.</p> <p>Further information of this is provided within the biodiversity and nature conservation assessment at <b>ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]</b>.</p>		
YWT 4	<p><b>Local Wildlife Site</b> Interrelationship between Brampton Common Local Wildlife Site and the Proposed Development.</p>	<p>Yorkshire Wildlife Trust have raised concerns about the encroachment of solar panels onto the LWS, as current plans show solar arrays within the LWS boundary. This should be amended, due to LWS designation and the potential to restore this area of local importance from it's current degraded state; as the presence of solar infrastructure within such a sensitive habitat would mean</p>	<p>The Applicant has discussed the inclusion of the Brampton Common Local Wildlife Site with Yorkshire Wildlife Trust alongside Rotherham Metropolitan Borough Council, Sheffield Wildlife Trust and the South Yorkshire Mayoral Authority.</p> <p>The Applicant understands that at present the LWS, which is designated for skylarks and hedgerows, is not working to its expected designation. Therefore, the Proposed Development is raising</p>		Low

REPORT

Ref	Description of Issue	Stakeholder Position	Applicant's Position and Signposting	RAG	Likelihood of the issue being resolved during the Examination
		that potential restoration would not be feasible.	<p>opportunities for enhancement to this area through enhancement measures are included within the <b>Outline Landscape and Ecology Management Plan (oLEMP) [EN0110020/APP/5.13]</b>.</p> <p>Further information on this is also available within <b>ES Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]</b>.</p>		



**WHITESTONE**  
solar farm

## Contact

Whitestone Net Zero Ltd

[info@whitestonesolarfarm.co.uk](mailto:info@whitestonesolarfarm.co.uk)

0800 688 9936