



Adequacy of Consultation Representation Proforma

Under *Section 55(4)(b) of the Planning Act 2008 (PA2008)* the Planning Inspectorate, on behalf of the Secretary of State, must take any adequacy of consultation representation (AoCR) received from a local authority consultee into account when deciding whether to accept an application for development consent, and this will be published should the application be accepted for examination.

An AoCR is defined in s55(5) in PA2008 as “a representation about whether the applicant complied, in relation to that proposed application, with the applicant’s duties under sections 42, 47 and 48”.

Project name	Whitestone Solar Farm
Date of request	11 June 2026
Deadline for AOCR	25 June 2026
Return to	whitestonesolarfarm@planninginspectorate.gov.uk

Please complete the proforma outlining your AoCR on the above NSIP.

Local Authority	City of Doncaster Council
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In the opinion of the local authority, has the applicant complied with the legislative requirements listed below?

Please note that this is specifically about the statutory consultation(s) undertaken.

Assessment of Compliance - Required	
S42 Duty to consult	No – see below*
S47 Duty to consult local authority	Yes
S48 Duty to publicise	Yes

If you would like to give more detail on any of the above, please do so below.

Please keep it as succinct as possible and refer to facts and evidence related to consultation, rather than the merits of the application.



Additional comments - <i>Not compulsory</i>	
S42 Duty to consult	<p>* City of Doncaster Council (CDC) acknowledges that the Applicant has undertaken a programme of consultation activities, including the distribution of information leaflets, the organisation of in-person engagement events, the use of online consultation platforms, and the implementation of measures to support accessibility. On this basis, the Council is satisfied that the Applicant has, in principle, sought to comply with the requirements set out within the agreed Statement of Community Consultation (SoCC).</p> <p>Notwithstanding this, the Council notes that significant concerns have been raised by three bodies: Conisbrough Parks Parish Council and two local community groups, Save Our Greenbelt and the Firsby Residents Association. The representations submitted by these parties are appended to this response for the Examining Authority's consideration.</p> <p>Furthermore, while the Council recognises that the Applicant has sought to discharge its statutory obligations under Section 42 of the Planning Act 2008, it has been made aware of an apparent failure to serve the requisite notices on a number of landowners identified within the appended Parish Council and Local Group submissions. Concerns have also been raised regarding whether the consultation undertaken can be regarded as meaningful, particularly in light of the evolution of the scheme during the pre-application stage up to the point of submission.</p> <p>In the absence of clear evidence demonstrating that all relevant persons have been lawfully served in accordance with statutory requirements, the Council's position is that the Applicant may not have satisfied the consultation duties prescribed under Section 42 of the Planning Act 2008 as a result of this feedback.</p>
S47 Duty to consult local authority	No additional comments
S48 Duty to publicise	No additional comments
Any other comments	No additional comments

Survey Works Evidence

Park Lane Bridleway (W1)

Whitestone Solar Farm (EN0110020)

Submitted by **Firsby Residents Association (FRA)**

Evidence on Adequacy of Consultation

Submitted to: Rotherham Metropolitan Borough Council and City of Doncaster Council

Applicant: Whitestone Net Zero Ltd

Status: Works ceased; matters logged with Planning Enforcement investigations ongoing.

Document last updated: 01/03/2026

Purpose and Objective

This evidence pack provides a factual, time-stamped record of survey works undertaken between 20 January and 8 February 2026 on land accessed via Park Lane public bridleway.

The purpose of this document is to:

- Record observed site activity, access arrangements, and safety conditions
- Provide evidence of how the proposed development interacts with the local environment in practice
- Identify issues relevant to construction access, public safety, and use of the bridleway

This document is intended to inform the Councils' assessment, Local Impact Report, and statutory consultee considerations

Early Baseline Evidence of Construction Impacts

Although described as “temporary” survey works, the activities recorded between 20 January and 8 February 2026 provide a real-world preview of how the proposed development is likely to interact with its surroundings during construction.

The evidence shows that even at survey stage:

- The Park Lane public bridleway was used as the primary access route for vehicles, welfare units, plant and servicing lorries.
- Vehicle movements occurred along a narrow route with blind bends and no segregation between construction traffic and the public.
- The bridleway was repeatedly obstructed, including during set-up and demobilisation.
- Equestrian users reported unsafe conditions, and photographic and video evidence confirms reduced visibility and conflict risk.

These impacts did not arise from full construction activity, but from preparatory works alone. As such, they are a credible indicator of:

- Traffic volume and access pressure during construction
- Safety risks to walkers, cyclists and horse riders
- Limitations of Park Lane as a suitable access route

This evidence therefore has direct relevance to the assessment of construction traffic, access strategy, public safety and amenity impacts at DCO stage.

These impacts occurred during survey works only and therefore represent a baseline scenario, not a worst-case construction scenario.

Demonstrated Need for Proper, Independent Assessment

The record shows that key matters were not independently assessed before or during the works, despite clear and foreseeable risks.

No evidence has been provided of:

- A site-specific traffic or access management plan
- A risk assessment addressing use of a public bridleway on a blind bend
- Assessment of equestrian safety, visibility constraints or conflict points
- Independent confirmation of planning status prior to works commencing

Instead, apparent reliance was placed on:

- Self-determined interpretations of permitted development
- The assumption that temporary duration negated wider safety or highways duties
- Post-hoc correspondence rather than proactive risk management

This matters because if the same assumptions are carried forward into the DCO process, there is a risk that construction impacts will be systematically under-assessed. The survey phase demonstrates that planning, highways and safety considerations cannot be treated in isolation or deferred, particularly where public rights of way form the only viable access.

The evidence therefore supports the need for:

- Robust construction traffic and access assessment
- Early and transparent risk identification
- Independent scrutiny by the Local Planning Authority and statutory bodies, rather than reliance on developer interpretation alone.

Evidence of Consultation and Engagement Failure

Engagement with the local community during the survey period was limited, inconsistent, and largely reactive.

Multiple concerns relating to safety and access were raised by residents but were not substantively addressed during the works.

This contributed to unresolved risks during the period of activity and reduced community confidence.

These observations are also relevant to the adequacy of consultation, as the nature and impact of access via Park Lane were not clearly communicated or tested with affected users prior to or during the works.

Overall Significance

Taken together, this evidence pack shows that the survey works were not an isolated or trivial episode. They represent:

- An early stress-test of access and safety assumptions
- A warning signal regarding construction impacts
- A case study in what happens when assessment and engagement are deferred

For these reasons, the matters recorded here are directly relevant to:

- The Local Impact Report
- Assessment of construction traffic and access
- Public rights of way protection
- Community engagement and consultation adequacy considerations

These matters do not arise in isolation but provide an early indication of how access, safety and engagement issues may arise during construction.

The evidence should therefore be treated as material, not historic.

1. Timeline

Tuesday 20 January 2026 – Whitestone arrived using Park Lane Bridleway to access site location. Welfare/office cabin, 2m fencing, free standing CCTV, plant and metal ground protection installed on agricultural Green Belt land adjacent to Park Lane bridleway on a blind bend.

Access along the Bridleway was obstructed whilst the set up of the compound and infrastructure commenced. Numerous vehicles of different sizes were witnessed using the Bridleway during the day. Works commenced. (Photographic evidence obtained)

Daily vehicle usage on Park Lane for workers to carry out survey work.

Monday 26 January 2026 – Email received by Whitestone confirming commencement of trial trenching survey works be completed by mid-February alongside mention of other members of the team being on site. Reply sent from FRA requesting clarity on safety, access and planning.

Wednesday 28 January 2026 – 2 x works vehicles witnessed travelling at speed along Park Lane 4 x 4 and Small Tanker along Park Lane Bridleway towards the compound. (video evidence obtained)

Wednesday 28th January 2026 – Welfare Unit required servicing, Tanker vehicle parked on blind bend of Bridleway, access blocked whilst this work commenced. (Photographic evidence obtained)

Friday 30TH January 2026 – Email received from Whitestone giving Legal position asserting permitted development and reliance on GPDO. No reference to safety or highways.

Late January 2026 – Continuation of vehicles observed accessing site via Park Lane public bridleway.

Wednesday 28 January 2026 – FRA email sent to Mayor of Doncaster, Chief Executive and Monitoring Officer, Highways, Planning, PRow officers CC'd (unacknowledged) -

Thursday 29 January 2026 – FRA email sent to MP and SYMCA Mayor (unacknowledged).
Early February 2026 – Bridleway obstructed by toilet servicing vehicle; further vehicle movements recorded.

Monday 2 February 2026 – Horse rider reports unsafe conditions adjacent to compound.

Monday 2 February 2026 – Reported by Resident of Planning Enforcement investigations opened by a member of the community

Tuesday 3 February 2026 – FRA made aware by a member of the community the issue has been reported to the Health and Safety Executive (HSE) notified by community member.

Thursday 5 February 2026 – Works ceased; trenches backfilled; compound dismantled.

Thursday 5 February 2026 – Bridleway obstructed again during demobilisation; photographic and video evidence obtained.

Sunday 8 February 2026 – Park Lane Bridleway left in a unsafe condition for users due to works. (Photographic evidence obtained)

Monday March 23 2026 – Exclusion from Community Briefing

On 23 March 2026, the Applicant held a webinar for “community representatives” presenting updated proposals. Firsby Residents Association was not invited and had no representation, despite having attended previous engagement meetings in 2025.

This indicates a shift in engagement approach and demonstrates a continued pattern of selective engagement, particularly in the absence of any substantive communication with FRA since January 2026.

2. Site Context & Sensitivity

- Agricultural land designated as Green Belt which separates Doncaster and Rotherham .
- Site known historically as part of Conisbrough Parks / former deer park offering open views overlooking Conisbrough Castle and St Peters Church.
- Park Lane is a public bridleway and highway in law accessed off the A630 Sheffield Road
- Route includes blind bends with restricted visibility over a mile from A630 to compound,
- Regular use by walkers, cyclists and horse riders as main access to the open green space.
- No alternative vehicular access to the wider 1,300-acre Whitestone site.

3. Description of Works Observed

Between 01/20/2026 and 02/08/2026, the following activities were recorded:

- Arrival and parking of large vehicles and contractor vans on Park Lane and adjacent verges.
- Establishment of a temporary compound immediately after a blind bend, including fencing, signage, and storage of equipment.
- Excavation and subsequent backfilling of trial trenches on agricultural land.
- Installation of freestanding CCTV cameras directed at the bridleway.
- Repeated obstruction of the bridleway and carriageway by vehicles and materials, restricting public access and visibility.

All works occurred in the context of preparatory surveys for a proposed NSIP solar development, prior to submission of a Development Consent Order application.

4. Evidence Log

Photographs:

P1: Welfare unit being transported along bridleway

P2 : Workers vehicles parked

P3 – P5: Images of compound

P6 - P7: Blocking bridleway.

P8 :Service lorry travelling along bridleway.

P9 – P14:Blocking of bridleway during demobilisation / decommission of works

P15 – P16: Images of compound

P17,P18,P19 : Images of how bridleway and field left after work

Video Footage: (Not included within this version)

V1: Vehicle movements along bridleway.

V2: Bridleway obstruction during toilet servicing.

V3: Bridleway obstruction during demobilisation.

Statements from members of the public can be provided.

5. Correspondence Record

Developer:

26/1/2026 Email from Developer stating works has commenced (26th Jan) Reply asking for further details

30/1/2026 Detailed legal response from Whitestone 30TH Jan asserting permitted development and reliance on GPDO with landowners' permission. No mention of health and safety implications or the use of a bridleway for access, greenbelt or contact permissions with Local Planning or Highways. Tone of email was such that it was detrimental to any community

engagement as the legal reply inferred that Whitestone staff would not tolerate threats to staff. The tone of the response was perceived as discouraging further engagement.

No further engagement

Council / Authorities:

22/01/2026, community members notified the Public Rights of Way (PRoW) team about the ongoing works, specifically reporting that the bridleway was blocked and providing photographic evidence, including images of CCTV cameras. Officer Carnel responded, addressing the issue of physical obstruction and the orientation of the camera toward the bridleway, but did not reference potential dangers to users, disruptions to safe and easy passage, or concerns about the compound's placement on a curve with limited visibility or the risk of startling horses. There was no mention of a site visit, risk assessment, consideration for closure, or temporary safety measures. Officer Carnel concluded his email by stating he had raised the matter with Whitestone but indicated that the PRoW team would not pursue any further action at that time.

23/01/2026 -Community members notify Mayor of Doncaster, Roy Sykes (Head of Planning) and MP regarding safety risks not being assessed.

23/01/2026 – Roy Sykes email response to community member stating that he had been in touch with the Whitestone team to share the concerns raised. The reply was descriptive of what Whitestone had told him. Failing to acknowledge risk, safety, duration or management of the site.

23/01/2026 – Community member replies requesting clarification of site risk assessments, PRoW usage, Location of compound on a bend and the reliance of Park Lane as being the sole access. The email was sent in the interest of public safety and in a constructive manner. No acknowledgement.

23/01/2026 – Community member emails monitoring officer Doncaster Council to make them aware of potential safety issue at the site and lack of site visit to confirm safety of users of the Park Lane bridleway. No acknowledgement.

26/01/2026 Planning Enforcement acknowledgement to a member of the community with reference number 26/00035/M Case Officer Damian Brough stating they aim to investigate and be able to update you on your complaint within 3 to 4 weeks.

28/01/2026 Email from Mayor of Doncaster to a member of the community relaying officer position “Access to the site is being taken via the Park Lane entrance and as this route is a Public Right of Way, the Whitestone Project Team have assured the Council that it will remain open at all times and that no equipment will obstruct the right of way. Should the right of way become obstructed however, I would strongly advise you to formally notify the Council” This makes no mention of any safety issues that have been raised regarding the location on a bend and the usage of the bridleway.

28/01/2026 Firsby Residents Association email to Mayor, Chief Executive and Monitoring Officer – Making representations for residents and the community in relation to the works regarding Safety, Planning and Access to the site. no acknowledgement.

29/01/2026 Firsby Residents Association email to MP John Healey and SYCA Mayor Oliver Coppard – Making representations for residents and the community in relation to the works regarding Safety, Planning and Access to the site. no acknowledgement.

30/01/2026 - 30 January 2026 – Council–Developer Correspondence (Obtained via Neighbour disclosure via FOI request)

On 30 January 2026, an email exchange between the Local Planning Authority and Whitestone’s planning consultants (DWD) was disclosed to a community member and subsequently shared with FRA.

The correspondence shows that the Council requested a detailed planning rationale from Whitestone in order to assist with formulating its response to concerns raised by residents. Within that exchange, an initial view was expressed by the Council that the temporary use of the site for archaeological works “does not require planning permission,” subject to duration clarification. The developer’s detailed planning interpretation under the General Permitted Development Order (GPDO) was then provided for incorporation into the Council’s response.

The correspondence indicates that the developer’s interpretation of planning position formed the substantive basis of the Council’s reply to residents, with no reference within that exchange to an independently evidenced safety or highways assessment.

04/02/2026 Community member updated Planning Enforcement (Ref: 26/00035/M) with Whitestone’s legal response and additional concerns regarding planning, highways and safety matters.

08/02/2026 – Community member updated the Planning Enforcement reference number 26/00035/M stating when work stopped, asking for confirmation on how it will be recorded and considered as part of investigation.

12/02/2026 Planning Enforcement (Damien Brough) acknowledged receipt of further information and confirmed correspondence logged under Ref: 26/00035/M. Investigation ongoing pending consultation with Development Manager, with community member.

12/02/2026 HSE response received from member of the community advising that the matter falls within the remit of City of Doncaster Council (Planning / Highways / PROW).

12/02/2026 On behalf of a community member FRA issued formal correspondence to Public Rights of Way and Highways teams regarding recorded obstruction incidents and future safeguards. Planning Enforcement (Damien Brough) copied for awareness. Awaiting response

12/02/2026 FRA issued courtesy response to Councillor Greg Reynolds thanking him for raising concerns regarding tone of Whitestone correspondence. Greg Reynolds CCd Whitesone, MP etc

12/02/2026 FRA issued follow-up email to Mayor, Chief Executive and Monitoring Officer referencing original email of 28/01/2026 and requesting confirmation of logging and update. Reply from Council 13/02/2025 Administrative confirmation received from Chief Executive's office advising that correspondence had been forwarded to current Chief Executive (Damian Allen).

13/02/2026 – Email received from FRA from Planning Enforcement Officer Damien Brough acknowledged receipt of the Firsby Residents Association's email and confirmed it has been logged under Enquiry Ref 26/00032/M. He noted the points raised regarding planning legislation, permitted development rights, highways, and public safety, and advised that some concerns have already been resolved in line with the expected timeframe for temporary works. The Council must determine not only if a breach has occurred but also whether formal enforcement is proportionate and in the public interest, referencing the National Planning Policy Framework. Temporary archaeological trenching works are generally permitted or not considered development, but the investigation will assess if lasting planning harm has occurred and if action is expedient. The land's condition post-decommissioning and bridleway surface issues are being referred to Highways for further investigation. **A consultation with the Development Manager will take place to review all matters**, and a further update will be provided once the investigation concludes or additional information is received.

18/02/2026 Public Rights of Way Response – Andy Carnall Email received from the Public Rights of Way and Highways Records Lead Officer confirming that incidents previously reported in relation to obstruction and vehicle use on Park Lane bridleway were formally logged and investigated.

The response confirms:

- Assessments were undertaken regarding obstruction of the bridleway and vehicle use.
- Park Lane carries private vehicular rights in addition to its status as a public bridleway.
- Vehicle use is not unusual, but must be carried out without obstructing the bridleway.
- Any future vehicle movements associated with an approved solar farm would be covered by a Traffic Management Plan.

The email does not reference:

- Any site visit undertaken during the period of obstruction.
- Any specific findings from the investigation.
- Whether any breaches of highways legislation were identified.
- Any mitigation measures required or imposed at the time.
- Consideration of visibility constraints or equestrian safety on the blind bend.

Status: No formal enforcement action indicated by PROW at this stage. Matter recorded as investigated.

22/02/2026 – Briefing note sent to RH MP John Healey as requested after a member attended a surgery explaining the situation.

04/03/2026 – RH MP publicly raised concerns regarding damage and disruption caused by Whitestone survey works requesting a detailed response from the developer regarding their working practices and environmental safeguards.

6. Regulatory References & Status

- Planning Enforcement 26/00035/M
- HSE notification – Submitted; CAT-0326843 Response received on 11/02/2026 stating the substantive matter raised would be more appropriately addressed by City of Doncaster Council – Specifically the planning department and the Highways and the Public Rights of Way officer
- PROW / Highways concerns – Raised; no formal mitigation identified.

7. Issues Identified (High-Level)

Planning:

- Use of agricultural Green Belt land as an operational compound.
- Reliance on permitted development not independently confirmed by LPA.
- No temporary consent, prior notification or agreement evidenced.

Highways / PROW:

- Repeated obstruction of public bridleway.
- Vehicle use on bridleway for commercial purposes.
- No visible traffic or access management plan.

Health & Safety:

- No visible warning signage or mitigation.
- Noise and vehicle movements affecting equestrian users.
- No site-specific risk assessments have been evidenced including risks during both set up - operation and demobilisation.

8. Status at Close of Period 18/02/2026

- Planning Enforcement investigation ongoing (Ref: 26/00035/M)
- HSE notification redirected to Council
- Highways / PROW No formal enforcement action indicated by PROW at this stage. Matter recorded as investigated.
- Works ceased and compound removed
- Evidence pack updated with photographic and video record

9. Analytical Review of Developer Legal Response (30 January 2026)

This section highlights observations arising from the developer's stated position. A full assessment of statutory compliance is addressed separately.

This section provides a structured review of the legal position asserted by Whitestone in correspondence dated 30 January 2026. The purpose is not to determine breach, but to identify assumptions made, areas not addressed, and matters requiring independent assessment by the Local Planning Authority and relevant statutory bodies.

9.1 Reliance on Permitted Development (GPDO)

Whitestone asserts (in correspondence dated 30 January 2026) that the welfare cabin, fencing, CCTV and plant fall within permitted development under Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015.

Observations:

1. Self-Determination
 - The developer states that it “does not consider” planning permission to be required.
 - No evidence is provided that this interpretation was confirmed in advance by the Local Planning Authority.
 - The response relies on internal legal interpretation rather than independent determination.
2. Green Belt Context
 - The response states that the land being agricultural or Green Belt “does not modify the application of the GPDO.”
 - No specific reference is made to Green Belt openness, visual impact, or sensitivity.
 - No explanation is provided as to whether siting a compound adjacent to a bridleway on a blind bend affects Green Belt purposes.
3. CCTV (Part 2, Class F)
 - Class F applies to CCTV installed “on a building.”
 - The correspondence does not clarify whether the CCTV was mounted on buildings or freestanding poles.
 - If freestanding, this may not fall within Class F and may require alternative justification.
4. Fencing Height (Part 2, Class A)
 - Fencing adjacent to a highway is restricted to 1 metre in height.
 - A public bridleway is a highway in law.
 - The response assumes compliance but does not confirm height or distance from the bridleway.

9.2 Contradiction: “Not Development” vs “Temporary Operations”

Whitestone argues:

- Trial trenching is not “development” under Section 55 TCPA.
- Simultaneously relies on Part 4, Class A (temporary buildings for operations).

Observations:

- If trenching is not an “operation,” reliance on Class A may be internally inconsistent.
- The fallback reliance on Part 4, Class B (28-day use) is time-limited and strict.

This internal tension has not been independently clarified.

9.3 28-Day Rule (Part 4, Class B)

Whitestone confirms:

- Start date: 20 January 2026
- Total time not to exceed 28 days
- Weather delays do not extend the statutory limit

Observations:

1. The 28-day rule relates to use of land, not exemption from:
 - Highway legislation
 - Obstruction law
 - Health and safety obligations
 - Public nuisance considerations
2. The reliance on the 28-day provision does not remove:
 - Duties under the Highways Act 1980
 - Duties under the Road Traffic Act 1988
 - General duty of care for public safety
3. No evidence was provided of:
 - A site-specific traffic management plan
 - Risk assessment governing vehicle movements on the bridleway
 - Safety mitigation for blind bends and equestrian use

The 28-day provision was treated as a comprehensive shield, but it does not override safety or highways law.

9.4 Omission of Highways and Public Safety Considerations

The legal response is detailed on planning law but makes no substantive reference to:

- Section 130 Highways Act 1980 (duty to prevent obstruction)
- Section 34 Road Traffic Act 1988 (motor vehicle use on bridleways)
- Site-specific risk assessments
- Equestrian safety on a blind bend
- Traffic marshalling or mitigation
- Temporary signage or warning systems

Public safety and highways considerations were not substantively addressed in the legal reasoning.

9.5 HSE Referral

A notification to HSE resulted in redirection to the Council as the responsible authority. This indicates:

- Oversight responsibility rests with the Local Authority.
- The safety dimension was not externally regulated during the works

9.6 Tone and Community Engagement

The developer response of 30 January 2026 relied on legal interpretation of permitted development rights and **did not address site-specific safety or highways considerations.**

Subsequent correspondence from public authorities relied on developer-provided information, with no evidence of independent site assessment during the period of works.

9.7 Access as a Strategic Issue

The site is part of a wider 1,300-acre proposal with no internal road network. The survey phase demonstrated:

- Reliance on Park Lane bridleway as primary access.
- Repeated obstruction during set-up and demobilisation.
- No publicly visible traffic management structure.

This episode provides an early case study of access feasibility for future works.

10. Key Implications

These observations reinforce concerns regarding the adequacy of consultation and the reliability of the Applicant's assessment of impacts.

The evidence recorded demonstrates that:

- The Park Lane bridleway functioned as the primary access route
- Vehicle movements and site activity created conflict with public use
- No visible traffic management or safety mitigation was in place
- Issues raised during the works remained unresolved at the time

These observations are directly relevant to:

- Construction traffic and access strategy
- Public rights of way impacts
- Safety and risk management

The survey phase provides a real-world indication of how the proposed development may operate in practice.

Conclusion

The developer's response provides a comprehensive planning-law justification based on GPDO provisions. However, it:

- Relies on self-interpretation rather than independent confirmation.
- Does not substantively address key highways, safety, and access considerations relevant to public use of the bridleway
- Does not document safety mitigation measures.
- Does not detail risk assessments governing bridleway use.
- Does not engage specifically with Green Belt sensitivity.
- Includes tone that affected community confidence.

This section is retained for record and to inform any future assessment of access management, planning compliance, and community engagement at DCO stage.

10. Appendix

- Photographic (Added) video evidence (upon request)
- Maps showing compound location and bridleway alignment. (Upon Request)
- Copies of correspondence. (upon request)

Whitestone Survey Works – Park Lane Public Bridleway Photographs



P1 20.1.26 (Large vehicle travelling on Park Lane)



P2 20.1.26 (5 vehicles parked outside Conisbrough Lodge, Park Lane)



P3 21.1.26 (Compound placed immediately after blind bend)



P4 & P5 2 21.1.26 (CCTV Camera pointing on bridleway away from compound freestanding)



P6 28.1.26 (Blocking Park Lane after blind bend)



P7 28.1.26 (Taken from hidden footpath onto Park Lane)



P8 28.2.26 Park Lane Bridleway

Thursday 5th February 2026

Images P10 to P16 2.5.26 Blocking Park Lane bridleway on a blind bend

Taken from Video Footage



P9 5.2.26



P10 5.2.26



P11 3 5.2.26



P12 5.2.26



P13 6 5.2.26 Gap to get through



P14 7 5.2.26 with gap to get through

Images of compound



P15 Compound – Stand alone CCTV facing over compound , Fencing 1.8 -2 m Security Fencing



P16 Compound – Place next to Bridleway - Welfare cabin door opening onto public bridleway on metal sheets placed to support structure.



P17 Images of how bridleway and field left after work



P18 Images of how bridleway and field left after work



P19 Image of Bridleway after compound had been on the left

Map showing compound location and bridleway alignment

Location of Site on Park Lane blind bend



Adequacy of Consultation

Whitestone Solar Farm (EN0110020)

Submitted by **Firsby Residents Association (FRA)**

Evidence on Adequacy of Consultation

Submitted to: Rotherham Metropolitan Borough Council and City of Doncaster Council

Applicant: Whitestone Net Zero Ltd

Version V2

Executive Summary

This submission provides evidence which raises serious concerns as to whether the Applicant has complied with its statutory obligations under Section 42(1)(d) of the Planning Act 2008 in relation to the identification and consultation of persons with an interest in land within Firsby.

The duty under Section 42(1)(d) requires not only the identification of affected persons, but the exercise of reasonable diligence to ensure that all qualifying persons are identified and formally consulted.

Firsby is a small, discrete hamlet located within the Order Limits of the Proposed Development. Seven residential properties hold qualifying interests in land, including freehold ownership and rights of access over Firsby Lane, a recorded bridleway.

The evidence demonstrates that only two of the seven qualifying residential land interests were formally served with a Section 42 notice, while five properties with qualifying interests were not identified or consulted. In addition, a known institutional landowner, HS2 Ltd, holding interests in two properties, was not consulted and did not receive any Section 42 documentation.

The Applicant had prior knowledge of both individual and institutional land interests through pre-consultation engagement, yet failed to translate that knowledge into formal statutory consultation.

The Applicant's Adequacy of Consultation documentation states that all persons with an interest in land were identified and consulted under Section 42(1)(d). However, the evidence presented in this submission demonstrates that this is not the case.

This is not a minor or isolated omission. A majority of qualifying land interests within a defined and geographically contained hamlet were not identified or served notice. This indicates a fundamental deficiency in the Applicant's land referencing exercise.

In addition, the evidence identifies a pattern of inconsistent and informal engagement with both individual residents and the Firsby Residents Association. Informal engagement and general awareness do not satisfy the statutory requirement for formal consultation.

The duty under Section 42 is a positive obligation requiring diligent inquiry and formal service of notice on all qualifying persons. The evidence presented raises serious concerns as to whether this obligation has been fulfilled.

In these circumstances, there are substantive concerns regarding the adequacy and reliability of the Applicant's land referencing exercise and whether the statutory requirements of Section 42(1)(d) have been met.

These matters are directly relevant to the Councils' assessment of consultation adequacy and preparation of their Adequacy of Consultation Representation.

The evidence indicates that the Applicant's consultation is inadequate and fails to meet statutory requirements in the following key respects:

1. Failure to identify and consult all relevant persons under Section 42
2. Failure to ensure consultation was accessible and effective under Section 47
3. Failure to properly consider and respond to consultation feedback
4. Misrepresentation of the effectiveness of consultation undertaken

These failures have resulted in material prejudice to affected persons and undermine the integrity of the consultation process.

The Applicant's prior engagement with the Parish Meeting further demonstrates that Firsby was a known and identifiable community, reinforcing that the failure to serve individual qualifying persons arises from deficiencies in execution rather than identification.

In a hamlet comprising seven residential properties, five qualifying land interests were not identified or served with a Section 42 notice, including a known institutional landowner. This represents a systemic failure of the Applicant's land referencing exercise and raises fundamental concerns as to whether the statutory requirements for acceptance under Section 55 of the Planning Act 2008 have been met.

1.Purpose and Objective

This submission is provided to assist RMBC and CDC in assessing whether the Applicant has complied with the requirements of Section 42(1)(d) of the Planning Act 2008.

The document focuses on the identification of persons with an interest in land, the service of statutory consultation notices, and the consistency and completeness of engagement throughout the consultation process.

These matters are central to the assessment of whether the Applicant has fulfilled its statutory obligations and whether the consultation undertaken was sufficient to enable informed and meaningful participation by affected persons.

This document should be read alongside the supporting evidence pack, which provides a detailed and time-stamped record of site activity, correspondence, and engagement.

2.Context of Firsby

Firsby is a small and geographically isolated hamlet located within the Whitestone 1 (W1) site area. The settlement is directly affected by the proposed development and is encompassed by the Order Limits.

Firsby lies administratively within Rotherham Metropolitan Borough Council but is geographically enclosed by land within the City of Doncaster. Firsby forms part of the civil parish of Hooton Roberts and Firsby, which operates through a formally constituted Parish Meeting recognised within the Rotherham Metropolitan Borough Council democratic structure under the Local Government Act 1972.

The Parish Meeting is a statutory consultee for the purposes of Section 42 of the Planning Act 2008, and the Applicant has engaged directly with the parish structure throughout the pre-application process.

This establishes that the Applicant had clear and direct knowledge of Firsby as a defined settlement within the Order Limits, and an established line of communication with its representative structure.

In these circumstances, the failure to identify and serve individual persons with qualifying land interests within Firsby cannot reasonably be attributed to a lack of awareness. Rather, it demonstrates a failure to translate known land interests and established engagement into compliance with the statutory requirement for individual service under Section 42(1)(d).

3. Legal Framework

Section 42(1)(d) of the Planning Act 2008 requires the Applicant to consult each person who is within one or more of the categories set out in Section 44, including persons with an interest in land.

Persons with an interest in land include freehold owners, leaseholders, and those with rights over land, such as rights of access.

The requirement to consult is fulfilled through the formal service of notice. Awareness of a proposal, participation in meetings, or informal engagement does not satisfy the statutory requirement.

The duty to consult is a positive and proactive obligation. It requires the Applicant to exercise reasonable diligence in identifying all qualifying persons and ensuring that they are formally consulted.

Failure to identify and consult qualifying persons represents a failure to comply with the statutory requirements of Section 42(1)(d).

This represents a majority of affected land interests within a defined and geographically contained hamlet and indicates a systemic deficiency in the Applicant's land referencing process.

Assessment Against Section 42(1)(d)

Section 42(1)(d) requires the Applicant to identify and formally consult each person with an interest in land.

This duty is a positive obligation requiring reasonable diligence in identifying all qualifying persons and ensuring that they are given a meaningful opportunity to participate in the consultation process.

The evidence presented in this submission demonstrates that:

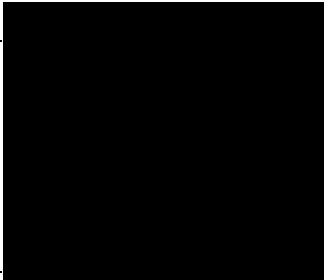
- persons with qualifying land interests were not identified;

- individuals who sought engagement were not responded to in a consistent or timely manner; and
- consultation was not carried out in a manner that enabled effective participation.

In these circumstances, there are serious concerns as to whether the Applicant has complied with its statutory duties under Section 42(1)(d).

4. Property Schedule

Ref	Ownership	Qualifying Interest	Access via Firsby Lane	Consulted S42 (1) (d)	Evidence Held
F1		Freehold + access rights	Yes	Yes	Consultation letter
F2		Freehold + access rights	Yes	No	HS2 EIR response
F3		Freehold + access rights	Yes	No	Title deeds + statement
F4		Freehold + access rights	Yes	No	HS2 EIR response
F5		Freehold + access rights	Yes	No	Title deeds + statement
F6		Freehold + access rights	Yes	No	Title deeds + statement

F7		Freehold + easement	Yes	Yes	Consultation letter
----	---	------------------------	-----	-----	------------------------

Key Finding: Identification and Consultation of Land Interests

The evidence demonstrates that five out of seven residential properties within Firsby, all of which hold qualifying interests in land, were not identified or served with a Section 42 notice.

This represents a majority of affected land interests within a defined and geographically contained hamlet. In such circumstances, the omission cannot reasonably be characterised as isolated or incidental, but instead indicates a systemic deficiency in the Applicant's land referencing process.

This is further reinforced by the omission of HS2 Ltd, a known institutional land interest, which was not identified or consulted despite prior engagement with the Applicant.

Taken together, this evidence raises serious concerns as to whether the Applicant has exercised the level of diligence required to identify and consult all qualifying persons under Section 42(1)(d).

5. HS2 Ltd – Failure to consult.

HS2 Ltd holds land interests in two residential properties within Firsby.

A formal response provided under the Environmental Information Regulations confirms that HS2 Ltd:

- Not identified as a statutory consultee; and
- Did not receive a Section 42 consultation letter or associated documentation.

This omission must be considered in the context of the Applicant's prior engagement with HS2 Ltd. Correspondence demonstrates that the Applicant had established contact with HS2 in advance of statutory consultation in relation to safeguarding and project interface matters.

This establishes that:

- HS2 Ltd was a known land interest;
- Engagement had already taken place; and
- The relevance of HS2 to the Order Limits was understood by the Applicant.

The failure to include HS2 Ltd within the statutory consultation process cannot therefore be attributed to difficulty in identification or reasonable oversight.

This omission cannot reasonably be attributed to difficulty in identification or reasonable oversight. The evidence demonstrates that HS2 Ltd was a known and engaged land interest prior to statutory consultation yet was not included within the Section 42 process.

In those circumstances, the omission cannot reasonably be attributed to difficulty in identification or reasonable oversight. The evidence indicates that HS2 Ltd was a known and previously engaged land interest, yet was not included within the statutory consultation process.

This raises significant concerns as to the robustness and consistency of the Applicant's land referencing exercise.

It is noted that HS2 Ltd has confirmed it is no longer identified as a statutory consultee under safeguarding arrangements following the lifting of safeguarding directions in July 2025.

However, this does not affect its status as a freehold land interest holder within the Order Limits. The obligation under Section 42(1)(d) applies independently to persons with an interest in land, regardless of their status as a statutory consultee.

The removal of safeguarding designation therefore has no bearing on the requirement to identify and serve HS2 Ltd as a qualifying person with a freehold interest.

(See appendix A & B)

6. Access via Firsby Lane (Bridleway)

All seven residential properties benefit from rights of access over Firsby Lane. However, the primary qualifying interest in each case is the freehold ownership of the properties themselves. The existence of access rights is therefore a supplementary consideration and does not form the primary basis of the Section 42 obligation.

Rights of access over Firsby Lane constitute qualifying interests in land for the purposes of Section 42(1)(d). The shared and interdependent nature of these rights means that failure to identify and consult one party is not isolated in effect but has implications across the entire group of affected properties. In this context, the omission of multiple residents with access rights represents a failure to recognise a collective and material land interest.

While an alternative route exists via Ravenfield, this does not constitute a lawful or recognised access route for residential purposes.

7. Engagement with Firsby Residents Association

The Applicant's own consultation documentation references engagement with a Firsby residents' group.

Evidence shows that the Firsby Residents Association was included in engagement during 2025, including participation in meetings relating to the development proposals.

However, in 2026, the Association was not included in comparable engagement. Correspondence dated 23 March 2026 confirms that the Association was not invited to participate in subsequent engagement activity. (*Appendix C*)

This inconsistency is material to the assessment of consultation adequacy and indicates a pattern of selective and inconsistent engagement.

Engagement with a residents' association does not satisfy the statutory requirement to consult individual persons with qualifying land interests.

The evidence demonstrates that group engagement has, in practice, been relied upon in place of formal consultation, resulting in qualifying persons not being identified or served notice.

This approach is inconsistent with the requirements of Section 42 and undermines the completeness of the consultation process.

8. Evidence of Engagement Practices (Survey Works & Communications)

The FRA Evidence Pack - Survey Works & Access - Park Lane offers a comprehensive account of site activities and communications before the application process began. It shows that engagement was mostly reactive, issues raised by residents were not addressed through structured or formal consultation mechanisms. (*Appendix E – Email thread Re Survey Works*)

In particular, the evidence shows that:

- No site-specific traffic or access management plan was evidenced
- No documented risk assessments were provided
- Responses relied on developer interpretation without supporting evidence

This pattern is directly relevant to the adequacy of consultation. It demonstrates that engagement with affected parties was not systematically applied and did not reflect the structured and inclusive approach required under Section 42.

These matters do not arise in isolation but form part of a wider pattern of reactive and inconsistent engagement.

Recent Engagement Failure – Exclusion from Targeted Briefing (March 2026)

On 23 March 2026, the Applicant held a webinar described as a briefing for “host parish councils” and “community representatives” to present updated masterplans and design changes following statutory consultation.

Firsby Residents Association (FRA), which represents residents directly affected within the Whitestone 1 (W1) area, was not invited to this session and had no representation at the meeting.

This is of relevance given that FRA had previously attended and participated in earlier engagement meetings during 2025 and had therefore been recognised by the Applicant as a relevant community stakeholder.

This situation arose against the backdrop of a lack of substantive engagement between the Firsby Residents Association (FRA) and Whitestone from January 30, 2026—when correspondence regarding survey works and access was last exchanged—until the email received after the March 23, 2026, webinar.

During this period, ongoing uncertainty persisted regarding access arrangements, specifically the community’s reliance on Park Lane and Firsby Lane, as well as the potential for changes to these access routes.

Consequently, residents were not properly informed, affording a reasonable opportunity to understand the updated design changes relevant to their area. They did not receive clarification on the access strategy and were unable to ask questions in a contemporaneous forum. Additionally, residents were unable to respond to emerging information prior to its submission, limiting their ability to participate meaningfully in the consultation process.

The Applicant subsequently provided presentation materials after the event (25th March thanking us for attending) however this does not substitute for participation in the consultation process.

This matter is relevant to the adequacy of consultation as it demonstrates:

- Selective engagement with certain community representatives
- Inconsistent engagement with a previously recognised stakeholder group
- Failure to include a directly affected community with no alternative representation
- Lack of timely and proportionate engagement on matters central to the impacts of the Proposed Development

In the context of a small hamlet with shared access constraints and qualifying land interests, this exclusion has a materially greater impact than it would in a larger settlement.

9. Residents’ Experience of Engagement and Inconsistency of Engagement.

Residents within Firsby have made repeated attempts to engage with the Applicant on site-specific impacts since October 2025, including requests for a site visit to discuss matters such as equestrian safety, access and viewpoints not readily apparent from plans.

While an initial offer of a site visit was made by the Applicant in October 2025, this was not followed through, and no alternative opportunity was provided prior to the close of consultation.

The Applicant has confirmed by email that no requirement exists to conduct on-site meetings; however, in the context of a small rural hamlet with site-specific constraints, the absence of such engagement has limited the ability of affected residents to fully explain and evidence localised impacts. (*Appendix D – Email thread requesting site visit Oct 29, 2025, to March 31 2026*)

This is particularly relevant where impacts relate to land use, access, and safety considerations that cannot be fully understood through standard consultation materials alone.

In addition, residents have observed that direct engagement has taken place with certain individuals in relation to land interests and agreements, while others with site-specific concerns have not received equivalent engagement or responses to correspondence.

This variation in approach indicates inconsistent engagement across affected persons with qualifying interests.

Other residents received no substantive response to correspondence and were not engaged during the consultation process. One resident who is classed as **vulnerable** has been unable to view any material, there was no answer on the phone number provided by the applicant, and he had to rely on a neighbour to assist in typing and drafting his letter for limited feedback. Evidence indicates that some residents with qualifying interests were not identified or engaged during the consultation process.

Evidence identifies a resident with a qualifying interest in land who is vulnerable due to health and personal circumstances and who was not identified or consulted by the Applicant.

No evidence has been provided to demonstrate that reasonable steps were taken to identify this individual through the land referencing process or to ensure that consultation was accessible.

In a small and clearly identifiable community, which has been promoted within your own material, this omission is material and indicates a failure to ensure consultation was accessible and proportionate. (Appendix F – Email)

The exclusion of a directly affected and previously recognised stakeholder group from a consultation event presenting updated design information further demonstrates inconsistency in engagement.

In the context of a small and isolated hamlet with no formal representation other than a parish meeting, this exclusion materially limited the ability of affected persons to understand and respond to evolving proposals prior to submission.

Materiality of Firsby Evidence

The failures identified within Firsby are not isolated incidents but arise within a small, clearly defined and geographically contained hamlet.

Given the limited number of properties and the shared infrastructure, the omission of multiple qualifying land interests within this area cannot reasonably be attributed to oversight.

Instead, the evidence indicates a broader deficiency in the Applicant's land referencing and consultation processes.

As such, the issues identified within Firsby are indicative of a wider and systemic failure in the identification and consultation of affected persons.

Accessible Consultation Materials

This issue is presented as supporting evidence of wider consultation deficiencies, rather than the primary basis of the Section 42 failure.

Evidence demonstrates that a directly affected consultee with impaired vision requested consultation materials in a format that would enable effective review during the statutory consultation period

While some documents were provided in printed format, the Applicant declined to provide the full Environmental Statement, citing its length, and instead directed the consultee to online resources or public events.

The request for full documentation was repeated, and evidence indicates that attempts to contact the Applicant by telephone were not consistently successful.

In these circumstances, the consultee was not able to access the full consultation material in a format that enabled meaningful review within the consultation period.

The ability of affected persons to understand and respond to consultation material is a fundamental component of the consultation process. Where a known barrier to access is identified and not addressed, this raises concerns as to whether consultation has been carried out in a manner that enables effective participation.

Opportunity to Participate

Consultation is not limited to the circulation of information but requires that affected persons are given a fair and reasonable opportunity to understand and respond to the proposals.

The evidence demonstrates that, in a number of cases, affected individuals were unable to access information, obtain responses, or engage meaningfully within the consultation period.

In these circumstances, affected persons were not provided with a reasonable opportunity to participate in the consultation process.

Prejudice to Affected Persons

The failures identified above have resulted in material prejudice, including:

- Individuals being unaware of their status as affected persons
- Inability to access or understand consultation materials
- Lack of opportunity to raise or resolve site-specific concerns
- Continued safety and access issues during survey works

As a result, affected persons were unable to participate meaningfully in the consultation process.

10. Community Sensitivity and Isolation

Firsby is a small, geographically isolated hamlet with limited access routes and shared infrastructure. It does not benefit from formal parish council representation and is reliant on direct engagement by the Applicant.

In such circumstances, the accurate identification and formal consultation of individual land interests is of heightened importance, as there is no intermediary mechanism through which consultation can reliably be undertaken.

Where a majority of qualifying land interests within such a community are not identified or consulted, the impact of that failure is proportionately greater than in larger or formally represented settlements.

This context reinforces the significance of the deficiencies identified in the Applicant's consultation process.

11. Applicant's Adequacy of Consultation Position

The Applicant's Adequacy of Consultation Report states that all persons with an interest in land were identified and consulted under Section 42(1)(d).

However, the evidence presented in this submission demonstrates that a number of qualifying land interests within Firsby were not identified or served with a Section 42 notice.

This establishes a clear inconsistency between the Applicant's stated position and the consultation undertaken in practice, calling into question the reliability of the Applicant's conclusions on consultation adequacy.

The Applicant had sufficient knowledge of affected land interests to engage with residents and amend elements of the Proposed Development in response to their concerns. However, this knowledge was not consistently translated into formal statutory consultation.

This inconsistency is further reinforced by the omission of HS2 Ltd, a known institutional land interest with prior engagement.

Engagement with a residents' group or informal interaction with affected persons does not satisfy the statutory requirement to consult individual land interests.

Taken together, this evidence raises serious concerns regarding the completeness and reliability of the Applicant's land referencing exercise.

Consistency with the Applicant's Adequacy of Consultation Report

The Applicant's Adequacy of Consultation Report states that all persons with an interest in land were identified and consulted.

However, the evidence presented in this submission demonstrates that a number of qualifying land interests were not identified or served with notice.

This represents a clear inconsistency between the Applicant's stated position and the consultation undertaken in practice.

In these circumstances, the reliability of the Applicant's conclusions on consultation adequacy is called into question.

12. Conclusion

The evidence presented demonstrates that qualifying land interests were not consistently identified or consulted under Section 42(1)(d) of the Planning Act 2008, and that affected persons were not provided with a fair opportunity to participate in the consultation process.

These are not minor or technical deficiencies. They go to the core of the statutory consultation requirements.

In these circumstances, there are substantive grounds for the council to question whether the Applicant has complied with its statutory duties and whether the application meets the requirements for acceptance.

For the reasons set out above, the Applicant has failed to comply with the requirements of Sections 42 and 47 of the Planning Act 2008.

These failures are substantive and have materially affected the ability of affected persons to engage with the consultation process.

In these circumstances, there are substantive grounds for the Councils to conclude, within their Adequacy of Consultation Representation that the application does not comply with Sections 42 and 47 of the Planning Act 2008 and raises significant concerns relevant to acceptance under Section 55

13. Appendix

- A- HS2 Ltd EIR Responses and Appendix (Ref OI-25-6007)
Annex A / Annex B / Response
- B- HS2 Ltd FOI Responses and Appendix (Ref FOI-25-6159)
Annex A / Response
- C- Email Thread Re Non-Inclusion of Targeted Consultation Meeting on 23.03.2026
- D- Email Thread Requesting Visits Oct 29, 2025, to Mar 31, 2026
- E- Email Thread Re Survey Works Firsby Residents Association
- F- Email to S Sargent Mar 31, 2026, confirming no feedback received and no contact.
- G- Email thread Sept 2025 Re Consultation Materials Request
- H- Redacted Land Registry titles / deeds
- I- Resident statements confirming non-service

A - HS2 Ltd EIR Responses and Appendix (Ref OI-25-6007) Annex A

- 1. Please confirm whether any properties owned by HS2 in South Yorkshire have received correspondence from Whitestone Solar / Green Nation regarding S42 notices (Planning Act 2008).**
- 2. I kindly ask for a list of all properties, including postcodes, in South Yorkshire that have been notified by Whitestone Solar / Green Nation in relation to the above notification.**

No data held.

- 3. I would be grateful if you could provide copies of correspondence (emails, meeting notes, letters) between HS2 and Whitestone Solar / Green Nation for the following periods: 2022, 2023, 2024, and from January 2025 to the current date.**

See Annex B (attached).

- 4. Please provide contact details of the persons responsible for actioning S42 notices in relation to Whitestone Solar / Green Nation on behalf of HS2.**

No data held. HS2 Ltd does not have any persons specifically responsible for this particular correspondence.

- 5. Specifically for properties within the DN12 postcode, I kindly ask you to confirm how many properties HS2 is in possession of.**

There are two HS2-managed properties in the DN12 postcode. However, please note that HS2 does not directly own properties, and instead manages properties on behalf of the Department for Transport.

- 6. Please provide contact details for the persons directly responsible for properties within the DN12 area in relation to planning notices.**

There is a person who is responsible for properties within the DN12 area, but we are withholding their details by virtue of Regulation 13 (personal data).

- 7. I would appreciate contact details for persons responsible for any listed buildings, particularly those with heritage value such as Grade 2 listed buildings.**

No data held. HS2 Ltd does not have any persons specifically responsible for this particular type of building.

- 8. I request any correspondence—in relation to Whitestone Solar / Green Nation—including searches that showed the planning of solar farms or renewable energy projects during the purchase of the listed property The Threshing Barn, Firsby Lane, Conisbrough, Doncaster, DN12 2BB, which was purchased in October / November 2024, after non-statutory consultation had commenced from Whitestone.**

See response to question 3.

A - HS2 Ltd EIR Responses and Appendix (Ref OI-25-6007) Annex B

From: [REDACTED] <[REDACTED]@hs2.org.uk>
Sent: 27 November 2024 09:46
To: [REDACTED] <[REDACTED]@ardent-management.com>
Subject: Re: [EXTERNAL] RE: Safeguarding

[REDACTED].
Yes understand but The discussion with me makes sense to be quite informal, which would be more in line with how much I will likely be able to help.

Where [REDACTED] referenced a safeguarding agreement, if that is what's required then at that point [REDACTED] and others would require a more formal briefing. I can explain more tomorrow.

Thank you

[REDACTED]
Head of Operations, Property Services
HS2 Ltd
[REDACTED]

From: [REDACTED] <[REDACTED]@ardent-management.com>
Sent: Tuesday, November 26, 2024 12:38 pm
To: [REDACTED] <[REDACTED]@hs2.org.uk>
Subject: RE: [EXTERNAL] RE: Safeguarding

Hi,

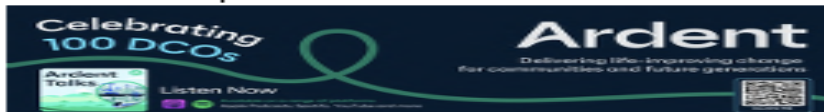
£30 mins should be enough. Thanks.

They wanted to introduce the project; they have done all the other key stakeholder briefings (Councils, etc). It may be useful as an overview but can always ask them to keep it brief and we discuss the interface in more detail? Or can ask we keep it 1-2-1, without the more comprehensive briefing.

Thanks

[REDACTED]

 [REDACTED] MRICS, RICS Expert Witness
[REDACTED]
Mob: [REDACTED]
Tel: [REDACTED]
Email: [REDACTED]@ardent-management.com
Web: www.ardent-management.com
 


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From: [REDACTED] <[REDACTED]@hs2.org.uk>
Sent: 26 November 2024 12:30
To: [REDACTED] <[REDACTED]@ardent-management.com>
Subject: RE: [EXTERNAL] RE: Safeguarding

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Hi [REDACTED].

Yes 10:30 is also ok for Thursday, until 11am latest? Can I ask what you mean though in terms of 'Comms team'? I actually think this will work best if we do just speak 1-1 as I will need to sense check the extent I can add to what [REDACTED] has already told you.

Is it ok if we just have an initial 1-1 chat?

Thanks

[REDACTED] | Head of Operations – Property Services | HS2 Ltd

Tel: [REDACTED] | [REDACTED]@hs2.org.uk | Facebook | Twitter | LinkedIn | Pronouns:

High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | www.gov.uk/hs2



From: [REDACTED]@ardent-management.com>
Sent: 26 November 2024 10:57
To: [REDACTED]@hs2.org.uk>
Subject: RE: [EXTERNAL] RE: Safeguarding

Hi [REDACTED]

Great to hear from you! I am glad things are well your end; [REDACTED]

Thanks for being available for a call; I can do the Friday slot – any chance the Thursday call could be 10:30? I will need to liaise with the Comms team for their availability before reverting.

Many thanks

[REDACTED]



[REDACTED] MRICS, RICS Expert Witness
[REDACTED]
Mob: [REDACTED]
Tel: [REDACTED]
Email: [REDACTED]@ardent-management.com
Web: www.ardent-management.com



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From: [REDACTED]@hs2.org.uk>
Sent: 26 November 2024 09:33
To: [REDACTED]@ardent-management.com>
Subject: Re: [EXTERNAL] RE: Safeguarding

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[REDACTED]

I'm well thank you; yes running Safeguarding and various other things now; but still here.....!

Happy to speak, this week quite tight. Is Friday 9.30 any good?
Or Thursday 10am?
MS teams call?

Best wishes,

Head of Operations, Property Services
HS2 Ltd

From: [REDACTED]@ardent-management.com>
Sent: Monday, November 25, 2024 3:40:06 PM
To: [REDACTED]@hs2.org.uk>; [REDACTED]@hs2.org.uk>
Cc: [REDACTED]@hs2.org.uk>
Subject: RE: [EXTERNAL] RE: Safeguarding

Many thanks for getting back to me.

@ [REDACTED] - I hope you are well? What is your availability like for an initial call this week?

Many thanks,

[REDACTED]



[REDACTED] MRICS, RICS Expert Witness

Mob: [REDACTED]

Tel: [REDACTED]

Email: [REDACTED]@ardent-management.com

Web: www.ardent-management.com



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From: [REDACTED]@ardent-management.com>
Sent: 28 November 2024 12:24
To: [REDACTED]@hs2.org.uk>; [REDACTED]@hs2.org.uk>
Cc: [REDACTED]@hs2.org.uk>; [REDACTED]@ardent-management.com>
Subject: RE: [EXTERNAL] RE: Safeguarding

Many thanks for confirming [REDACTED]

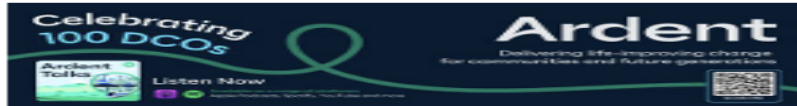
Kris

[REDACTED]



[REDACTED] MRICS, RICS Expert Witness

Mob: [REDACTED]
Tel: [REDACTED]
Email: [REDACTED]@ardent-management.com
Web: www.ardent-management.com



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From: [REDACTED]@hs2.org.uk>
Sent: 28 November 2024 12:12

To: [REDACTED]@hs2.org.uk>; [REDACTED]@ardent-management.com>
Cc: [REDACTED]@hs2.org.uk>
Subject: RE: [EXTERNAL] RE: Safeguarding

External e-mail - Please think before clicking any links or opening attachments.

Thanks [REDACTED]

@ [REDACTED] our helpdesk received an enquiry from Whitestone. I replied to [REDACTED] @ Whitestone yesterday offering a meeting to discuss.

Kind Regards

[REDACTED]

From: [REDACTED]@hs2.org.uk>
Sent: 28 November 2024 11:35
To: [REDACTED]@ardent-management.com>
Cc: [REDACTED]@hs2.org.uk>; [REDACTED]@hs2.org.uk>
Subject: RE: [EXTERNAL] RE: Safeguarding

Dear [REDACTED]

Further to our conversation, here is the government line to take on Safeguarding in relation to Phase 2 of HS2.

- The Government will thoroughly review the position (on HS2) they have inherited before setting out more detailed plans in due course, including future plans for HS2 Phase 2b safeguarding

The Government press release on 20 Oct 2024, in addition, included this statement

[Transport Secretary announces urgent action to get a grip on spiralling HS2 costs - GOV.UK](#)

"The government has been clear it is not resurrecting Phase 2 of HS2, which was cancelled under the previous administration."

Hope this is useful to have.

And as discussed it would be [REDACTED] and [REDACTED] copied, who would have a more detailed conversation if there have not been any further updates on Eastern Leg Safeguarding by the point at which you are seeking statutory consultation responses.

[REDACTED] and [REDACTED] the below relates to this: <https://whitestonepartners.com/wp-content/uploads/2024/11/Whitestone-consultation-booklet-final.pdf>

Kind regards

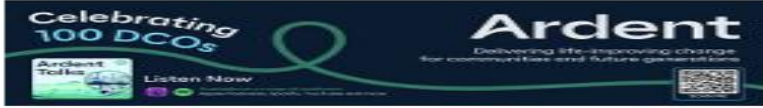
[REDACTED] Head of Operations – Property Services | HS2 Ltd
Tel: [REDACTED] | [REDACTED]@hs2.org.uk | [Facebook](#) | [Twitter](#) | [LinkedIn](#) | Pronouns: [REDACTED]
High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | www.gov.uk/hs2





██████████ MRICS, RICS Expert Witness

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Tel: ██████████
Email: ██████████@arden-management.com
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From: ██████████ <██████████@hs2.org.uk>
Sent: 25 November 2024 15:22
To: ██████████ <██████████@arden-management.com>
Cc: ██████████ <██████████@hs2.org.uk>; ██████████ <██████████@hs2.org.uk>
Subject: RE: [EXTERNAL] RE: Safeguarding

External e-mail - Please think before clicking any links or opening attachments.

█

I did reach out to ██████████ and ██████████ has said ██████████ is happy to have a chat in the first instance, so copied in and can leave it to you to set up something between you.

If a safeguarding agreement is required it will then go to ██████████ and ██████████ to take that forward.

Hope that helps.

Regards

██████████

██████████ BSc (Hons) MRICS | ██████████ | HS2 Ltd
Tel: ██████████

From: ██████████ <██████████@arden-management.com>
Sent: 25 November 2024 14:53
To: ██████████ <██████████@hs2.org.uk>
Subject: [EXTERNAL] RE: Safeguarding

Hi ██████████

Hope you had a good weekend? Didn't manage to catch you at NIPA unfortunately.

Any update on the below – is it ██████████ still, or ██████████ ?

Many thanks

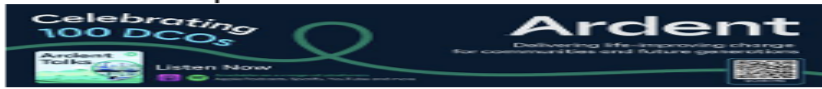
█



██████████ MRICS, RICS Expert Witness

Mob: ██████████

Tel: [REDACTED]
Email: [REDACTED]@ardent-management.com
Web: www.ardent-management.com



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From: [REDACTED]
Sent: 19 November 2024 08:56
To: [REDACTED]@hs2.org.uk
Subject: Safeguarding

Dear [REDACTED]

Thank you for your time the other day. As discussed, I am working on a solar DCO that has just launched its non-statutory consultation. Who would be the best placed to get in touch with to introduce the project and discuss the interface with the Phase 2b safeguarding?

Many thanks,

[REDACTED]



[REDACTED] MRCS, RICS Expert Witness

Mob: [REDACTED]

Tel: [REDACTED]

Email: [REDACTED]@ardent-management.com

Web: www.ardent-management.com



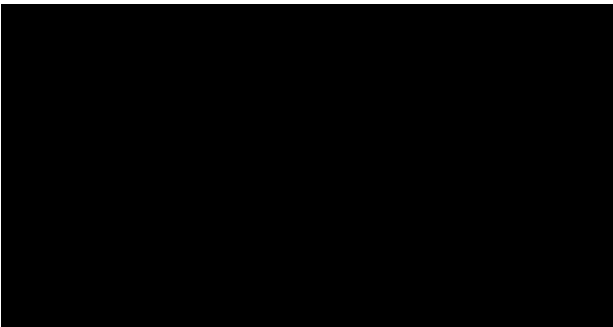
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HS2

High Speed Two (HS2) Limited
Two Snowhill, Snow Hill Queensway
Birmingham B4 6GA

Telephone: 08081 434 434
Minicom: 08081 456 472
Email: hs2enquiries@hs2.org.uk
[gov.uk/hs2](https://www.gov.uk/hs2)

Date as email



Thank you for your information request which was received on 20 September 2025. I have processed your request under the Environmental Information Regulations ('EIR') 2004 ('the Regulations') because the information you have requested concerns work affecting the environment according to the definition in Regulation 2. Section 39 of the Freedom of Information Act ('FOI') 2000 ('the Act') exempts environmental information from the Act but requires us to consider it under the Regulations.

REQUEST

- 1. Please confirm whether any properties owned by HS2 in South Yorkshire have received correspondence from Whitestone Solar / Green Nation regarding S42 notices (Planning Act 2008).**
- 2. I kindly ask for a list of all properties, including postcodes, in South Yorkshire that have been notified by Whitestone Solar / Green Nation in relation to the above notification.**
- 3. I would be grateful if you could provide copies of correspondence (emails, meeting notes, letters) between HS2 and Whitestone Solar / Green Nation for the following periods: 2022, 2023, 2024, and from January 2025 to the current date.**
- 4. Please provide contact details of the persons responsible for actioning S42 notices in relation to Whitestone Solar / Green Nation on behalf of HS2.**
- 5. Specifically for properties within the DN12 postcode, I kindly ask you to confirm how many properties HS2 is in possession of.**
- 6. Please provide contact details for the persons directly responsible for properties within the DN12 area in relation to planning notices.**
- 7. I would appreciate contact details for persons responsible for any listed buildings, particularly those with heritage value such as Grade 2 listed buildings.**
- 8. I request any correspondence—in relation to Whitestone Solar / Green Nation—including searches that showed the planning of solar farms or renewable energy**

projects during the purchase of the listed property The Threshing Barn, Firsby Lane, Conisbrough, Doncaster, DN12 2BB, which was purchased in October / November 2024, after non-statutory consultation had commenced from Whitestone.

RESPONSE

HS2 Ltd holds information relevant to your request. However, while some of the information is attached to this email, I am afraid that I am not required to release all the information requested. I am withholding some of the information by virtue of **Regulation 13 - Personal information**.

Please see **Annex A** attached for our response to your request.

Please also find a redacted document attached as **Annex B** with answers specifically to question 3.

Regulation 13 - Personal Information

Regulation 13 provides that information relating to third parties is exempt information, if among other things, the release of the information requested would breach the requirements contained under the first data protection principle. In this case release of the information would not be lawful or fair.

There is a wider legitimate interest for transparency but placing this information in the public domain would lead to an unwarranted level of interference with the person's privacy. It is not needed for us to consider the necessity for disclosure and, in this case, there is no pressing need for us to disclose the information. Therefore, a further balancing test is not required.

Further information on Regulation 13 is available via the following link:

<https://www.legislation.gov.uk/ukxi/2004/3391/regulation/13/made>

Regulation 12(4)(a) - No information

Where we have stated that we do not hold the information we are relying on EIR exception 12(4)(a) which is subject to a public interest test. However, the Information Commissioner's Office recognises that it can be impossible to do a meaningful public interest test (PIT) if the information is not held. As such, a PIT has not been carried out. The following link sets out regulation 12(4)(a) in full:

<http://www.legislation.gov.uk/ukxi/2004/3391/regulation/12/made>

Right to Review

If you are unhappy with the way we have handled your request or with the decisions made in relation to your request, you may complain in writing to HS2 Ltd. Please find below details of

HS2 Ltd's complaints procedure which includes your right to complain to the Information Commissioner. Please remember to quote reference number **FOI-25-6007** in any future communication relating to this request.

Yours sincerely,

Briefings, Correspondence and FOI Adviser
High Speed Two (HS2) Limited

HS2 Ltd FOI Responses and Appendix (Ref FOI-25-6159) Annex A / Response

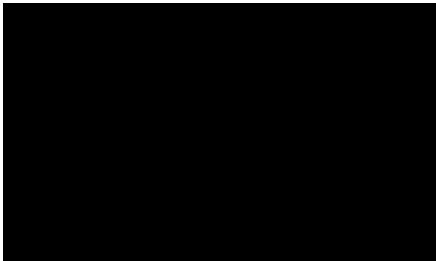
(Annex A is repeat of FOI -25 6007)

HS2

High Speed Two (HS2) Limited
Two Snowhill, Snow Hill Queensway
Birmingham B4 6GA

Telephone: 08081 434 434
Minicom: 08081 456 472
Email: hs2enquiries@hs2.org.uk
gov.uk/hs2

Date as email



FOI-26-6159

Thank you for your information request which was received on 13 February 2026. I have processed your request under the Environmental Information Regulations ('EIR') 2004 ('the Regulations') because the information you have requested concerns work affecting the environment according to the definition in Regulation 2. Section 39 of the Freedom of Information Act ('FOI') 2000 ('the Act') exempts environmental information from the Act but requires us to consider it under the Regulations.

RESPONSE

Please find our response below. For ease of reference, I address each of your questions in turn.

- 1. Whether HS2 Ltd has been formally identified and consulted as a statutory consultee under Section 42 of the Planning Act 2008 in relation to the proposed Whitestone Solar Farm Development Consent Order (EN0110020).***

HS2 Ltd is not identified as a statutory consultee under the Planning Act 2008 due to significant changes regarding HS2 safeguarding which took place in 2025.

On the 17 July 2025, the Secretary of State for Transport, Heidi Alexander made a statement in Parliament lifting Safeguarding Directions and Discretionary Property Schemes for the former Phase 2b Eastern Leg between the West Midlands and Leeds.

The announcement was made as part of a wider publication of a six-monthly report on HS2 by the Secretary of State. Please see the below link for the full HS2 six-monthly report to Parliament: July 2025:

<https://www.gov.uk/government/speeches/hs2-6-monthly-report-to-parliament-july-2025>.

2. Whether HS2 Ltd received any Section 42 consultation letter or associated consultation documents from Whitestone Net Zero Ltd.

HS2 Ltd have not received a Section 42 consultation letter or associated consultation documents from Whitestone Net Zero Ltd.

3. Whether HS2 Ltd has had any engagement with Whitestone Net Zero Ltd in relation to residential properties in Firsby associated with HS2 land ownership.

Please provide copies of any correspondence where applicable.

HS2 Ltd holds information relevant to your request. However, while the majority of the information is attached to this email within **FOI-25-6007 – Annex A**, I am afraid that I am not required to release all the information requested. The redacted information is being withheld by virtue of **Regulation 13 - Personal information**.

Nothing in this response should be taken as meaning any personal information with respect to any specific individual is or is not held by HS2 Ltd.

Regulation 13 - Personal information

Regulation 13 provides that information relating to third parties is exempt information, if among other things, the release of the information requested would breach the requirements contained under the first data protection principle. In this case release of the information would not be lawful or fair.

There is a wider legitimate interest for transparency but placing this information in the public domain would lead to an unwarranted level of interference with the person's privacy. It is not needed for us to consider the necessity for disclosure, and, in this case, there is no pressing need for us to disclose the information. Therefore, a further balancing test is not required.

Further information on Regulation 13 is available via the following link:


<https://www.legislation.gov.uk/uksi/2004/3391/regulation/13/made>

Right to Review

If you are unhappy with the way we have handled your request or with the decisions made in relation to your request, you may complain in writing to HS2 Ltd. Please find below details of HS2 Ltd's complaints procedure which includes your right to complain to the Information Commissioner.

Please remember to quote reference number **FOI-26-6159** in any future communication relating to this request.

C Email Thread Re Non-Inclusion of Targeted Consultation Meeting on 23.03.2026

 Outlook

Re: RE: RE: Whitestone Solar Farm Parish Council Update Meeting

From Firsby Residents Association [REDACTED]
Date Tue 31/03/2026 22:29
To Whitestone Solar Farm <info@whitstonesolarfarm.co.uk>

[REDACTED]

Dear Emily,

Thank you for your response and for providing further detail regarding the recent community briefing and access arrangements.

We note your confirmation that the session held on 23 March 2026 was arranged via host parish councils. However, residents have indicated that access to the session was circulated informally shortly before it commenced, and that individuals outside of the original invite list were able to attend.

In this context, it remains unclear how participation in the session was determined, and whether a consistent and transparent approach to engagement has been applied across all affected communities, particularly those directly impacted within the Firsby hamlet.

We also note your statement that construction traffic would not utilise bridleways or Park Lane, and that access to Whitestone 1 is intended to be taken from the A630 with internal routing thereafter. This clarification is helpful.

However, residents have observed that recent survey activity has already utilised Park Lane bridleway for access, resulting in obstruction and safety concerns for users. This gives rise to some uncertainty as to how access will be managed in practice, and how it is intended to operate during construction.

Given that access arrangements are a primary determinant of environmental, safety and community impact for Firsby residents, we would be grateful if you could clarify:

1. Whether the use of Park Lane during survey works reflects the intended construction access strategy, or whether this was temporary and will not form part of the final approach
2. When the updated access plan (including the A630 access point and internal routing) will be made available to consultees
3. Whether any further opportunity will be provided for residents to review and comment on access arrangements once this information is published

We also note your statement that there are no changes near Firsby. Given the proximity of retained land parcels and the introduction of the cable corridor within the surrounding landscape, it would be helpful to understand how this position has been reached and whether these elements are considered to have no material impact on the Firsby hamlet.

We remain keen to engage constructively and would welcome clarification on the above points to ensure that residents are able to understand and respond to the proposals on an informed basis.

We look forward to your response.

Kind regards


----- Original Message -----

On Tuesday, 03/31/26 at 15:44 Whitestone Solar Farm <info@whitestonesolarfarm.co.uk> wrote:

Hello,

Thank you for your email.

I can confirm that the meeting was for all of the host parish councils. We contacted their clerks, and they determined who would attend from the council. I can confirm that Hooten Roberts was in attendance, and I do believe that someone from Firsby attended as well. This is certainly not meant as a way to exclude anyone – we have held a number of meetings with the parish councils, as well as ward councillors, MPs and other stakeholders throughout the project's development.

This was the same information that we had released in the community newsletter to explain how the project had been updated in response to feedback, and the next steps. Some of the parish councils are also consultees for the targeted consultation, depending on if any of the proposed changes are in their boundaries. I can confirm that there are no changes near Firsby.

Yes, there was a question around access for Whitestone 1. The full response is copied below.

We do not anticipate any further consultation; however, we may have further updates for the parish councils, we can include you in those going forward.

Kind regards



During the second consultation we presented two potential access points for Whitestone 1 – one on the A630 to access most of this portion of the project, and a second off of Common Lane south of Clifton. In response to feedback from the consultation, we have

removed the fields that were south of Clifton from the project, so that access point is no longer needed. Access to Whitestone 1 will now be solely through an access point on the A630. We are aware of the housing development that has been consented north of the A630 and are consulting with the local authority and National Highways about how to best mitigate potential cumulative traffic impacts by selecting a suitable location for this access point along the road. Once construction traffic enters the proposed development, it would travel along internal tracks to access the other locations throughout Whitestone 1. Construction traffic would not use the bridleways, other public rights of way, or Park Lane, however there will be controlled crossings, with an approach to management outlined when the DCO is submitted. The updated access plan showing the access points and internal tracks is being finalised now and will be available for release when ready.

From: Firsby Residents Association

Sent: 26 March 2026 16:32

To: Whitestone Solar Farm <info@whitestonesolarfarm.co.uk>

Subject: Re: RE: Whitestone Solar Farm Parish Council Update Meeting

Dear [REDACTED]

Thank you for your email.

We note that this is the first correspondence received from Whitestone to our association since your detailed response of 30 January 2026, which addressed survey works and access arrangements, including reliance on permitted development rights.

The absence of any intervening engagement is relevant in the context of the consultation process, particularly given that matters relating to access, safety and land interests remain central to the potential impacts on Firsby residents.

Against that context, Firsby Residents Association (FRA) was not invited to the 23 March webinar and therefore had no representation at the meeting. FRA represents residents directly affected within the Whitestone 1 (W1) area, including those with land interests and access rights reliant on Firsby Lane (bridleway).

Could you please confirm:

1. Whether FRA was intentionally excluded from the invitation list, or whether this was an oversight
2. The criteria used to determine which "community representatives" were invited to the session
3. Whether any matters specifically relating to Firsby were discussed during the webinar

As you will be aware, Firsby comprises a small number of residential properties all reliant on a single access route via Firsby Lane, which is a recorded bridleway and forms part of residents' legal access arrangements.

In this context, access is not a secondary matter but a primary determinant of environmental, safety and community impact, and is fundamental to the ability of affected persons to understand and respond to the proposals.

We would therefore appreciate clarification on the following:

4. Whether any changes to access arrangements were presented around the red line border, including the apparent removal or alteration of access via Edlington Lane
5. Whether Park Lane / Firsby Lane (bridleway) continues to be relied upon as a primary or sole access route
6. Whether any discussion took place regarding traffic management, construction access, or impacts on Public Rights of Way

The ability of affected persons to participate meaningfully in consultation depends on clear and timely provision of information on matters such as access strategy and associated impacts.


In the absence of FRA representation at this session, and given the lack of prior engagement since January, it is not clear that residents have been provided with a reasonable opportunity to understand and respond to these matters.

We would therefore request:

7. Confirmation of how FRA and directly affected residents will be included in future engagement
8. Clarification on whether further targeted consultation will take place in relation to access arrangements and any changes to the scheme

We look forward to your response.

Kind regards,



Firsby Residents Association



Original Message with the thread FRA were not included on

----- Original Message -----

On Wednesday, 03/25/26 at 16:52 Whitestone Solar Farm

<info@whitestonesolarfarm.co.uk> wrote:

Hello,

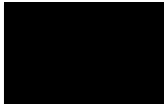


Thank you again to everyone who was able to join us on Monday. For anyone who wasn't able to join, I'm attaching the slides. All of the maps are also on the website.

As the representatives of your community, we really appreciate you engaging with us to help share information with local communities. Similarly, if you are aware of any emerging issues or concerns, we appreciate you letting us know so that we can try to address them. It's clear that there is significant interest in the traffic access and management strategy, so we're looking to pull those documents out for early publication. I'll let you know as soon as we have them to share.

We are not currently planning any more in person meetings but may have more on-line sessions as we get closer to submission. Please let me know if you think that would be helpful, or if there are other things we could do.

Warm regards,

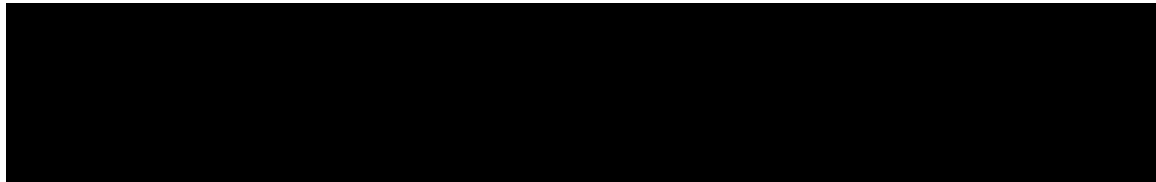


From: Whitestone Solar Farm
Sent: 19 March 2026 17:28
To: Whitestone Solar Farm <info@whitstonesolarfarm.co.uk>
Subject: RE: Whitestone Solar Farm Parish Council Update Meeting

Hello,

This is just a reminder about the webinar next Monday. Do please register in advance to attend. We hope to see you there.

Kind regards



From: Whitestone Solar Farm
Sent: 09 March 2026 16:28
To: Whitestone Solar Farm <info@whitstonesolarfarm.co.uk>
Subject: Whitestone Solar Farm Parish Council Update Meeting

Dear Sir/Madam,

We are writing to invite you to a virtual webinar about our updated masterplans for Whitestone Solar Farm.

The meeting will take place via Zoom on:

Date: Monday 23 March 2026
Time: 6:00pm – 7:00pm
Location: [Zoom](#)

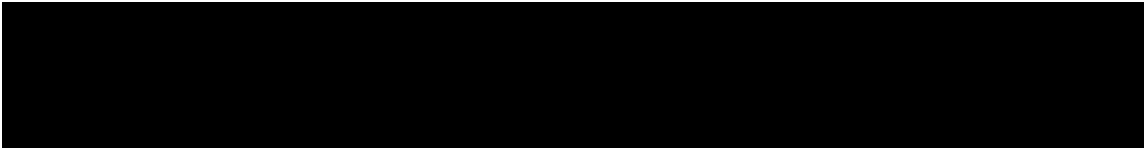
This session is for host parish councils of the proposed solar farm and will provide an overview of the updated proposals. This includes changes made in response to feedback from the second consultation which took place from September to October 2025. We received more than 10,000 pieces of written feedback through our paper and online questionnaire, as well as through email and post. We have now reviewed all of the feedback, and along with the environmental and technical assessments, this has informed our updated design, which has resulted in a 37% reduction in the developable area since the initial proposals.

During the session we will show the updated masterplans and explain where the changes have been made, as well as discussing the next steps for the project. There will be an opportunity to ask questions during the session.

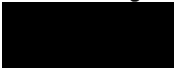
Please do let us know if members of the parish council are able to attend the briefing by replying to this email. If you are unable to attend, we are happy to answer any questions you may have over email at info@whitestonesolarfarm.co.uk or over the phone on 0800 688 9936.

Please find the link to register for the online meeting [here](#).

We look forward to speaking with you soon.



Kind regards,



Community Relations



D - Email Thread Requesting Visits Oct 29, 2025, to Mar 31, 2026

 Outlook

RE: Whitestone Site Visit to Firsby (W1)

From Whitestone Solar Farm <info@whitstonesolarfarm.co.uk>

Date Tue 31/03/2026 15:23



Hello,

Hope you are well. I apologise for our slow response.

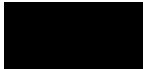
I want to clarify that there are a number of different reasons that individuals can be identified as s42(1)d consultees. This means that a person has been identified as a land interest under any of the following categories: landowners, lessees, tenants or occupiers (Category 1 persons, as per s44(1)); those with an interest in the land or certain powers with respect to the land (Category 2 persons, s44(2)); and those who the Applicant thinks would or might be entitled to make a relevant claim under s44(4) (Category 3 persons). Once we have identified these individuals, we are required to send a notice to them about the consultation and how to take part. This is the letter you will have received ahead of the statutory consultation last autumn.

There are no requirements to conduct on site meetings with consultees. As a courtesy, we did offer to meet with individuals who live near the project boundary, but I understand that the day Jonathan was available did not work for you, so he was unable to reschedule before the end of the consultation period. We did receive your feedback and were able to make changes around Firsby in response to your feedback specifically. We have removed the field to the north of the Firsby, and removed both it and the other field to its west entirely from the project.

We received considerable feedback from our two rounds of consultation on the project. We do not anticipate any further consultation taking place. The other meetings that you referred to are for a different set of land interests. For those who are on the cable route, we have reached out because we need to agree Heads of Terms for the project to cross their land. Those conversations are underway.

I hope this helps clarify, and do please let us know if you have any further questions.

Kind regards



[REDACTED]
From: A [REDACTED]
Sent: 26 March 2026 17:58
To: Whitestone Solar Farm <info@whitestonesolarfarm.co.uk>

[REDACTED]
Subject: Fw: Whitestone Site Visit to Firsby (W1)

Dear [REDACTED]
[REDACTED]

I am writing to follow up on our email of **11 February 2026**, to which we have not yet received a response.

For clarity, this matter has been ongoing since **October 2025**, when [REDACTED] offered to attend our property to discuss the feedback we had submitted. This was suggested specifically because our property has a different aspect and therefore site-specific considerations.

We responded promptly at the time and later provided our availability in January 2026 in good faith. The intention was to discuss matters in situ, including safe horse riding and exercise during the construction phase, potential provision of a suitable schooling area, and the impact on viewpoints that are not readily apparent from standard plans. However, the visit did not take place and we were subsequently informed that site visits were no longer being undertaken.

Since sending our last email, we have also been made aware that Whitestone representatives have been in contact with other residents regarding potential land arrangements. This appears inconsistent with the position that no further direct engagement is currently taking place, and we are therefore unclear as to how our own site-specific concerns are being considered.

As a Section 42 consultee, we had understood that the original site visit formed part of the engagement process to ensure our particular circumstances were properly assessed. In particular, matters such as maintaining safe and practical equestrian use of the land during construction require a detailed, site-specific understanding.

We remain willing to engage constructively with the process; however, given the lack of response to our previous correspondence, we currently feel somewhat isolated from it. For transparency, and in the hope of facilitating constructive dialogue, I have copied our Member of Parliament into this email.

Could you please confirm:

1. That our correspondence of 11 February 2026 has been received and when we might expect a response;
2. How Whitestone is currently assessing site-specific impacts, including equestrian use, in the absence of on-site engagement; and
3. Whether there will be an opportunity for direct, property-specific discussion prior to submission of the DCO.

We look forward to your clarification.

Kind regards
[REDACTED]

[REDACTED]
Sent: Monday, March 09, 2026 20:23

To: Whitestone Solar Farm <info@whitstonesolarfarm.co.uk>

Subject: Fw: Site Visit to Firsby

[REDACTED]

Dear Becca,

I am writing to follow up on our email of 11 February 2026, to which we have not yet received a response.

For clarity, this matter has been ongoing since October 2025, when [REDACTED] offered to attend our property to discuss the feedback we had submitted. This was suggested specifically because our property has a different aspect and therefore site-specific considerations.

We responded promptly at the time and later provided our availability in January 2026 in good faith, with the intention of discussing concerns such as safe horse exercise routes and viewpoints that may be affected by the proposed solar arrays. However, the visit did not take place and we were subsequently informed that site visits were no longer being undertaken.

Since sending our last email we have also been made aware that Whitestone representatives have been in contact with other residents regarding potential land arrangements. This appears inconsistent with the position that no further direct engagement is currently taking place, and we are therefore unclear as to how our own site-specific concerns are being considered.

As a Section 42 consultee, we had understood that the original site visit formed part of the engagement process to ensure our particular circumstances were properly assessed. At present we have not received clarification on how this will now occur.

We remain willing to engage constructively with the process; however, given the lack of response to our previous correspondence, we currently feel somewhat isolated from it. For transparency, and in the hope of facilitating constructive dialogue, I have copied our Member of Parliament into this email.

Could you please confirm:

- That our correspondence of 11 February 2026 has been received and when we might expect a response;
- How Whitestone is currently engaging with Section 42 consultees whose properties have site-specific considerations; and
- Whether there will be an opportunity for direct engagement prior to submission of the DCO.

We look forward to your clarification.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: Wednesday, February 11, 2026 17:09
To: Whitestone Solar Farm <info@whitstonesolarfarm.co.uk>
Subject: Re: Site Visit to Firsby

Good afternoon Becca,

Thank you for your email it is appreciated.

As you are aware, we are a Section 42 consultee in relation to the proposed development. Given this status, and the acknowledgement in October that our property has a distinct aspect requiring site-specific consideration, we understood the proposed visit to be part of ensuring our circumstances were properly assessed.

We provided availability in January in good faith, with the intention of discussing matters such as **safe horse riding areas** / exercise routes and viewpoint / visual impacts that are not readily apparent from standard plans due to the topography of the land parcels.

We were therefore concerned to learn that site visits are no longer being undertaken, without explanation as to how property-specific impacts are now being evaluated in their absence.

To ensure clarity, could you please confirm:

- **How our site-specific concerns are being assessed without an on-site review.**
- **What opportunity will be provided for direct engagement before submission of the DCO.**

We remain willing to engage constructively in this matter and would appreciate reassurance that our statutory consultation rights are being meaningfully fulfilled.

[REDACTED]

From: Whitestone Solar Farm <info@whitstonesolarfarm.co.uk>

Sent: Wednesday, February 11, 2026 15:45

Subject: RE: Site Visit to Firsby

Thank you for your email.

Apologies that you weren't able to make the date we offered and we unfortunately were only able to do site visits at that time.

In terms of next steps, we have a community newsletter coming out soon, which will show the changes made to the masterplans based on the second consultation. We received all your feedback from the consultation and have taken this into account whilst drawing up the updated masterplans.

This update will be coming shortly.

Thanks,

Community Relations

F [REDACTED]

Sent: 27 January 2026 23:44

To: Whitestone Solar Farm <info@whitstonesolarfarm.co.uk>

Subject: Site Visit to Firsby

Good Morning [REDACTED]

Thank you for your email dated Friday, 23rd January.

I am seeking clarification on the current process, as the correspondence to date appears inconsistent.

Feedback had already been submitted prior to your email of 29th October 2025, in which you proposed a site visit by [REDACTED] specifically to our property due to its unique aspect.

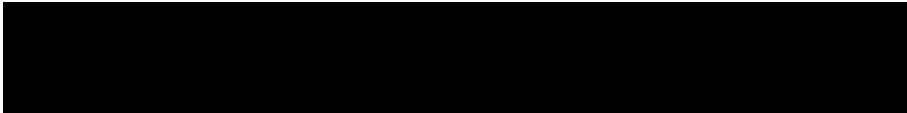
Given that our feedback was already on record, we understood the purpose of that visit was to discuss specific concerns in situ—notably the provision for safe horse riding/exercise and the impact on viewpoints potentially overlooked by the proposed solar arrays. This is why we made several attempts to arrange mutually convenient dates well in advance of the statutory consultation.

To help us understand the change in direction, could you please clarify:

- **The Original Intent:** What was the specific purpose of the proposed site visit if not to discuss the feedback already provided?
- **The Change in Plans:** What is the reason for postponing this meeting, and who made the decision to alter the engagement strategy at this stage?
- **Future Engagement:** Will a site-specific discussion now form part of the next stage when updated plans are shared in the spring?

We have been keen to engage constructively throughout this process and would welcome the opportunity to better understand how our specific concerns are being considered.

Kind regards
[REDACTED]



Sent: 22 January 2026 12:14 PM

To: Whitestone Solar Farm <info@whitestonesolarfarm.co.uk>

Subject: Fw: Site Visit to Firsby

Importance: High

Good Morning,

Following my emails, the most recent being on 12th January 2026, where I provided a broad timeframe for contact, I have not received a response. I will assume from this lack of communication that you are no longer interested in meeting with us.

Best regards,



From: [REDACTED]
Sent: Monday, January 12, 2026 8:41 am
To: Whitestone Solar Farm <info@whitestonesolarfarm.co.uk>
Subject: Re: Site Visit to Firsby

Good Morning,

We are available from the 15th to the 23rd January 2026 with the exception of the 19th.

[REDACTED]

Many thanks

[REDACTED]

From: Whitestone Solar Farm <info@whitestonesolarfarm.co.uk>

Sent: Wednesday, October 29, 2025 1:56:42 PM

Subject: RE: Site visit to Finsby

Thank you for getting back so quickly.

I will look to get back to you with alternative dates when [REDACTED] back up. Conscious that you work shifts, do you have dates or times that work best for you at all?

Thanks,

Community Relations

 A logo for a solar farm Description automatically generated

Website: www.whitestonesolarfarm.co.uk

Phone: 0800 688 9936

Email: info@whitestonesolarfarm.co.uk

Write to: Whitestone Solar Farm, Freepost SEC Newgate UK Local

From: [REDACTED]
Sent: 29 October 2025 14:45
To: Whitestone Solar Farm <info@whitestonesolarfarm.co.uk>
Subject: Re: Site Visit to Firsby

Good Afternoon [REDACTED]

Unfortunately, I am working on this date, do you want to send a couple of alternate dates so I can check my shift pattern.

[REDACTED]

Many thanks

[REDACTED]

From: Whitestone Solar Farm <info@whitestonesolarfarm.co.uk>
Sent: Wednesday, October 29, 2025 2:19:29 PM
[REDACTED]
Subject: Site Visit to Firsby

[REDACTED]

Thank you for your feedback that you have sent in.

I know previously you have emailed about a site visit specifically to your property, due to the aspect being different. Would you be available on Friday for [REDACTED] to make a visit to your property? If this is the case, would there be a time that would work for you?

Thanks,

[REDACTED]

Community Relations

E - Email Thread Re Survey Works Firsby Residents Association.

From Whitestone Solar Farm to FRA January 26th 2026

Hello,

You may have seen that we are currently doing surveys in Whitestone 1. These surveys are part of our Environmental Impact Assessment to help identify potential heritage assets, so that we can best protect and preserve them. They include a JCB to dig trial trenches, which will then be backfilled and returned to their original state. The survey areas include temporary fences and cameras in order to keep the team and equipment left in position safe, they are not to record anything else. These surveys should be complete by mid February, but you may see other members of our team on site doing other surveys as we work to complete the environmental assessments this spring.

Please let me know if you have any questions,

Kind regards

██████

(BCC to parish councils, Conisbrough ward members and John Healey's office)

Community Relations

Website: www.whitstonesolarfarm.co.uk

Phone: 0800 688 9936

Email: info@whitstonesolarfarm.co.uk

Write to: Whitestone Solar Farm, Freepost SEC Newgate UK Local

From FRA to Whitestone Solar Farm January 26th 2026

Dear ██████

Thank you for your email explaining the nature of the current survey works.

While the purpose of the archaeological and environmental surveys is understood, there remains a lack of clarity regarding the planning and access basis for the operational setup currently in place at Conisbrough Parks.

In particular, it would be helpful if you could clarify the following:

1. Planning status - What lawful planning basis authorises the siting and use of welfare/office cabins,

fencing, CCTV and plant on agricultural Green Belt land, where that use is not

agricultural? - Has any temporary planning consent, prior notification, or agreement with the Local

Planning Authority been obtained?

2. Change of use - How Whitestone considers the land's current use as an operational compound for

private commercial survey works does not constitute a material change of use under

section 55 of the Town and Country Planning Act 1990?

3. Access and safety - What site-specific risk assessment or access management plan governs the use of

Park Lane public bridleway for vehicle access, plant delivery and welfare facilities,

particularly given its blind bends and regular equestrian use? - What mitigation measures are in place to protect bridleway users during these works?

4. Duration and scope - How long the compound, welfare facilities and associated equipment will remain in

situ, and whether further vehicle movements are anticipated beyond mid-February.

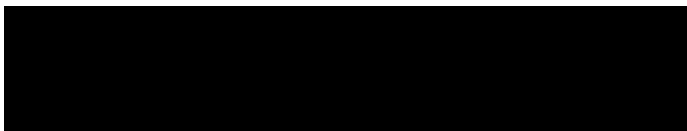
As you will appreciate, the fact that works are described as "temporary" or as part of EIA

preparation does not, in itself, remove the need for planning control or appropriate

highway and public safety safeguards.

I look forward to your clarification.

Kind regards,



From Whitestone Solar Farm to FRA January 30th 2026

Hello,

Thank you for email. Please find our detailed response below.

We are currently on-site in Whitestone 1 to complete trial trenching surveys, which are an important part of the Environmental Impact Assessment to identify heritage assets so that we

may best protect them. These works are underway on private land, which has been agreed with the landowner which is the lawful basis for entry. The surveys include a JCB to dig trenches, which will then be backfilled and restored to their original state. In order to secure the equipment and support the project team, the site also includes fencing, cctv, and a welfare

cabin. We do not consider that we need planning permission for these items, as they fall into

the definition of permitted development pursuant to Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015, and will be removed in less than 28 days. Because these are temporary works and the land will be restored, it is not considered a material change under section 55 of the Town and Country Planning Act 1990.

The works began on 20 January and were scheduled to be complete by 6 February, however, due to the weather, they may be forced to delay. Regardless, the total time spent undertaking

surveys at this site will not exceed 28 days.

We appreciate that there is significant public interest in the project, which has been conveyed

through consultation feedback. We want to reiterate that the surveyors on site are doing their

jobs as part of the environmental impact assessment process to help us design the project in a

way that is sensitive to the environment. Threatening our team will not be tolerated. We ask you to please encourage the community to engage with the project team with respect.

Below sets out the legal rationale to the questions you have raised:

Planning status - What lawful planning basis authorises the siting and use of welfare/office cabins, fencing, CCTV and plant on agricultural Green Belt land, where that use is not agricultural?

Lawful basis for survey and investigations

As regards the underlying lawful basis for entry onto the land to undertake temporary surveying works, an access licence has been agreed between the Applicant and the landowner. This licence is a private agreement authorising the Applicant to complete the relevant surveys.

Lawful basis for siting and use of welfare/office cabins, fencing, CCTV and plant

We consider that the siting and use of the welfare/office cabins, fencing, CCTV and plant on a temporary basis fall within the definition of permitted development pursuant to Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO). The fact that the elements required in connection with the trenching listed above are being used and sited on agricultural land or Green Belt land does not modify the application of the GPDO.

Rationale

Article 3 of the GDPO provides that planning permission is granted for certain classes of development described as permitted development in Schedule 2 to that Order, and that such planning permission is subject to any exceptions, limitations or conditions specified in that Schedule.

(i)

Welfare/office cabins

- Part 4 of Schedule 2 GPDO lists as permitted development Class A - temporary buildings and uses, involving:

The provision on land of buildings, moveable structures, works, plant or machinery required temporarily in connection with and for the duration of operations being or to be carried out

on, in, under or over that land or on land adjoining that land.

- The circumstances whereby Class A is not permitted development are where either the operations in question are mining operations or if planning permission is required for the operations but has not been granted or deemed granted.

o Article 2 (interpretation) GDPO defines “mining operations” as “the winning and working of minerals in, on or under land, whether by surface or underground working. Section 55(4) of the Town and Country Planning Act 1990 (TCPA) provides that for the purposes of that Act, mining operations include the removal of different types of materials (e.g. fuel ash or clinker) from deposits, slags or a disused railway embankment. This is not applicable to trial trenching.

o Section 57(1) of the Town and Country Planning Act 1990 (TCPA) provides that planning permission is required for the carrying out of any development of land. What constitutes “development” for the purposes of s57 is set out at s55 TCPA and means “the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land.” Case law has clarified that “operations” comprises activities which result in some physical alteration to the land, which has some degree of permanence to the land itself (*Parkes v Secretary of State for the Environment* [1978] 1 WLR 1308 (CA)). Trial trenching for archaeological surveys is temporary, and the land is backfilled once the survey has been completed. As such, we do not consider trial trenching for archaeological surveys to be a s.55 TCPA “development” operation

for which planning permission is required. Nor does such activity fall within the definitions of “material development” set out in s56(4) TCPA. Therefore, any buildings, moveable structures, works, plant or machinery required temporarily in connection with the trial trenching should be permitted and do not require planning permission.

- The conditions under which Part 4, Schedule 2 Class A development is permitted are that buildings/structure/works etc, are removed once operations have been carried out and that the land is reinstated to its pre operation condition. As above, the trial trenching is a temporary activity and once it has been completed the buildings will be removed and the land reinstated. As such, this condition is satisfied.

(ii)

Fencing

- Part 2 of Schedule 2 to GPDO provides that “Minor operations” in Class A – including the “erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure – constitute permitted development, subject to various restrictions e.g. any new fence must not be higher than 2 metres above ground level (or 1 metre if adjacent to a highway). Assuming any fencing is in compliance with paragraph A1, both in terms of size and position, it will be permitted development and not require planning permission.

(iii) CCTV

- Part 2 of Schedule 2 to GPDO provides that “Minor operations” in Class F – covering “installation, alteration or replacement on a building of a closed circuit television camera to be used for security purposes” – constitute permitted development, provided that the camera sizing and positioning is in compliance with paragraph F1, is sited so as to minimise its effect on

the external appearance of the building on which it is situated and is removed as soon as reasonably practicable after it is no longer required for security purposes.

(iv) Plant

- See (i) above - Has any temporary planning consent, prior notification, or agreement with the

Local Planning Authority been obtained?

- Agreement for access for survey purposes has been secured voluntarily with the landowner and therefore statutory notification procedures are not required. Further, and as set out above, because we consider that the buildings, fencing, CCTV and plant all fall within the definition of permitted development, it is not required for the Applicant or its subcontractors to obtain any temporary planning consent, send any prior notification or enter into any agreement with the Local Planning Authority in respect of the same.

Change of use - How Whitestone considers the land's current use as an operational compound for private commercial survey works does not constitute a material change of use under section 55 of the Town and Country Planning Act 1990?

The carrying out of trial trenching for archaeological surveys is a temporary activity. The buildings, CCTV, fencing and plant required in connection with that activity by the contractors will only remain on the site for as long as is reasonably necessary to carry out that activity, after which the land will be reinstated. As such, there has been no material change of use and we consider the survey works to be permitted development pursuant to Part 4 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO). Therefore, no planning permission is required.

Rationale

- Section 57(1) of the Town and Country Planning Act 1990 (TCPA)

provides that planning permission is required for the carrying out of any development of land. What constitutes “development” for the purposes of s57 is set out at s55 TCPA and means “the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land.” The carrying out of trial trenching for archaeological surveys is a temporary activity and the land will be reinstated once that activity has concluded.

- Part 4 of Schedule 2 to GPDO provides under Class B that the use of any land for any purpose for not more than 28 days in total in any calendar year, (of which not more than 14 days in total may be for the purposes of holding a market or for motor racing) and “the provision on the land of any moveable structure for the purposes of the permitted use” constitutes permitted development. The list of exceptions includes use for festivals, clay pigeon shooting, camping and a range of other activities that do not apply to the current case. The survey activity commenced on 20 January 2026 and the total number of days required to complete the works will not exceed 28 days this calendar year, meaning that the usage falls within Class B and therefore does not require planning permission.

Kind regards

■

Community Relations

Website: www.whitstonesolarfarm.co.uk

Phone: 0800 688 9936

Email: info@whitstonesolarfarm.co.uk

Write to: Whitestone Solar Farm, Freepost SEC New

F- Email to S Sargent Mar 31, 2026, confirming no feedback received and no contact.

— Forwarded message —

From: "Whitestone Solar Farm" <info@whitestonesolarfarm.co.uk>

[Redacted]

Sent: Tue, 31 Mar 2026 at 13:46

Subject: Whitestone

Hello,

We received an email from John Healey asking us to get in touch with you. I understand you've sent us emails, but I can confirm that we haven't received anything, which would be why you hadn't heard back from us. I just want to make sure you have the correct address for us, and please let me know if you have any questions.

Kind regards

[Redacted]

G - Email thread Sept 2025 Re Consultation Materials Request

[REDACTED]
Sent: Thursday, September 25, 2025 4:21 am

To: Whitestone Solar Farm <info@whitstonesolarfarm.co.uk>

Subject: Re: Requested for information

Good Morning [REDACTED]

Many thanks for your email, I think that there may be some misunderstanding by yourselves in relation to what is perceived by us the life changing impact that the project proposed by your employer will have upon our lives as such reviews of only partial information in relation to the project is not deemed acceptable by us.

You will note the time of this email creation - as is normal now since proposals have been made I have been awake for over an hour due to the ongoing stress I now endure since plans were revealed,

As such I will repeat my request for disclosure of all documents in relation to the statutory consultation to be printed for my husband to review - again I will reiterate the collapsing time frame in relation to the consultation and the fact that at this time he has impaired vision.

Please advise if you are willing to print the documents.

Kind regards

[REDACTED]

From: Whitestone Solar Farm <info@whitestonesolarfarm.co.uk>

Sent: Wednesday, September 24, 2025 5:18:21 PM

[REDACTED]
Subject: RE: Requested for information

[REDACTED]
Thank you for your email. I did speak [REDACTED] on the phone the other day.

[REDACTED]
I am sending out to you the A3 copies of the Indicative Master plan, Construction Master plan and Consultation Booklet for Whitestone 1, 2 and 3 as well as the questionnaire.

In terms of the draft Environmental Statement, it is a very long document of over 1000 pages that we are unable to print and mail out individually. I can however send you the non-technical summary of the whole draft ES, which is 73 pages and summarises all the findings in the whole draft ES.

The full draft ES will be available to read in print at all the public information events.

Do let me know if you would like to receive the non-technical summary via post too.

Thanks,

[REDACTED]
Community Relations



[REDACTED]
Sent: 23 September 2025 12:28

To: Whitestone Solar Farm <info@whitestonesolarfarm.co.uk>

Subject: Requested for information

Good Morning,

My husband at the present time has impaired vision and in relation to the statutory consultation cannot review such a large amount of documentation on a computer screen.

As a consultee this information should be readily available, reviewing and understanding of all literature is imperative to his understanding of the project.

I hereby make this formal request for all consultation material to be printed out and sent via First class post to our address.

Should you require confirmation of his impaired vision this can be provided however I request the issue of all documentation is not delayed due to the collapsing time frame of the consultation.

The documentation should be sent to



H - Redacted Land Registry titles / deeds

TITLE NUMBER	
H.M. LAND REGISTRY	
Edition 1 opened 17.10.1986	TITLE NUMBER SYK228744
Map Reference SK4995	
this register consists of 2	
A. PROPERTY REGISTER	
containing the description of the registered land and the estate comprised in the Title	
COUNTY	DISTRICT
SOUTH YORKSHIRE	DONCASTER
<p>The Freehold land shown and edged with red on the plan of the above title filed at the Registry registered on 13 January 1976 being land lying to the south west of Firsby Lane, Conisbrough.</p>	
<p>NOTE 1:-A Conveyance of the land in this title and other land dated 24 June 1920 made between (1) Thomas Bolle Bosville (Vendor) (2) Harry Fitzmaurice Huntsman and others and (3) David Collins contains the following exceptions:-</p>	
<p>EXCEPTED out of the assurance thereby made:-</p>	
<p>(a) The right of passage and running of water and soil from the other lands houses and buildings then or formerly of the Vendor or his predecessors in title in the neighbourhood of the hereditaments thereby conveyed in or through all water courses drains channels and sewers then or thereafter to be made upon or under the hereditaments thereby conveyed</p>	
<p>(b) All lights and rights of light and other easements which might be obstructed or hindered by any buildings or erections then erected or thereafter to be erected upon any neighbouring lands of the Vendor or his predecessors in title</p>	
<p>(c) All beds or seams of coal and other mines minerals and mineral substances and oils lying within under or obtainable from the hereditaments thereby conveyed with liberty for the owners grantees and licensees thereof by means of underground workings only to work get remove carry away and dispose of the whole of such beds of coal minerals and mineral substances and oils and also by means of the roads or ways therein or in the strata above or below the same to work get remove carry away and dispose of any beds of coal minerals and mineral substances and oils within under or obtainable from any other lands without leaving or providing any vertical or lateral support for the hereditaments thereby conveyed or any buildings then or thereafter to be erected thereon and without any liability for any damage by subsidence of the surface or otherwise to the hereditaments thereby conveyed or to any building or erection then or thereafter to be erected thereon and that might have been or might thereafter be caused to such land and buildings consequent upon the working getting and removal of mines minerals mineral substances and oils below the depth of 500 feet below the exposed surface PROVIDED nevertheless that as regards any beds of coal or minerals within the depth of 500 feet below the exposed surface fair and reasonable compensation should be paid by the persons working and getting the minerals to the Purchaser for any damage that might be caused to any building for the time being on the surface by reason of the working getting and removal of the said mines minerals and mineral substances within the depth of 500 feet below the exposed surface save and except that this proviso should not extend to so much of the hereditaments thereby conveyed as lies between the lines marked A B on the said plan</p>	
<p>This registration takes effect subject thereto and the mines and minerals so excepted are excluded from the registration</p>	
<p>REMARK :-No copy of the plan referred to was produced on first registration</p>	

Demand No. 8882379 12/84 W & W Ltd. 1314

32

Any entries struck through are no longer subsisting

H.M. LAND REGISTRY

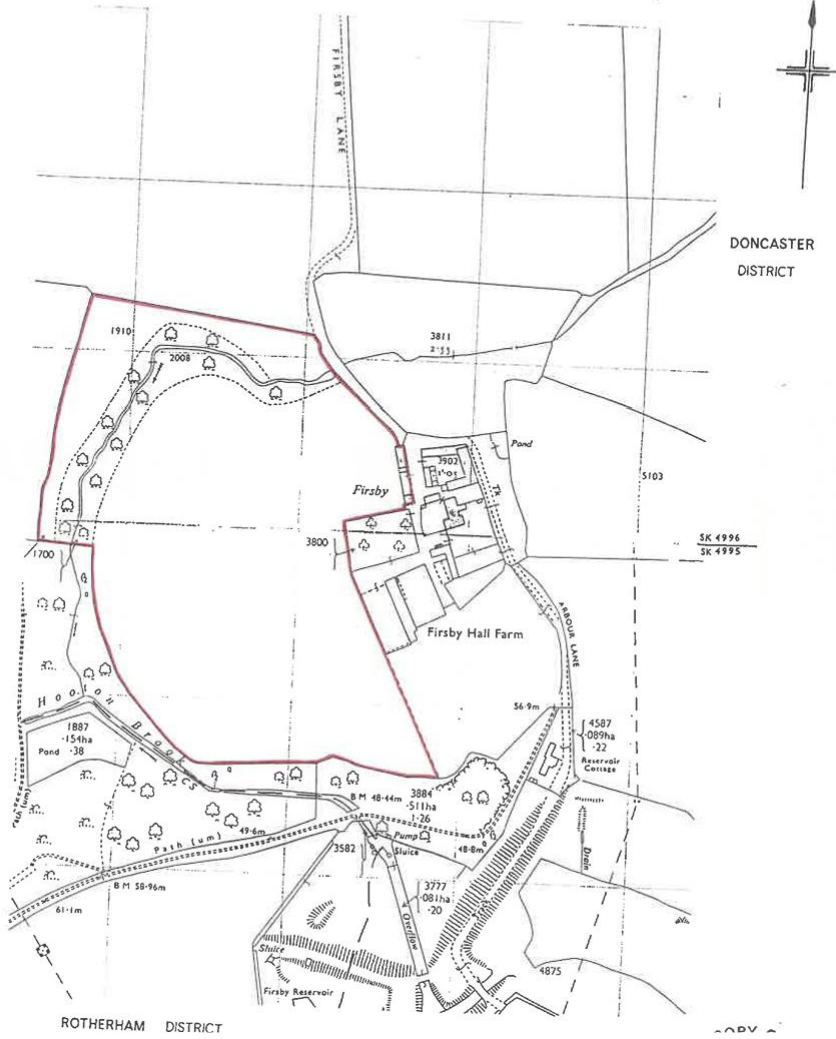
TITLE NUMBER

ORDNANCE SURVEY
PLAN REFERENCE SK 4995 SK 4996

Scale
1/2500

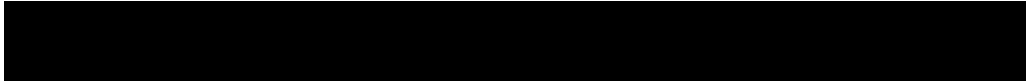
COUNTY SOUTH YORKSHIRE DISTRICT

© Crown copyright 1987





Title register for:



2BB (Freehold)

Title number: SYK618153

Accessed on 08 May 2024 at 20:16:15

This information can change if we receive an application. This service can not tell you if HM Land Registry are dealing with an application.



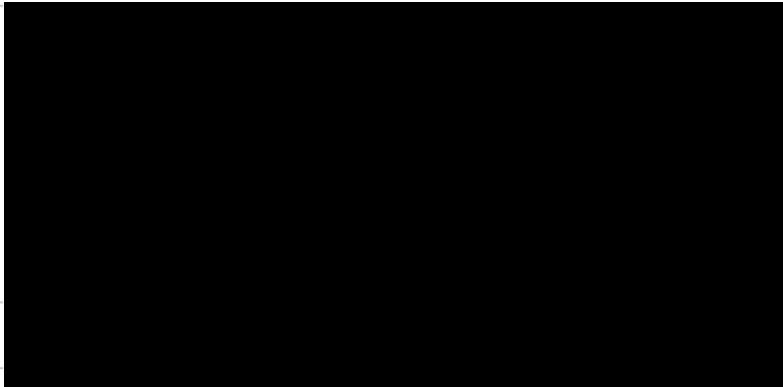
This is not an official copy. It does not take into account if there's a pending application with HM Land Registry. If you need to prove property ownership, for example, for a court case, you'll need to order an official copy of the register.

Register summary

Title number



Registered owners



Last sold for

A: Property Register

This register describes the land and estates comprised in this title.



Title register for:

land on the east side of Arbour Lane, Conisbrough, Doncaster (Freehold)

Title number: [REDACTED]

Accessed on 21 January 2025 at 12:36:59

This information can change if we receive an application. This service can not tell you if HM Land Registry are dealing with an application.



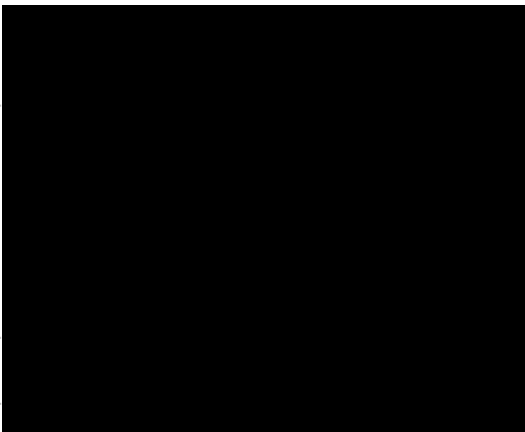
This is not an official copy. It does not take into account if there's a pending application with HM Land Registry. If you need to prove property ownership, for example, for a court case, you'll need to order an official copy of the register.

Register summary

Title number

Registered owners

Last sold for



A: Property Register

This register describes the land and estates comprised in this title.

Entry number	Entry date	
1	1976-01-13	SOUTH YORKSHIRE : DONCASTER



GOV.UK

Search for land and property information

Title register for:

**Reserve House, Arbour Lane, Conisbrough, Doncaster, DN12 2ED
(Freehold)**

Title number: SYK45992

Accessed on 22 April 2025 at 10:47:47

This information can change if we receive an application. This service can not tell you if HM Land Registry are dealing with an application.



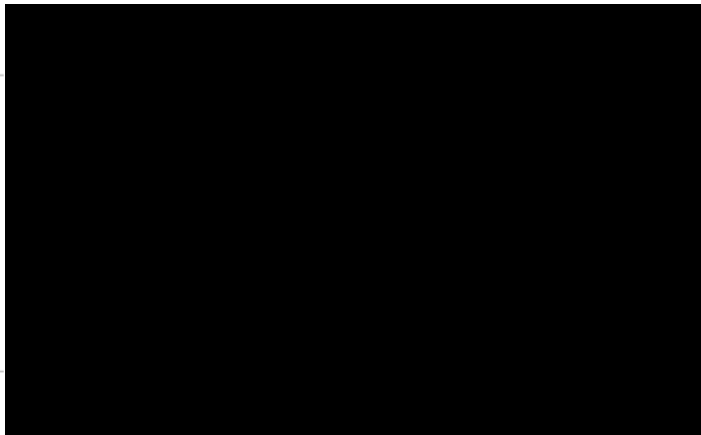
This is not an official copy. It does not take into account if there's a pending application with HM Land Registry. If you need to prove property ownership, for example, for a court case, you'll need to order an official copy of the register.

Register summary

Title number

Registered owners

Last sold for



A: Property Register

This register describes the land and estates comprised in this title.

We hereby certify that this is a true copy of the original

Hickmott

H.M. LAND REGISTRY

LAND REGISTRATION ACTS 1925 to 1971



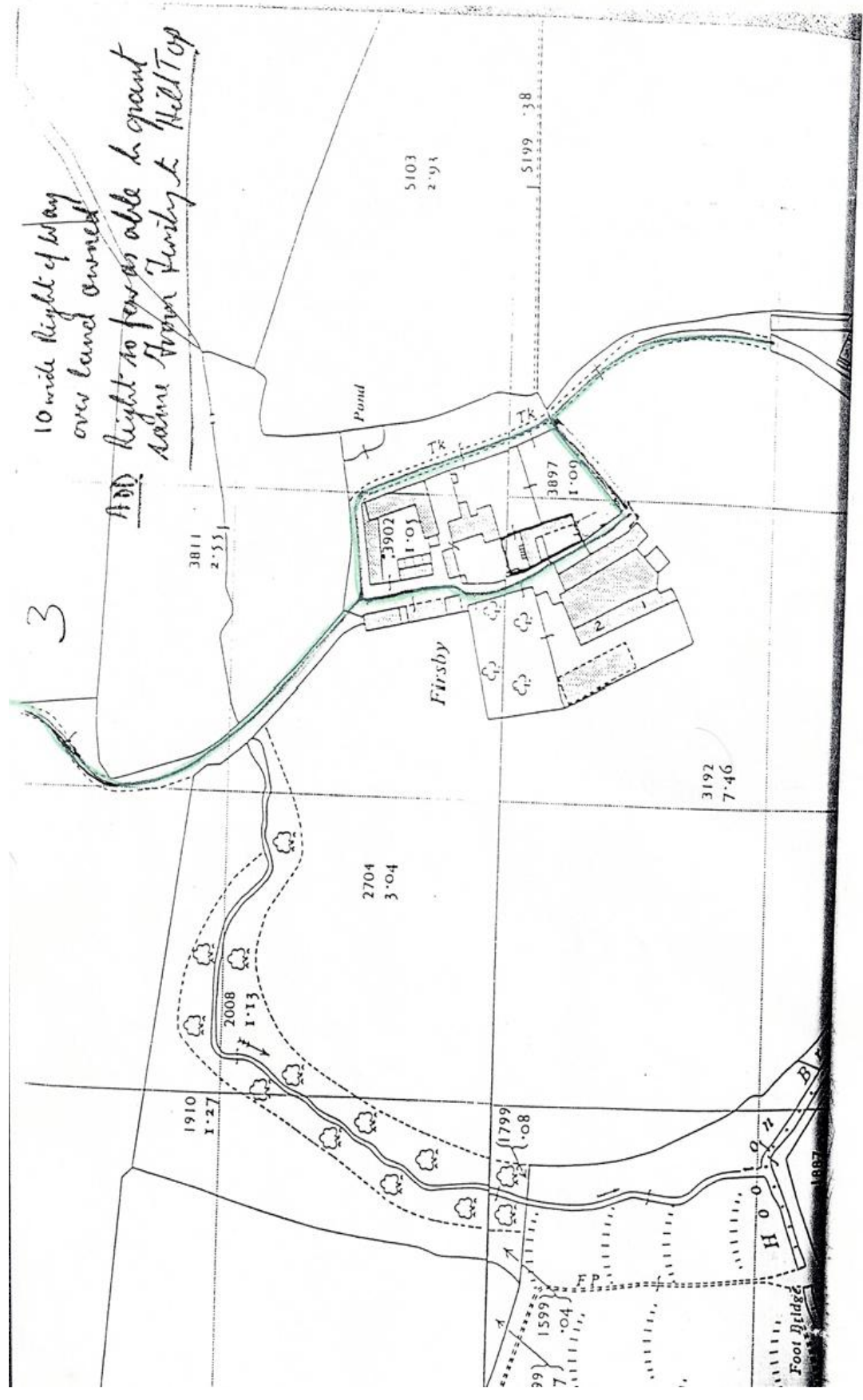
TRANSFER OF PART IMPOSING FRESH RESTRICTIVE COVENANTS

County and District: SOUTH YORKSHIRE - DONCASTER AND ROTHERHAM
Title No: SYK 27084
Property: Barn 1 Firsby Hall Farm, Firsby Conisbrough

Shi Madd 1994

1. IN CONSIDERATION of [redacted] (the receipt of which is acknowledged) I [redacted] of [redacted]

Yorkshire ('the Transferor') as Beneficial Owner HEREBY TRANSFER to S [redacted] Close [redacted] the land shown and edged with red on the Plan No. 1 attached hereto and being known as [redacted] aforesaid Together with the paddock and being part of the property comprised in the title above mentioned Together With (1) a right of way (in common with the Transferor and all other persons authorised by her) at all times and for all purposes with or without vehicles over and along the strip of land ten feet wide shown on Plan No. 3 attached hereto and thereon coloured green and the Transferees paying a proportionate part according to user of the cost of maintaining and repairing the same (2) the right to enter the Transferor's adjoining property upon



J- Resident statements confirming non-service

Resident Statement – Section 42 Consultation

I, [REDACTED] am the freehold owner and/or occupier of [REDACTED]
[REDACTED]

I confirm that I hold a qualifying interest in land within or directly affected by the proposed Whitestone Solar Farm development, including proximity to proposed solar panels and associated infrastructure

I confirm that I did not receive a Section 42 notice, consultation letter addressed to me as a person with an interest in land, or associated statutory consultation documents from Whitestone Net Zero Ltd at any point during the statutory consultation period.

I did receive general information about the proposal made available to the wider community. However, I was not formally identified or consulted as a person with an interest in land.

I made attempts to engage with the Applicant during the consultation period but did not receive a response.

I was subsequently contacted by the Applicant on 31 March 2026 following external intervention by my MP. Prior to this, I had not received any direct response or engagement from the Applicant.

To the best of my knowledge, I have not been served with any formal notice under Section 42 of the Planning Act 2008.

This statement is true to the best of my knowledge and belief.

Name: [REDACTED]

[REDACTED]

Date: 11/04/2026

We, [REDACTED] are the freehold owners of [REDACTED]

We confirm that we hold qualifying interests in land within or directly affected by the proposed Whitestone Solar Farm development.

We confirm that we did not receive a Section 42 notice, consultation letter addressed to us as persons with an interest in land, or associated statutory consultation documents from Whitestone Net Zero Ltd at any point during the statutory consultation period.

We did receive general information about the proposal made available to the wider community. However, we were not formally identified or consulted as persons with an interest in land.

We note that representatives of the Applicant, including the Managing Director, Jonathan Thompson, attended our property on more than one occasion and engaged with us directly in relation to the proposed development.

Despite this direct engagement and clear awareness of our property and our interest in it, we were not formally served with a Section 42 notice or otherwise consulted in our capacity as persons with an interest in land.

We are aware that other nearby properties were identified and consulted by the Applicant. However, we

did not receive any equivalent notification or direct consultation.

To the best of our knowledge, we have not been served with any formal notice under Section 42 of the Planning Act 2008.

This statement is true to the best of our knowledge and belief.

Signed: _____



Name _____

Date _____



Resident Statement – Section 42 Consultation

I, [REDACTED], am a freehold owner of [REDACTED]

I confirm that I hold a qualifying interest in land within or directly affected by the proposed Whitestone Solar Farm development.

I confirm that I did not receive a Section 42 notice, consultation letter addressed to me as a person with an interest in land, or associated statutory consultation documents from Whitestone Net Zero Ltd at any point during the statutory consultation period.

I did receive general information about the proposal made available to the wider community. However, I was not formally identified or consulted as a person with an interest in land.

I was not notified that I had been identified as a person with an interest in land, nor was I contacted directly by the Applicant in that capacity.

I am aware that other nearby properties were identified and consulted by the Applicant. However, I did not receive any equivalent notification or direct consultation.

To the best of my knowledge, I have not been served with any formal notice under Section 42 of the Planning Act 2008.

This statement is true to the best of my knowledge and belief.

Signed:

[REDACTED]

Date: 09/04/2026

Resident Statement – Section 42 Consultation

I, [REDACTED]

I confirm that I hold a qualifying interest in land within or directly affected by the proposed Whitestone Solar Farm development.

I confirm that I did not receive a Section 42 notice, consultation letter addressed to me as a person with an interest in land, or associated statutory consultation documents from Whitestone Net Zero Ltd at any point during the statutory consultation period.

I did receive general information about the proposal made available to the wider community. However, I was not formally identified or consulted as a person with an interest in land.

I was not notified that I had been identified as a person with an interest in land, nor was I contacted directly by the Applicant in that capacity.

I am aware that other nearby properties were identified and consulted by the Applicant. However, I did not receive any equivalent notification or direct consultation.

To the best of my knowledge, I have not been served with any formal notice under Section 42 of the Planning Act 2008.

This statement is true to the best of my knowledge and belief.

[REDACTED]

Name:

[REDACTED]

Date: 09/04/2026

WRITTEN REPRESENTATION

**Consultation Issues, Access, Public Rights of Way, Agricultural Land
and Infrastructure Siting – Material Change and Assessment**

Whitestone Solar Farm (EN0110020)

Submitted by **Firsby Residents Association (FRA)**

Submitted to: Rotherham Metropolitan Borough Council and City of Doncaster Council

Purpose: To support the Councils' assessment of consultation adequacy and associated access and impact considerations

Applicant: Whitestone Net Zero Ltd

Executive Summary

This Written Representation is submitted on behalf of the Firsby Residents Association in relation to the proposed Whitestone Solar Farm (EN0110020). It focuses on the adequacy, deliverability and assessment of access arrangements for Whitestone 1 (W1), and the resulting impacts on Public Rights of Way, agricultural land, safety and the wider environment.

The Applicant has confirmed that access to Whitestone 1 will be solely via a single point on the A630. This represents a material change to the Proposed Development. However, the Environmental Statement and Transport Assessment have not been updated to reflect this change. As a result, the assessment of traffic, safety, air quality and cumulative impacts is based on assumptions that have materially changed and are no longer representative of the scheme as now proposed.

This undermines the reliability of the Application and prevents a meaningful assessment of the likely significant effects of the development. The Councils are therefore being asked to consider a scheme where the assessed impacts do not align with the current design.

In parallel, **both non-statutory and statutory consultation were undertaken on the basis of an access strategy that is no longer proposed.** Consultees were not provided with accurate or finalised information regarding the access arrangements that now form a central component of the scheme. As a result, the consultation process has not meaningfully tested the impacts of the Proposed Development as it now stands.

This includes the concentration of all traffic along a single corridor affecting sensitive receptors and committed development in close proximity, which were not clearly communicated or subject to targeted consultation.

Over 10,000 consultation responses were received, but these were based on an access strategy that has since materially changed and is no longer representative of the scheme as now proposed

The evidence presented in this submission demonstrates that the access strategy remains undefined in key respects, including junction design and internal routing, and that it relies on a constrained corridor with known safety, congestion and air quality issues. The concentration of all traffic onto a single access point introduces additional risks that have not been properly assessed.

Furthermore, the lack of clarity regarding internal access tracks prevents proper assessment of impacts on Public Rights of Way and Best and Most Versatile agricultural land. Evidence from survey works shows that conflict with bridleways is likely and has already occurred, indicating that these impacts are real and not theoretical.

This change also has direct implications for consultation adequacy, as consultees were not presented with the scheme as now proposed and were therefore unable to provide informed feedback on its actual impacts.

Taken together, these issues demonstrate that the Environmental Statement does not provide sufficient or reliable information to enable a proper assessment of the Proposed Development. Both the assessment and consultation processes are based on assumptions that have materially changed, and the resulting uncertainties go to the heart of the scheme's acceptability.

In these circumstances, it cannot be concluded that the Proposed Development is safe, suitable or deliverable, and the submitted material cannot reasonably be relied upon to determine its acceptability.

This document should be read alongside separate representations concerning consultation deficiencies. However, the matters addressed here are distinct and relate to the fundamental design, assessment and deliverability of the Proposed Development.

These matters are also directly relevant to the adequacy of consultation, as the access arrangements and associated impacts were not clearly presented or tested with affected persons during the statutory consultation process.

1. Overview of Concerns

The Applicant has not demonstrated a safe, suitable or deliverable access strategy for Whitestone 1. The Proposed Development is reliant on a single access route via the A630, with no confirmed junction design and no viable alternatives. This uncertainty extends to the internal access network, which remains undefined in terms of its layout, construction and operation.

As a consequence, the Environmental Statement does not enable a meaningful assessment of the interaction between construction traffic, Public Rights of Way, agricultural land and key infrastructure. The absence of this information is particularly significant given that the Site lies within the Green Belt and includes land classified by the Applicant as Grade 2 and Grade 3a agricultural land, representing Best and Most Versatile land.

These issues are not isolated but cumulative. The lack of certainty in access design results in a wider failure to assess environmental, safety and land-use impacts across the site.

2. Access Strategy and the A630 Corridor

The Applicant's proposed access strategy for Whitestone 1 is now wholly dependent on a single point of access from the A630. While this has been presented as a refinement following consultation, the supporting evidence indicates that this approach introduces significant constraints that have not been resolved.

The Transport Statement confirms that access arrangements remain subject to ongoing design development and consultation, stating that construction and decommissioning access will be confirmed as the Proposed Development progresses. This confirms that a fundamental component of the scheme remains undefined at the point of examination.

The reliance on a single access route is particularly concerning given the existing conditions along the A630 corridor. The route is already heavily trafficked and has a documented history of congestion and safety issues. In addition, independent reporting has identified the A630 through Conisbrough as one of the most polluted corridors within Doncaster, with nitrogen

dioxide levels exceeding recommended thresholds. The Applicant's own assessment acknowledges that construction traffic associated with the development may exceed screening thresholds in Air Quality Management Areas along this route .

In this context, the concentration of all construction and operational access via the A630 has the potential to exacerbate existing air quality issues in an area already subject to elevated pollution levels. Despite this, no detailed assessment has been provided of cumulative impacts, including those arising from committed development and background traffic growth.

The absence of a confirmed access design, combined with reliance on a constrained and environmentally sensitive corridor, raises fundamental concerns regarding both the deliverability and environmental acceptability of the Proposed Development.

2A. Material Change to Access Strategy and Reliance on Outdated Evidence

Since the preparation of the Environmental Statement and Transport Assessment, the Applicant has confirmed that access to Whitestone 1 will now be solely via a single point on the A630. This represents a material change from the previously assessed scenario, which considered multiple access routes and distributed traffic movements across the wider road network.

The Transport Statement and associated assessments rely on modelling that includes alternative routes such as the B6376, Ruddle Lane and surrounding local roads. These routes are no longer proposed for use. As a result, the baseline assumptions underpinning the Environmental Statement are no longer valid.

This change has **two critical implications**. First, it concentrates all construction and operational traffic onto a single corridor, materially increasing the intensity of impact along the A630. Second, it renders the existing assessment unreliable, as it does not reflect the actual access strategy now being proposed.

No updated modelling, reassessment, or revised Environmental Statement has been provided to account for this change. In the absence of such information, it is not possible to determine the true scale of traffic, safety, air quality or cumulative impacts arising from the Proposed Development.

This represents a fundamental evidential gap in the Application.

2B. Concentration of Traffic and Network Resilience

The revised access strategy results in all construction traffic, including Heavy Goods Vehicles (HGVs) and workforce vehicles, being routed via a single access point on the A630.

Previous assessment scenarios included the distribution of traffic across multiple routes. The removal of these alternatives eliminates any opportunity to disperse vehicle movements or reduce pressure on constrained sections of the network.

Evidence presented within the Applicant's own Transport Statement indicates significant increases in HGV movements across the study area, including substantial percentage increases on local routes. These figures demonstrate the scale of vehicle activity associated with the Proposed Development. When applied to a single access corridor, this level of activity would result in a concentrated and intensified impact.

This approach introduces a clear lack of network resilience. Any disruption on the A630, including collisions, congestion or flooding, would directly affect access to the Site, with no alternative routing available.

The presence of committed development in close proximity to the access point further reduces network resilience.

The Environmental Statement does not assess this single-route scenario and therefore fails to consider the consequences of concentrated traffic flows or the risks associated with reliance on a single access corridor.

2C. Road Safety and Collision Risk

The A630 corridor has an established record of collisions, including serious and fatal incidents, as identified within the Applicant's own Transport Statement and supporting evidence.

Collision data within the study area demonstrates that the A630 and associated routes already operate with a measurable level of risk. The introduction of additional construction traffic, particularly HGV movements, would increase both the frequency and severity of interactions on this corridor.

Importantly, the existing assessment does not consider the revised scenario in which all traffic is concentrated onto the A630. The removal of alternative routes results in a greater intensity of vehicle movements at a single access point, increasing turning conflicts, queuing, and interaction with existing traffic flows.

This is particularly significant in the context of nearby sensitive receptors, including residential areas, schools and pedestrian crossing points.

In the absence of an updated safety assessment reflecting the revised access strategy, it cannot be concluded that the Proposed Development would operate safely or in accordance with relevant policy requirements. No evidence has been provided of any site-specific safety assessment.

These matters are directly relevant to consultation adequacy, as affected persons were not provided with sufficient information regarding access arrangements, traffic routing, and associated risks to enable informed participation in the consultation process.

3. Air Quality Impact Not Reassessed for Targeted Consultation

The A630 corridor through Conisbrough is identified as an area experiencing elevated levels of nitrogen dioxide (NO₂), with evidence indicating exceedances of recommended thresholds and proximity to Air Quality Management Areas.

The Applicant's own assessment acknowledges that construction traffic associated with the Proposed Development may exceed screening thresholds for air quality impacts along this route.

The revised access strategy, which concentrates all traffic movements onto the A630, has the potential to exacerbate these existing conditions. Increased vehicle flows, particularly HGVs, would contribute to additional emissions in an area already subject to environmental stress.

In addition, a committed residential development of approximately 239 dwellings on land to the south east of Old Road (DN12) is located in close proximity to the same access corridor. This development will generate additional traffic movements, including during its construction phase. However, no assessment has been provided of the cumulative effects of these developments operating concurrently.

This further limits the ability to understand the true scale of traffic and air quality impacts along the A630 corridor.

This omission is particularly significant given the presence of sensitive receptors and the policy requirement to protect public health. The Environmental Statement therefore fails to provide sufficient information to assess air quality impacts arising from the Proposed Development.

3A. Internal Access Tracks and Lifecycle Impacts

The Applicant proposes that construction traffic would travel across the Site via internal access tracks. However, the Environmental Statement provides no meaningful detail regarding the design or extent of this internal network.

The Transport Statement states only that access tracks will be constructed across the Site, without specifying their alignment, width, surfacing or construction methodology. There is no information on how these tracks will interact with Public Rights of Way, nor how crossings will be designed or managed.

This lack of detail extends across all phases of the development. During construction, the scale of land disturbance and the intensity of vehicle movements remain undefined. During operation, the Applicant refers only to occasional maintenance traffic, without assessing how internal routes will be used or maintained over time.

During decommissioning, although traffic levels are expected to increase, **no explanation is provided as to whether internal tracks will be retained, removed or reinstated**, nor how land will be restored.

This uncertainty is not limited to assessment but extends to consultation, as the potential permanence of access infrastructure has not been clearly communicated or tested with consultees.

This omission is significant. Internal access tracks are not neutral features; they involve engineering works that can alter soil structure, affect drainage and result in long-term changes

to land capability. These effects are particularly relevant in the context of agricultural land and must be properly assessed.

Furthermore, as the external access point remains undefined, the routing and extent of internal tracks are also uncertain. This prevents any meaningful assessment of the overall access strategy and its environmental impacts.

3B. Spatial Evidence of Access Constraint and Bottleneck

The Applicant's own masterplan (March 2026) provides clear visual evidence of the constrained nature of the access arrangement. As shown on page 16 of this submission, the Site layout channels all vehicle movements through a narrow corridor adjacent to Park Lane and the Public Right of Way network.

The plan demonstrates that the access point serves the entirety of Whitestone 1, creating a physical bottleneck where all construction and operational traffic must pass through a single location. This is further compounded by the proximity of substations and infrastructure within the same corridor.

In addition, Figure 9.2 of the Environmental Statement (page 15 of this submission) shows that this access area is located on land classified as Grade 2 agricultural land. This indicates that the most sensitive and constrained part of the Site is also located within Best and Most Versatile agricultural land.

These figures, when read together, demonstrate that the access strategy is not only constrained but also poorly aligned with environmental sensitivities and land use considerations.

The Environmental Statement does not address this concentration of infrastructure or its implications for safety, land quality or movement through the Site.

4. Public Rights of Way and Bridleways

The Site is intersected by a network of Public Rights of Way, including designated bridleways that provide important recreational access within Conisbrough Parks. The Applicant acknowledges that these routes will not be permanently closed, but that temporary diversions and management measures may be required during construction.

However, no detailed management plan has been provided, and there is no clear explanation of how interactions between construction traffic and users of these routes will be safely managed. In particular, the Applicant has not identified the locations of crossings, the likely frequency of vehicle movements, or the measures that would be implemented to protect equestrians and other vulnerable users.

Evidence gathered during survey works demonstrates that these concerns are not hypothetical. Vehicles have already been observed using a public bridleway for access, resulting in obstruction of the route, vehicle movements along sections with restricted visibility, and reports of unsafe conditions for horse riders. This provides a clear indication of the risks associated with the proposed access approach.

Even where construction traffic is not intended to use bridleways directly, the requirement for controlled crossings introduces unavoidable points of conflict between heavy vehicles and vulnerable users. In the absence of detailed design and assessment, it cannot be concluded that these interactions can be managed safely or without significant impact on the amenity and usability of the PRoW network.

5. Substation Siting and Sensitive Receptors

The Proposed Development includes substations and associated infrastructure comprising transformers, buildings, security fencing, CCTV and lighting . These are substantial and permanent features that introduce an industrial character into a rural landscape.

Where such infrastructure is located in proximity to bridleways, it has the potential to affect both the amenity and perceived safety of users. Noise from transformers, visual intrusion, and the introduction of artificial lighting can all influence how these routes are experienced, particularly by equestrians who are sensitive to sudden movement, noise and unfamiliar structures.

No clear justification has been provided for the siting of substations in proximity to Public Rights of Way, nor is there evidence that alternative locations have been considered in order to avoid or minimise these impacts. In the absence of such justification, the proposed siting appears inconsistent with the objective of maintaining safe and accessible routes within the PRoW network.

5A. Conisbrough Cemetery Chapel – Consultation Gap

Conisbrough Cemetery Chapel is in close proximity to the A630 Sheffield Road and Park Lane bridleway corridor, which forms the primary access route to Whitestone 1. The Chapel is an active and sensitive receptor within a functioning cemetery environment, regularly used for visitation, reflection and remembrance.

Photographic evidence demonstrates the Chapel's open and elevated setting, and its direct relationship with the surrounding landscape and access corridor.

An application has been submitted to Historic England seeking designation of the Chapel as a Grade II listed building, citing its historic, architectural and landscape significance, and its role within a wider heritage setting.

The Applicant has since confirmed that all access to Whitestone 1 will be routed via a single corridor adjacent to this location. This represents a significant intensification of activity in immediate proximity to the Chapel and landscape

However, this change has not been subject to targeted consultation with users of the cemetery or those affected by the use of this access corridor. **Consultees were not made aware that all construction and operational traffic** would be concentrated along a route directly adjacent to this sensitive receptor.

As a result, the potential effects of the Proposed Development on the setting, amenity and experience of the Chapel have not been meaningfully tested through consultation. This further demonstrates that the consultation process has not reflected the scheme as now proposed.

This is particularly significant given the nature of the receptor, where changes to tranquillity, activity and setting are likely to be acutely experienced by users.

See Pages 15 and 16 for images in relation to Conisbrough Chapel, committed housing plans and proposed single site access.

The absence of alternative access routes means that traffic cannot be dispersed, resulting in all movements being concentrated along a constrained corridor.

6. Access onto Agricultural Land and Green Belt

The site comprises of agricultural land within the Green Belt which separates Doncaster and Rotherham. The Applicant's own assessment identifies parts of the site, including areas where internal access tracks may be required, as Grade 2 and Grade 3a land. This land is classified as Best and Most Versatile agricultural land.

The introduction of internal access tracks and associated infrastructure within such land would result in soil compaction, disturbance and potential long-term degradation of agricultural capability. Despite this, no detailed assessment has been provided of the extent of land that would be affected, nor of the measures that would be implemented to protect or restore soil quality.

The uncertainty surrounding the access strategy further compounds this issue. As the location of access points and internal tracks remains undefined, it is not possible to determine the scale or distribution of impacts on Best and Most Versatile land.

In addition, the introduction of engineered tracks, substations and associated infrastructure within the Green Belt has implications for openness and landscape character. While some mitigation may be proposed, no clear assessment has been provided of how these features will be integrated into the landscape or how their cumulative impact will be managed.

7. Access Constraint, Traffic Intensity and Safety Risk (Critical Issue)

The survey works evidenced within document (*FRA Evidence Whitestone Survey Works (W1) Park Lane V1.3NE*) demonstrate that access to the site is effectively constrained to a single route via Park Lane public bridleway. There is no alternative vehicular access to this part of the site, meaning that all movements associated with the works were channeled through this one corridor.

During the survey period, this route was used by a range of vehicles including welfare units, tankers and contractor vehicles. Movements were regular and took place throughout the working day. The route itself is narrow, includes sections of restricted visibility and blind bends, and is shared with pedestrians, cyclists and equestrians.

What is particularly significant is that these impacts arose during survey activity only. Even at this early stage, vehicle movements resulted in obstruction, interaction with members of the public and the need for vehicles to manoeuvre within or directly adjacent to the bridleway. This provides a real-world indication of how the access route operates under use, rather than a theoretical assessment.

The concentration of all traffic along a single access corridor means that any increase in activity will directly increase the level of risk. There is no scope for distributing traffic or avoiding the most constrained sections of the route. In this context, the survey works demonstrate that the route is already operating under pressure, and that further intensification through construction activity would represent a material escalation.

Despite this, there is no evidence that a site-specific assessment of traffic safety was undertaken prior to the works. No traffic management measures were observed, and no mitigation was in place to separate vehicles from public users of the bridleway. This is particularly concerning given the known sensitivity of such routes and the presence of vulnerable users.

Correspondence from the developer indicates that reliance was placed on planning legislation, including permitted development rights, to justify the works. However, this approach does not address the practical safety implications of vehicle movements on a shared access route.

There is no indication that the risks associated with visibility, interaction with equestrian users, or constrained access were formally considered.

Taken together, the evidence suggests that planning interpretation was relied upon in place of a thorough assessment of real-world safety impacts. The result was that vehicle movements took place in a constrained and shared environment without clear evidence of prior risk evaluation or mitigation.

These issues are also directly relevant to consultation. The nature of the access route, the concentration of traffic and the associated safety risks do not appear to have been clearly communicated or tested with affected users. As a result, those most directly impacted were not in a position to fully understand or respond to the practical implications of the proposed development.

The Applicant's documentation indicates that construction traffic, including HGVs and workforce vehicles, will access the site via the A630 using the W1 access corridor. No alternative construction access routes, such as Edlington Lane, are identified for use.

This confirms that all construction-related vehicle movements will be concentrated along a single access route.

When considered alongside the survey works evidence, this is significant. The observed use of Park Lane and associated access routes during the survey period demonstrates how even limited activity results in interaction between vehicles and public users.

The Applicant's stated approach would intensify this use substantially, with all HGV and workforce traffic routed through the same constrained corridor.

The absence of alternative routes means that there is no opportunity to disperse traffic or reduce pressure on the most constrained sections of the network.

The Applicant's masterplan (March 2026) shows that the proposed development is arranged around a defined green corridor alongside Park Lane public bridleway, with the solar array areas positioned immediately adjacent to this route. This reflects the physical constraint of the site, where there is no alternative vehicular access across the wider area, and where historic landscape features, including the former medieval park, have remained largely without access and preserved in their current form.

At the same time, the Applicant's documentation indicates that construction traffic, including HGVs and workforce vehicles, will access the site via the A630 using the W1 corridor, with no alternative routes such as Edlington Lane identified. Taken together, this means that all construction-related traffic will be concentrated along a single, constrained access route which also functions as a public bridleway. The survey works provide a real-world demonstration of how this route operates in practice, showing that even limited activity resulted in interaction between vehicles and members of the public, including those using the route for walking, cycling and equestrian purposes.

No clear evidence has been provided that the safety implications of concentrating traffic along this corridor have been properly assessed or transparently communicated. Residents have repeatedly sought clarification on how access, traffic volume and safety would be managed, but have not received clear or consistent information. In these circumstances, the combination of site layout, access constraints and observed use raises concerns that these impacts have not been fully considered or meaningfully consulted upon.

This layout demonstrates that the constraint is inherent to the design of the scheme rather than arising from temporary or external factors.

Outdated Assessment

The Applicant's confirmation that access to Whitestone 1 will be solely via the A630 represents a material change to the Proposed Development. However, the Environmental Statement and Transport Assessment have not been updated to reflect this change.

As a result, the feedback and assessment of traffic, safety, air quality and cumulative impacts is based on an access strategy that is no longer proposed.

This undermines the reliability of the Application and prevents a meaningful assessment of the likely effects of the development.

In these circumstances, it cannot be concluded that the Proposed Development is safe, suitable or deliverable, and the Application fails to meet the requirements of a robust and evidence-based Environmental Impact Assessment.

These issues are also directly relevant to consultation adequacy. The nature of the access route, the concentration of traffic and the associated safety risks were not clearly communicated or tested with affected users during consultation. As a result, consultees were not provided with sufficient information to understand or respond to the actual impacts of the scheme as now proposed.

8. Fundamental Deficiency in Assessment and Consultation (Core Issue for Examination)

The Applicant has confirmed a **material change** to the access strategy for Whitestone 1 via email, with all construction and operational access now proposed via a single point on the A630 at a point yet determined. This represents a fundamental alteration to a core component of the Proposed Development.

This is particularly significant given the scale of public engagement, with over 10,000 responses submitted during statutory consultation, none of which relate to the access strategy now proposed.

However, no updated Environmental Statement, Transport Assessment, or consultation has been undertaken to reflect this change. The assessment of environmental effects, including traffic, safety, air quality and impacts on Public Rights of Way, is therefore based on assumptions that have materially changed and are no longer representative of the Proposed Development.

At the same time, both non-statutory and statutory consultation were carried out on the basis of an access strategy that is no longer proposed. Consultees were not provided with accurate or finalised information regarding the location, design, and operational implications of a single A630 access point. As a result, the feedback obtained cannot be relied upon as reflecting the impacts of the scheme as it now stands.

This creates a fundamental and interrelated deficiency. The environmental assessment does not assess the current scheme, and the consultation process has not meaningfully tested it.

Access is not a peripheral detail; rather, it is a central design parameter that directly shapes the scale, distribution and overall significance of environmental effects. When such a material change occurs, it is imperative that the scheme is reassessed and, where appropriate, subject to further consultation. This ensures that decision-makers and those affected are able to fully understand and evaluate the likely impacts of the proposal.

In the absence of an updated assessment and further consultation, furthermore, the consultation responses received do not relate to the amended design, and key environmental effects have not been properly tested or substantiated. The Councils are being asked to consider the adequacy of consultation and the reliability of the supporting assessment.

This situation creates a fundamental gap within the Application, preventing a robust and evidence-based examination of the likely significant effects of the Proposed Development. As a

result, confidence in the completeness and reliability of the Environmental Statement is undermined.

Given these circumstances, the Councils may reasonably conclude that the submitted material cannot be relied upon

9. Consultation Failure Arising from Material Change to Access Strategy

The consultation feedback obtained in relation to Whitestone 1 was assessed by the Applicant on the basis of an access strategy that included multiple routes and distributed traffic movements across the wider network. The Applicant has reported receiving in excess of 10,000 responses during the statutory consultation.

The Applicant has since confirmed a fundamental change to this approach, with all access now proposed via a single point on the A630. This materially alters both the scale and distribution of traffic impacts, with effects concentrated along the A630 corridor through Conisbrough. It is reasonable to conclude that the feedback received would have been materially different had consultees been presented with a single, concentrated access strategy of this nature.

The Applicant's confirmation that all traffic associated with Whitestone 1 will be routed along this corridor introduces a material change in activity and intensity in close proximity to this location. However, this impact was not clearly communicated during consultation, and no targeted engagement has taken place with those affected by the use of this route. As a result, the effects of the Proposed Development on this receptor have not been meaningfully tested through consultation, further demonstrating that the consultation process does not reflect the scheme as now proposed.

As a result, the feedback previously obtained is no longer representative of the Proposed Development as it now stands. Matters raised by consultees, including those relating to traffic, safety and environmental effects, were considered in the context of a different access arrangement and cannot be assumed to reflect the impacts of a single, concentrated access route

This deficiency is further illustrated by the presence of sensitive receptors that have not been subject to targeted consultation under the revised access strategy. Conisbrough Cemetery Chapel, located adjacent to the Park Lane bridleway corridor, represents a highly sensitive receptor where changes to tranquillity and activity are likely to be acutely experienced.

This issue is compounded by the presence of other committed development in the same location, including a residential scheme of approximately 239 dwellings on land to the south east of Old Road, situated in close proximity to the proposed access corridor. The cumulative effects of this development, in combination with the revised single-access strategy, were not clearly communicated during consultation. Consultees were therefore not provided with sufficient information to understand the combined impact of multiple developments on the same constrained route. This further demonstrates that the consultation process does not reflect the scheme as now proposed or its likely cumulative effects.

The retention of access infrastructure beyond the operational phase represents a materially different impact to that presented during statutory consultation. The Applicant's materials did not clearly communicate the potential for internal access tracks and associated infrastructure to remain within the Green Belt following decommissioning. As a result, consultees were not provided with sufficient information to understand or assess the true long-term effects of the Proposed Development. This further undermines the effectiveness of the consultation process, as required under Section 42 of the Planning Act 2008.

This change therefore skews the consultation evidence base and limits the extent to which responses can be relied upon to understand the likely effects of the current scheme.

10. Overall Assessment and Conclusion

The Applicant has confirmed a material change to the access strategy for Whitestone 1, with all construction and operational traffic now proposed via a single point on the A630. However, the Environmental Statement and Transport Assessment have not been updated to reflect this change, and the assessment of environmental effects remains based on an access strategy that is no longer proposed.

This results in a fundamental misalignment between the scheme as assessed and the scheme as now proposed. The concentration of all traffic onto a single constrained corridor introduces materially different impacts in relation to traffic, safety, air quality, Public Rights of Way and the wider environment, including the intensification of activity adjacent to sensitive receptors.

These effects are further compounded by the presence of committed development in close proximity to the access point, and by the absence of clarity regarding the extent and permanence of internal access infrastructure within the Green Belt. Taken together, these factors demonstrate that the likely impacts of the Proposed Development have not been properly assessed.

Critically, these changes have not been subject to meaningful consultation. The consultation process was undertaken on the basis of a different access strategy, and the feedback received cannot be relied upon as reflecting the impacts of the scheme as now proposed. This includes impacts on specific receptors, such as those along the Park Lane corridor and at Conisbrough Cemetery Chapel, which have not been subject to targeted engagement despite the material change in access arrangements.

Access is a fundamental design parameter that directly influences the scale, distribution and significance of environmental effects. A change of this nature requires reassessment and, where necessary, further consultation. In the absence of both, RMBC and DCD are being asked to examine a scheme where:

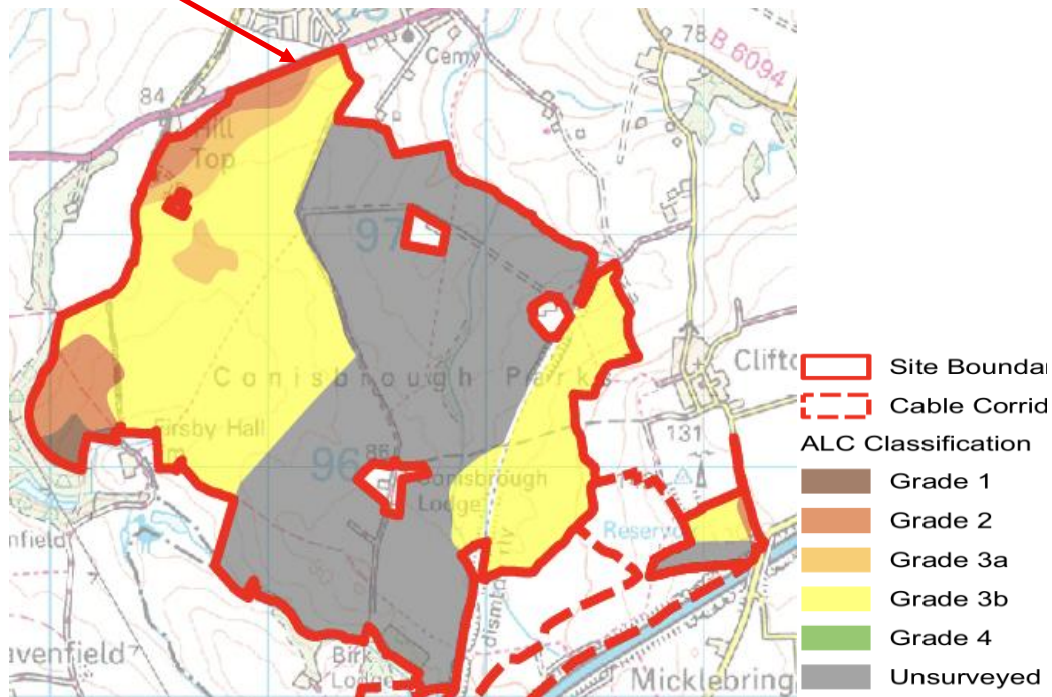
1. the assessed impacts do not correspond to the current design;
2. the consultation responses do not relate to the scheme as now proposed; and
3. key environmental and cumulative effects have not been properly tested.

These issues do not arise in isolation but indicate a pattern of constrained access, limited assessment, and insufficient communication of impacts.

This represents a fundamental and material deficiency in the Application. The Environmental Statement does not provide sufficient, robust or reliable information to enable a proper assessment of the likely significant effects of the Proposed Development.

In these circumstances, it cannot be concluded that the Proposed Development is safe, suitable or deliverable, and the submitted material cannot reasonably be relied upon to determine its acceptability.

1. Draft-ES-Volume-2-Figure-9.2-ALC-Survey-Results showing Grade 2 around access point.



Whitestone-1-masterplan-Mar-2026 showing location of substation and the section for access to entire site which would create a bottle neck next to site and Park Lane brideway

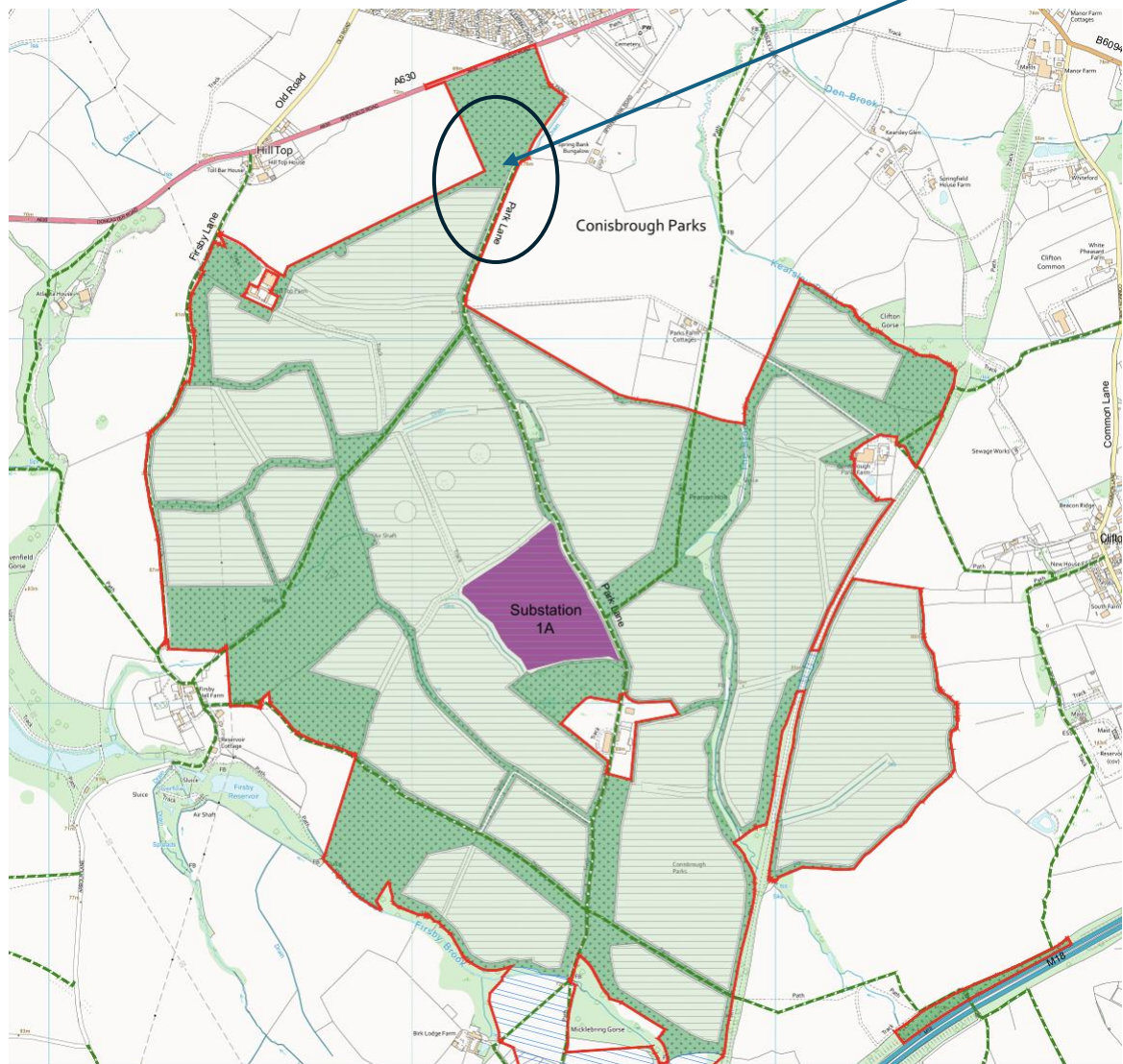
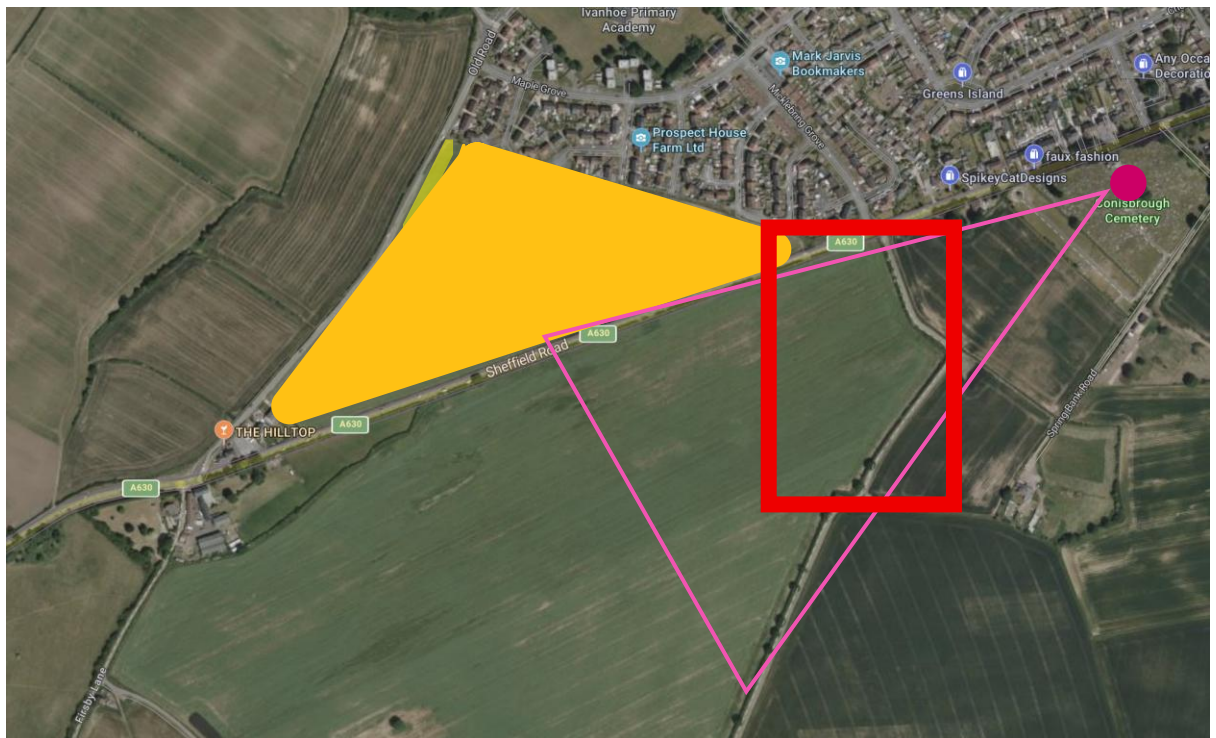


Image showing new housing estate, Conisbrough Chapel, A630 and Park Lane Re Section 5A
Conisbrough Cemetery Chapel – Consultation Gap

New Housing Estate ● Conisbrough Chapel with View Point ● Access Bottleneck ■



Potential Entry point with on Sheffield Road on approach to Conisbrough Chapel

Location of committed residential development (approx. 239 dwellings)



View of Conisbrough Chapel from Park Lane Bridleway proposed entry point.





SAVE OUR GREENBELT

Conisbrough Parks

SAVE OUR GREENBELT (CONISBROUGH PARKS)

Whitestone Solar Farm NSIP EN0110020

FORMAL SUBMISSION ADEQUACY OF CONSULTATION

Report by Save Our Greenbelt (Conisbrough Parks) to the City of Doncaster Council

May 2026

This Report is submitted by Save Our Greenbelt (Conisbrough Parks), a constituted community organisation representing residents including Conisbrough, Clifton, Micklebring, Ravenfield and Hooton Roberts in respect of the Whitestone Solar Farm Nationally Significant Infrastructure Project. It is provided to the City of Doncaster Council to assist the Council in the preparation of its Adequacy of Consultation Representation to the Planning Inspectorate. Save Our Greenbelt respectfully requests that the Council have regard to the analysis set out in this Report, draw upon it as the Council considers appropriate, and append the Report in full to the Council's Representation.

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A. Purpose and standing of this submission

1. This Report is submitted by **Save Our Greenbelt (Conisbrough Parks)** (“SoG”) to the City of Doncaster Council (“the Council”) in connection with the proposed application for a Development Consent Order in respect of the Whitestone Solar Farm Nationally Significant Infrastructure Project (PINS reference **EN0110020**), promoted by Whitestone Net Zero Ltd (“the Applicant”). The Applicant’s stated programme is for submission of the application in late May 2026.
2. Save Our Greenbelt is a constituted community organisation formed in response to the Whitestone Solar Farm proposal. It represents residents of the communities most directly affected by the W1 solar generation area: principally Conisbrough, Clifton, Micklebring, Ravenfield and Hooton Roberts. SoG operates a formal Community Supporter Register. Individual residents take a positive act of registration to align themselves with the campaign’s objectives, and SoG is therefore able to demonstrate in evidential terms the breadth and depth of community alignment in respect of this NSIP. The Conisbrough Parks landscape, including the recently scheduled Romano-British Villa (SM1491751) and the medieval Deer Parks of Conisbrough Castle, sits within the administrative area of the City of Doncaster Council. SoG’s engagement with the Council on the adequacy of the Applicant’s pre-application consultation is grounded in that direct community interest.
3. **Purpose of this Report.** This Report is provided to assist the Council in the preparation of its Adequacy of Consultation Representation (“AoCR”) to the Planning Inspectorate (“PINS”) at the acceptance stage of the proposed application. SoG invites the Council to:
 - (a) have regard to the matters set out in this Report when forming the Council’s view on the adequacy of the Applicant’s pre-application consultation;
 - (b) draw upon any element of this Report - in full or in part - in the Council’s own AoCR; and
 - (c) append this Report in full to the Council’s AoCR as SoG’s evidence on the adequacy of consultation.
4. **Approach.** SoG has taken planning and legal advice in preparing this Report. It does not oppose renewable energy development in principle, and recognises the national policy framework for energy infrastructure. Its concern is narrower: an application for development consent of this scale - approximately 1,173 hectares, a generating capacity of up to 750 MW, and effects extending across at least sixty years - must be supported by a pre-application consultation that meets the standard required by the Planning Act 2008. SoG’s view is that the consultation conducted by the Applicant does not meet that standard.

- 5. Realistic ambition.** SoG recognises that most NSIP applications are accepted at the section 55 stage. It does not invite the Council to frame its AoCR around the unlikely outcome of outright non-acceptance. The realistic ambition is to ensure that the consultation adequacy concerns are placed formally before PINS at acceptance; that they are preserved as live matters for examination if acceptance is granted; and that the cumulative procedural fairness case in respect of this NSIP is built sustainably across the acceptance, Relevant Representations and examination stages.

B. The proposed development and consultation history

The proposed development

- 6.** The Applicant proposes a solar generating station with associated battery energy storage and grid connection infrastructure, comprising three geographically distinct solar generation areas designated W1, W2 and W3 totalling approximately 1,173 hectares, for a stated generating capacity of up to 750 MW. The three areas are linked by cable corridor infrastructure and associated substations, and span the administrative areas of three local planning authorities: the City of Doncaster Council, Rotherham Metropolitan Borough Council, and North East Derbyshire District Council.
- 7.** The W1 solar generation area lies within and across the administrative boundary of the City of Doncaster Council and includes within or immediately adjacent to it the Conisbrough Parks Romano-British Villa (Scheduled Monument SM1491751), the medieval Deer Parks of Conisbrough Castle, and a substantial range of further heritage assets. The communities SoG represents - principally Conisbrough, Clifton, Micklebring, Ravenfield, Hooton Roberts and Firsby - are directly affected by W1, by the cable corridor and associated infrastructure, and by the cumulative effects of the development as a whole. This Report is accordingly directed to the City of Doncaster Council in its capacity as the local planning authority for the area in which the most heritage-sensitive of the three solar generation areas, and the principal Conisbrough Parks landscape, are located.

Consultation chronology

- 8.** The Applicant's statutory consultation under sections 42, 47 and 48 of the Planning Act 2008 closed on 28 October 2025. A targeted consultation on described changes to the draft Order Limits ran between 4 March and 3 April 2026. A Programme Document, a Community Update Newsletter setting out revised masterplans for W1, W2 and W3, and a Targeted Consultation Leaflet running to 43 pages and 31 numbered changes were published in March 2026. The Environmental Statement supporting the application was finalised in April 2026 - approximately six months after the close of statutory consultation.

9. That sequence matters. Between the close of statutory consultation in October 2025 and the intended May 2026 submission, the scheme has evolved materially, the environmental evidence has been completed, and the heritage baseline at W1 has been further investigated. The community has not been the subject of a further statutory consultation under sections 42, 47 and 48 in that period. The targeted consultation between March and April 2026 was, in its own terms, limited to a defined set of described changes, not a further statutory consultation.
10. SoG responded to the statutory consultation on behalf of the affected communities. It had no opportunity to respond to the targeted consultation and, like the impacted communities, was excluded from responding by the Applicant. SoG has engaged with the Applicant through correspondence during the pre-application period.

C. The adequacy framework in outline

11. PINS may only accept an NSIP application for examination if it is satisfied that the applicant has complied with the pre-application duties in Chapter 2 of Part 5 of the Planning Act 2008 - in particular the section 42 duty to consult prescribed consultees, the section 47 duty to consult the local community, the section 48 duty to publicise the proposed application, and the section 49 duty to take account of responses received. Section 55(4) of the Act gives Adequacy of Consultation Representations from local authorities a particular status in that assessment: PINS is required to have regard to them.
12. The decisive statutory question is whether the consultation undertaken complied with those duties in relation to the application **as submitted**. Earlier or provisional iterations of the scheme are not the test. Pre-application consultation is intended to be “front-loaded” - it is the stage at which the community can influence the scheme - and the statutory guidance issued in 2024 expressly anticipates that the design will evolve up to submission. The corresponding limit, which the same guidance recognises, is that the scheme as submitted must still be one whose likely effects have been “fully consulted upon”.
13. SoG accepts that scheme evolution between consultation and submission is lawful in principle and does not argue otherwise. The question in any individual case is one of degree: where the scheme has evolved materially in respect of its nature, its scale, its location, the identity of the communities affected, the likely environmental effects, or the substance of the planning judgment to be made, the earlier consultation may no longer satisfy the statutory duties. The courts have made clear in the planning context that the question is one of substance, not of how the applicant chooses to label the changes - the test is whether consultees had a fair opportunity to engage with the scheme actually submitted.

14. The common law adds two further requirements that have long been settled in consultation law generally. First, consultation must be undertaken based on sufficient information to enable consultees to make an intelligent response; that requirement is reinforced in the NSIP context by the EIA Regulations, which require the Preliminary Environmental Information published during consultation to contain what is “reasonably required” for an informed view of the proposal’s likely significant effects. Second, the responses received must be conscientiously considered by the applicant.
15. The five concerns SoG raises in Sections D and E below are framed against that statutory and common law backdrop. Each goes to whether the consultation, in respect of the application that the Applicant now intends to submit, met the standard required.

D. Summary of Save Our Greenbelt’s concerns

16. SoG raises five concerns. The first four are primary concerns: each, in SoG’s view, is independently material to the adequacy of the consultation. The fifth concern brings together a series of further matters about how the consultation was operated which are most usefully understood cumulatively rather than as freestanding grounds. The strongest framing of SoG’s case, however, is the cumulative one: the concerns set out below are mutually reinforcing, and the case is stronger taken as a whole than as the sum of its parts.
17. **Concern 1 The submitted scheme is not the scheme that was consulted upon.**
The Applicant’s March 2026 revised masterplan - which the Applicant describes as the submission masterplan - differs from the scheme that the community was consulted upon in respects that affect where the impacts fall, which communities are affected, the configuration of associated infrastructure, and the planning balance overall. The community has not had a fair opportunity to comment on the scheme that is actually submitted and had no opportunity to respond to the subsequent targeted consultation.
18. **Concern 2 The environmental evidence was incomplete during consultation.**
The Environmental Statement was not finalised until April 2026, around six months after the consultation closed. Major elements - including the Agricultural Land Classification survey for W1, the Coal Mining Risk Assessment, the outline Construction Traffic Management Plan, the Flood Risk Sequential Test, and parts of the ecology and cumulative effects work - were either incomplete or absent from the consultation materials. The community was being asked to comment without the evidence it needed.

19. Concern 3 Heritage and archaeology at W1 remain unresolved.

Archaeological trial trenching at W1 was still ongoing in March 2026 - after the statutory consultation had closed. The trial trench findings, which may identify previously unknown remains or require further mitigation and design changes, were not before consultees during the consultation. This concern is particularly acute for the communities SoG represents because of the proximity of W1 to the Conisbrough Parks Romano-British Villa (Scheduled Monument SM1491751, designated July 2025) and to other heritage assets across the Conisbrough Parks landscape within the Council's administrative area.

20. Concern 4 A targeted consultation cannot stand in for statutory reconsultation.

The Applicant has chosen to address the post-consultation changes through a targeted consultation rather than a fresh round of statutory consultation. The targeted consultation was limited in its approach, directed principally to Parish Councils rather than to the wider community that had responded to the statutory consultation. The Applicant describes the changes as "minor proposed changes to the draft Order Limits". The Applicant's own materials make that characterisation difficult to sustain: the changes include the removal of entire solar field areas around multiple settlements, the removal of a substation, a 37% reduction in the developable solar area, the introduction of new contingency Brinsworth substation infrastructure with acknowledged flood, heritage and coal mining implications, and a dual-substation contingency arrangement. The question is one of substance, not labels.

21. Concern 5 Cumulative concerns about the consultation process.

Three further matters about how the consultation was operated - the inconsistent Freepost address, the accessibility of the consultation for the most directly affected communities, and the Applicant's treatment of the responses received - do not, individually, necessarily rise to the level of independent failings. Taken together with the primary concerns, however, they materially strengthen the picture that the consultation did not provide affected persons with a fair, stable and intelligible opportunity to engage with the scheme that is actually submitted.

Save Our Greenbelt's submission

SoG's view is that Concerns 1, 2, 3 and 4 are each, individually, capable of supporting a finding that the pre-application consultation has not met the standard required by the Planning Act 2008 in relation to the application as submitted. More importantly, these concerns are mutually reinforcing. The scheme has evolved materially after consultation; the environmental evidence available during consultation was incomplete; the heritage baseline at W1 was unresolved; the targeted consultation does not, in substance, substitute for fresh statutory consultation. Taken together with the Concern 5 process matters, the case is significantly stronger than the sum of its parts. SoG asks the Council to advance the case cumulatively in its AoCR - not as a series of discrete technical defects, but as a single procedural fairness narrative that the consultation, viewed as a whole, did not give the community a fair opportunity to participate in the scheme actually being submitted.

E. The concerns in detail

E1. The submitted scheme is not the scheme that was consulted upon

- 22.** The statutory consultation closed on 28 October 2025. The materials before the community at that stage included a draft Order Limits boundary, draft masterplans for W1, W2 and W3, and supporting environmental and design information. It is based on those materials that SoG and other consultees formulated their responses.
- 23.** In March 2026 the Applicant published a Community Update Newsletter including revised masterplans for W1, W2 and W3 and a stated preferred cable route map. The Applicant's own description makes clear that the changes include the removal of entire solar field areas around multiple settlements; the removal of at least one substation from the consulted masterplan; a 37% reduction in the developable solar area; and the introduction of a dual-substation contingency arrangement. The revised March 2026 masterplan is described by the Applicant as the submission masterplan.
- 24.** SoG accepts, as set out in Section C, that scheme evolution between consultation and submission is anticipated and lawful in principle. SoG does not argue that any post-consultation change requires fresh statutory consultation. The narrower point is this: each of the changes summarised above goes to the substance of the proposal as it affects communities and environment. Removing solar field areas changes where the landscape, visual, heritage, glint-and-glare and ecological impacts fall, and shifts which communities are most directly affected. Removing a substation changes the location and configuration of infrastructure of high environmental significance. A 37% reduction in developable area is not a matter of micro-siting. The dual-substation contingency introduces alternative operational configurations of a kind consultees were not invited to consider during the consultation.

- 25.** Taken together, the changes affect each of the categories that the law treats as material: the nature of the project, its scale, its location, the identity of affected persons, the likely environmental effects, and the substance of the planning judgment to be made. The submitted scheme is not, on the face of the Applicant's own materials, the scheme the community was consulted upon.

Save Our Greenbelt's view

The strongest formulation of this concern is not that "the scheme changed". Schemes evolve. The point is that the changes go to the substance of where and how the development's impacts will fall, and the community was not given the opportunity to engage with the scheme actually submitted.

E2. The environmental evidence was incomplete during consultation

- 26.** This concern is analytically separate from Concern 1. The first concern is about whether the project ultimately submitted differs from the project consulted upon. This concern is about whether the community had enough environmental evidence during the consultation to engage with the project at all.
- 27.** The Environmental Statement was not finalised until April 2026 - around six months after the close of the statutory consultation. The Environmental Statement material before the community during the statutory consultation was drawn from preliminary environmental information and described by the Applicant as such.
- 28.** In the intervening months, on the Applicant's own account, the following work has been completed or substantially completed: archaeological trial trenching at W1; the outstanding part of the Agricultural Land Classification survey for W1 (the Applicant's materials acknowledged that the survey was incomplete at the close of consultation); ecology surveys including breeding bird, badger and bat work; landscape and visual assessment based on the revised masterplan; the transport assessment, including the outline Construction Traffic Management Plan; the Coal Mining Risk Assessment; the Flood Risk Sequential Test; and the Cumulative Effects Assessment. None of this completed work has been the subject of a statutory consultation.

- 29.** SoG recognises that environmental statements are not required to be perfect at submission - the EIA regime allows for deficiencies to be identified and remedied during examination. SoG does not contend that the Applicant's Environmental Statement is so deficient that it ceases to qualify as an environmental statement at all. The concern is the more focused one: that the environmental information available **during the consultation** was not what is reasonably required for consultees to develop an informed view of the proposal's likely significant effects. The categories of incompleteness - landscape, heritage, cumulative impacts, flooding, ecology - are precisely those that bear most heavily on the planning judgment for a scheme of this nature.

Save Our Greenbelt's view

Even if the masterplan had not changed at all between October 2025 and May 2026, the fact that the environmental evidence supporting the submission masterplan was finalised six months after the close of consultation would raise an adequacy issue. This concern is independent of, and additional to, the material divergence point at E1. Taken together, the two are mutually reinforcing: the community was consulted on a scheme the Applicant has now changed, based on environmental information the Applicant itself acknowledged was incomplete and that has now been completed without the community being reconsulted.

E3. Heritage and archaeology at W1 remain unresolved

- 30.** The W1 area sits within a landscape of substantial archaeological sensitivity, much of it within the administrative area of the City of Doncaster Council. The Conisbrough Parks Romano-British Villa was scheduled by the Secretary of State as Scheduled Monument SM1491751 in July 2025 - after the Applicant's draft Environmental Statement was finalised. The scheduling itself is significant: it is evidence that the heritage baseline relied upon during consultation was incomplete, in a way subsequently confirmed by the Secretary of State's designation decision. The wider Conisbrough Parks landscape contains the medieval Deer Parks of Conisbrough Castle, the Firsby Lane medieval pottery industry, a Roman drain (HER 02566/01), Iron Age enclosures, and several other recorded archaeological remains. The Council, in its heritage and planning policy roles, has its own institutional knowledge of the significance of this landscape.
- 31.** On the Applicant's own Programme Document, archaeological trial trenching at W1 was due for completion in March 2026 - some five months after the close of the statutory consultation. The trial trench findings, which may identify previously unknown remains, alter the assessed significance of known remains, require further mitigation, or precipitate consequent design amendments, were not available to consultees during the statutory consultation period.

- 32.** Historic England’s guidance on planning and archaeology, and the National Planning Policy Framework (December 2024, para 207), are both clear that planning decisions on heritage assets must be based on sufficient information about significance, and that intrusive field evaluation may be necessary precisely because desk-based assessment alone is often not enough. SoG’s view is that, where the trenching is itself capable of altering the heritage understanding of W1, the consultation was being conducted on a heritage baseline that was known to be incomplete.

Save Our Greenbelt’s view

This concern is of particular importance to SoG and to the City of Doncaster Council because the Conisbrough Parks landscape is the heritage centre of gravity of W1 and lies principally within Doncaster’s administrative area. SoG’s separate, freestanding position is that W1, W2 and W3 ought properly to have been the subject of three separate Development Consent Order applications, each independently exceeding the 100 MW threshold. If W1 had been treated as a separate application, the trial trenching could have been completed and a complete heritage baseline established before any W1 application was submitted, and this concern would fall away. The Council is invited to take note of that wider argument when forming its view on the cumulative procedural fairness picture.

E4. A targeted consultation cannot stand in for statutory reconsultation

- 33.** The Applicant has chosen to address the post-consultation changes through a targeted consultation rather than a further round of statutory consultation under sections 42, 47 and 48. The targeted consultation ran from 4 March to 3 April 2026. The Applicant’s characterisation of the changes is that they are “minor proposed changes to the draft Order Limits”. The consultation was limited in its approach, directed principally to Parish Councils rather than to the wider community that had responded to the statutory consultation.
- 34.** As noted in Section C, the courts treat the question of whether further consultation is needed as a question of substance, not of how the applicant has chosen to label the changes. SoG’s view is that, on the face of the Applicant’s own targeted consultation materials, the “minor” characterisation is not sustainable. Four points are relevant.

(i) Scale and number of changes

35. The Targeted Consultation Leaflet runs to 43 pages and identifies 31 separately numbered changes, many with lettered sub-changes producing over 40 discrete items spanning every area of the project from Micklebring in the north to High Moor in the south. The removal of entire solar field areas alters landscape, visual, heritage, glint-and-glare and ecological impacts. The removal of a substation alters cumulative effects, visual assessment, construction and operational effects. A 37% reduction in developable area is not, on any reasonable view, a minor refinement.

(ii) The dual-substation contingency arrangement

36. Change 9 introduces new contingency Brinsworth substation infrastructure, with flood risk, heritage and coal mining implications acknowledged in the Applicant's own description. New substation infrastructure with those acknowledged implications cannot fairly be described as a minor change. The contingency arrangement also preserves multiple potential operational scenarios within the Order Limits - raising further questions about the precision of the environmental assessment and whether consultees ever understood the actual infrastructure proposal.

(iii) Multiple unresolved cable route alternatives

37. The Targeted Consultation Leaflet shows that multiple cable route options remain open within the targeted consultation itself. Change 1 proposes an alternative to Cable Route B pending the outcome of environmental and engineering surveys. Change 10 proposes an alternative cable route south of the M1 subject to engineering assessments. Changes 13a and 19a propose further alternatives. The Newsletter's claim that a preferred cable route has been selected is materially qualified by the Applicant's own targeted consultation materials.

(iv) Discouragement of resubmission

38. The Targeted Consultation Leaflet states that the Applicant has already considered the responses received during the statutory consultation and that consultees should not resubmit feedback already provided. That instruction narrows the scope of permissible response during the targeted consultation in a way that is difficult to reconcile with the duty to consult fairly, particularly where the evidence base has changed materially in the intervening months.

39. Taking those four points together, the Applicant's own targeted consultation materials make the "minor" characterisation untenable. The targeted consultation is not, on this evidence, a substitute for the fresh statutory consultation that the scale of the changes properly required.

Save Our Greenbelt's view

SoG respectfully asks the Council to read the Targeted Consultation Leaflet for itself. SoG's view is that, once the Leaflet is read in full, the "minor" characterisation cannot be sustained. If the Applicant later concedes that the changes were in fact material, the adequacy of the targeted consultation as a substitute for statutory reconsultation is directly in question. If the Applicant maintains that the changes are minor, that position is open to challenge by reference to the Applicant's own materials. Either way, the Council's AoCR is well-founded in raising this concern.

E5. Cumulative concerns about the consultation process

40. The matters at E1 to E4 above go to what the community was consulted on and what information was available during consultation. SoG also draws the Council's attention to a series of further concerns going to how the consultation was operated. These concerns are advanced on a more limited basis. SoG does not contend that any of the matters in E5 would, taken in isolation, be likely to result in a finding of inadequacy. The submission is the narrower one: these matters are cumulatively material and, considered alongside the primary concerns, strengthen the case that consultees were not afforded a fair, stable and intelligible opportunity to engage with the scheme that is actually submitted.

(i) Freepost address inconsistency and the integrity of the response record

- 41.** During the statutory consultation, the Applicant used two inconsistent Freepost address formats across its published materials. The discrepancy was identified at the time by Harthill with Woodall Parish Council. Royal Mail's published guidance is clear that Standard Freepost addresses must be reproduced exactly as registered, and that variations may result in mail being returned to sender or not delivered at all. The Applicant has not, to SoG's knowledge, confirmed which of the two formats was the correctly registered address, or that all responses sent to the alternative address have been received and recorded.
- 42.** Consultation cannot meaningfully be said to have been conscientiously considered if responses were not reliably received in the first place. SoG recognises that the practical force of this point depends on the available evidence of actual prejudice, and the strength of the argument is correspondingly limited as a freestanding ground. SoG nevertheless asks the Council to request confirmation from the Applicant on these points in its AoCR. Cumulatively, when read alongside the primary concerns, the integrity of the response record remains a material issue.

(ii) Accessibility and reach of the consultation

43. Three accessibility concerns arise. First, the cost of obtaining hard copy consultation documents - up to £750 for a complete set - was a structural barrier to participation for individual residents and small community-level bodies, including SoG itself. Second, the Applicant's consultation strategy was heavily weighted toward online engagement, which disadvantaged older residents and those in areas of limited or no broadband coverage. Third, the public events programme - seven events across a project corridor of around 12 kilometres affecting at least 14 parish-level bodies and the wider Conisbrough Parks community - did not include any event convenient to the immediately surrounding villages of Hooton Roberts, Clifton, Micklebring and Ravenfield, notwithstanding that these communities lie immediately adjacent to W1 and to the most heritage-sensitive part of the Order Limits. Consultation must be practically accessible to the affected communities; none of these accessibility points is, taken alone, decisive, but cumulatively they reinforce the wider procedural fairness concern.

(iii) Treatment of consultation responses

44. The Applicant states that 10,409 responses were received during the statutory consultation period. Its subsequent treatment of those responses, in the Community Update Newsletter and the Targeted Consultation Leaflet, has been to characterise them as confirmation that the design changes already incorporated into the revised masterplan are responsive to the community's concerns. That is not a proper response to a consultation. A consultation requires substantive engagement with the points raised by consultees, not a procedural framing of consultation responses as endorsement of changes the Applicant had in any event decided to make.

Save Our Greenbelt's view

SoG acknowledges that these process matters are unlikely, taken individually, to support a finding of inadequacy. Absent specific evidence of actual prejudice, the Freepost issue may be characterised as a clerical irregularity and the accessibility points as administrative imperfections. SoG's submission is the more limited one: these matters are most usefully advanced cumulatively. Read alongside the primary concerns, they materially strengthen the broader picture that the consultation did not give the community a fair, stable and intelligible opportunity to participate in the scheme that is actually submitted.

F. The Save Our Greenbelt and Conisbrough Parks perspective

- 45.** SoG draws the Council's attention to four matters bearing on the adequacy question specifically from SoG's perspective as the constituted community voice for the Conisbrough Parks landscape.

Conisbrough Parks: the heritage centre of gravity of W1

- 46.** The Conisbrough Parks landscape, including the recently scheduled Romano-British Villa (SM1491751) and the medieval Deer Parks of Conisbrough Castle, lies within the administrative area of the City of Doncaster Council and constitutes the heritage centre of gravity of the W1 solar generation area. The scheduling of the Villa in July 2025 - after the Applicant's draft Environmental Statement was finalised - is itself confirmation that the heritage baseline used during the consultation period was incomplete. The Council has a particular institutional interest in the integrity of pre-application consultation in respect of a landscape of national heritage significance for which it is the local planning authority. The Concerns at E1, E2 and E3 are of particular significance to the Council and to SoG's communities for that reason.

Community standing through formal supporter registration

- 47.** SoG is not a statutory consultee under section 42 of the Planning Act 2008, and does not claim a status it does not have. SoG's standing in this submission is grounded in its character as a constituted community organisation with a formal Community Supporter Register: each individual supporter has taken a positive act of registration to align themselves with SoG's objectives in respect of the Whitestone Solar Farm proposal. SoG is, on that basis, the formally constituted voice of the residents of Conisbrough, Clifton, Micklebring, Ravenfield and Hooton Roberts in respect of this NSIP. The Council is invited to read SoG's representations in that light.

Accessibility within the Conisbrough Parks area

- 48.** The Conisbrough Parks landscape is served by a network of rural settlements with limited public transport connectivity, in which a substantial number of older residents and those without reliable broadband live. The Applicant's consultation strategy was not calibrated to reach those residents. No public event was held within or convenient to the immediately surrounding villages, notwithstanding that these communities lie immediately adjacent to W1 and to the most heritage-sensitive part of the Order Limits. The accessibility concerns at E5 are particularly pertinent to the communities SoG represents for that reason.

A 60-year footprint in a long-occupied landscape

- 49.** The Applicant's programme is for a development with an operational life of at least 40 years, with construction and decommissioning periods either side, giving an effective duration of around 60 years. The Conisbrough Parks landscape has been continuously occupied across recorded history, with archaeological evidence of habitation extending back to the Roman period and continuous medieval use as a deer park. The proportionality of the consultation duty in respect of a development of that scale and permanence, in a landscape of this depth of occupation and national heritage significance, must be calibrated accordingly.

G. Conclusion and requests to the City of Doncaster Council

- 50.** In summary: the community has not had a fair opportunity to comment on the scheme that the Applicant intends to submit; the environmental evidence available during the consultation was incomplete in material respects; the heritage baseline at W1 - including the Conisbrough Parks landscape within the Council's administrative area - was unresolved at the close of the consultation; the targeted consultation does not, in substance, substitute for the statutory reconsultation that the scale of the changes required; and the cumulative process concerns at E5 reinforce the picture.
- 51.** SoG respectfully invites the Council to take the following steps in the preparation of its Adequacy of Consultation Representation:
- (a)** to consider this Report in full when forming the Council's view, and to draw upon the analysis at Sections D, E and F in the body of the Council's Representation to the extent the Council considers it well-founded;
 - (b)** to append this Report in full to the Council's Representation, so that SoG's evidence is placed formally before the Planning Inspectorate;
 - (c)** to frame the Council's Representation around the practical evidence of what changed, when, and what consultees did and did not have available to them - a chronology-based, evidence-led submission rather than a broad-brush assertion of unfairness;
 - (d)** to ask the Applicant to: (i) confirm whether all responses sent to the alternative Freepost address have been received and recorded; (ii) make available the trial trenching results for W1 and confirm the timing of any consequential design changes, with particular regard to the setting of the Conisbrough Parks Romano-British Villa; and (iii) make available the Coal Mining Risk Assessment, the complete Agricultural Land Classification survey for W1, the outline Construction Traffic Management Plan and the Flood Risk Sequential Test for the application area within the Council's administrative boundary;

- (e) to record in the Council's Representation that the absence of any public event held convenient to many of the Conisbrough Parks communities is a substantive consultation failing in respect of communities directly affected by W1, the cable corridor and the most heritage-sensitive part of the Order Limits; and
 - (f) if PINS accepts the application notwithstanding the Council's Representation, to preserve the consultation adequacy concerns as live matters for examination by recording them in the Council's Local Impact Report and Relevant Representations.
- 52.** SoG is grateful for the Council's consideration of this Report and remains available to provide any further information or clarification the Council may need. SoG will make its own representation to the Planning Inspectorate at the appropriate stage, but considers it important, given the weight given to local authority AoCRs, to assist the Council in the preparation of the Council's own Representation in the manner set out above.

Submitted on behalf of Save Our Greenbelt (Conisbrough Parks)



Chair, Save Our Greenbelt (Conisbrough Parks)

19 May 2026

H. Schedule of supporting documents

53. The following documents support the matters set out in this Report and are available from Save Our Greenbelt on request. Documents within the public PINS case record for EN0110020 are not duplicated here.

No.	Document	Date	Source
1	Whitestone Solar Farm — Programme Document	March 2026	Whitestone Net Zero Ltd
2	Whitestone Solar Farm — Community Update Newsletter (revised W1, W2, W3 masterplans)	March 2026	Whitestone Net Zero Ltd
3	Whitestone Solar Farm — Targeted Consultation Leaflet (43 pp, 31 numbered changes)	March 2026	Whitestone Net Zero Ltd
4	Whitestone Solar Farm — Statement of Community Consultation	2025	Whitestone Net Zero Ltd
5	Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (guidance)	April 2024	DLUHC (now MHCLG)
6	National Policy Statement for Renewable Energy Infrastructure (EN-3)	2023 (updated)	DESNZ
7	Scheduled Monument designation — Conisbrough Parks Romano-British Villa (SM1491751)	July 2025	Secretary of State
8	Historic England guidance on planning and archaeology (relevant Advice Notes)	Various	Historic England
9	National Planning Policy Framework, para 207	December 2024	MHCLG
10	Save Our Greenbelt — Brief to Counsel: Three-DCO Argument (Whitestone Solar Farm)	April 2026	Save Our Greenbelt
11	Save Our Greenbelt — Community Supporter Register (constituted formal supporter base)	2025–26	Save Our Greenbelt
12	Correspondence on Freepost address inconsistency	Sept–Oct 2025	Harthill with Woodall PC

Conisbrough Parks Parish Council

Email: clerk@conisbroughparks-pc.gov.uk

11 March 2026

Whitestone Net Zero Ltd

By email: info@whitestonesolarfarm.co.uk

Re: Proposed Whitestone Solar Farm (EN0110020) — Response to Targeted Consultation (s42 Planning Act 2008 / Regulation 13 EIA Regulations 2017)

Dear Mr Thompson,

Conisbrough Parks Parish Council (the Parish Council) writes in response to the targeted consultation notice dated 4 March 2026, received pursuant to section 42(1)(a) of the Planning Act 2008 and Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations).

The Parish Council is the parish authority in whose area most of the proposed Whitestone 1 (W1) site is located and it has engaged consistently with this application since the first non-statutory consultation in November 2024. The Parish Council has a direct and material interest in the proposed development, its environmental impacts, and the adequacy of the pre-application process.

1. Preliminary Objection: Scope of This Consultation

The Parish Council notes the instruction in the consultation notice that responses should refer only to the numbered proposed changes and that feedback on the project as a whole will not be considered. The Parish Council formally objects to this limitation.

This notice is a statutory notice issued under s42(1)(a) of the Planning Act 2008 and Regulation 13 of the EIA Regulations 2017. Neither provision empowers the Applicant to restrict the scope of representations made by a prescribed consultee. The Parish Council is entitled, and in the discharge of its public duties is obliged, to raise any material consideration relevant to the proposed development that has arisen or changed since the statutory consultation of September to October 2025.

The Parish Council therefore provides responses to the proposed changes as far as the materials supplied allow, and raises below matters of legal and environmental significance that this Regulation 13 notice brings into focus. The Applicant is required to have regard to these representations and record them accurately in the Consultation Report.

2. Response to the Proposed Changes — Whitestone 1

The following responses are provided on the basis of the documents/maps received and the general descriptions in the notice.

Road works

The roads serving the W1 area — including those adjacent to Clifton and routes through Conisbrough Parks — are narrow rural lanes with limited passing capacity. The Parish Council raises the following concerns:

- Any hedge or vegetation trimming adjacent to or within the setting of Scheduled Monument SM1491751 (Romano-British Villa, Conisbrough Parks) requires a heritage impact assessment before works commence. Confirmation is required that this has been carried out and that the results will be included in the Environmental Statement.
- Temporary signage and speed limits are inadequate mitigation for HGV construction traffic at this scale. A Construction Traffic Management Plan specific to W1 access routes, prepared in consultation with the Parish Council, is required.
- The specific grid references and road names for all road works proposed in the W1 area must be provided directly to the Parish Council; they are not discernible from the maps alone.

Cable routes

The proposed changes create alternative cable route options rather than a single defined route, maintaining the indeterminacy previously identified as a fundamental flaw in the Rochdale Envelope in the draft Environmental Statement.

- Confirmation is required of whether any revised or alternative cable route options for W1 pass within the curtilage, setting, or buffer zone of SM1491751 or within the historic Conisbrough Deer Park boundary. This cannot be determined from maps alone without the accompanying environmental impact analysis, which was not supplied.
- If any cable route option passes within these areas, a separate heritage impact assessment specific to that option is required as part of the Environmental Statement.
- The Parish Council reserves its position on the Rochdale Envelope argument in full.

Drainage works

Clarification is required of whether any drainage works affect watercourses within the W1 area or the River Don catchment. Any additional land proposed for drainage infrastructure in proximity to SM1491751 must be subject to archaeological assessment prior to groundworks. The maps alone do not allow the Parish Council to assess this.

Landscaping

The addition of landscaping land to address glint and glare confirms that the original design created visual impacts not adequately mitigated. The Parish Council raises the following concerns:

- New land added to the Order Limits for landscaping constitutes a change to the project boundary. Any such land within the setting of Conisbrough Castle or SM1491751 triggers fresh EIA obligations. The detail required to assess this is in the consultation leaflet that was not supplied.
- Confirmation is required that glint and glare assessment has been carried out in respect of views from Conisbrough Castle, its registered setting, and the public right of way network in Conisbrough Parks.

3. The Scheduling of SM1491751 — A Matter This Consultation is Required to Address

The Romano-British Villa at Conisbrough Parks was designated as Scheduled Monument SM1491751 by Historic England in July 2025, after the draft Environmental Statement had been published. This is a material change to the environmental baseline for W1 that has never been the subject of statutory consultation.

This targeted consultation is issued under Regulation 13 of the EIA Regulations 2017. The scheduling of a nationally significant archaeological asset within the W1 area after the draft ES was produced is at least as significant an environmental change as the Order Limits alterations being consulted upon. The Parish Council formally requires:

- Confirmation that the Environmental Statement as submitted will include a full assessment of SM1491751 as a Scheduled Monument, assessed to the standard required by the NPPF and Historic England's Setting Guidance (GPA3).
- Confirmation of what engagement has taken place with Historic England since the July 2025 scheduling decision specifically in relation to W1 and SM1491751.
- Confirmation that the heritage impact assessment for W1 will be rebaselined to reflect the scheduled status of SM1491751 and will not rely on assessments prepared when the villa was undesignated.

The Parish Council places the Applicant on formal notice that it will raise this matter directly with the Planning Inspectorate if it is not adequately addressed in the Consultation Report and Environmental Statement.

4. Trial Trenching — Results Must Be Supplied Directly

The Programme Document published in February 2026 states that trial trenching at hard infrastructure areas across W1 was due for completion in March 2026. This consultation closes on 3 April 2026.

The Parish Council formally requires the trial trenching results for the W1 area to be supplied directly to the Parish Council by post and email before the close of this consultation. Proposed road works and cable route changes may directly affect areas of archaeological sensitivity identified through that trenching. It is not acceptable to expect the Parish Council to access these results via the project website. If the results cannot be supplied with adequate time remaining before 3 April 2026, the Parish Council requires the consultation period to be extended accordingly.

5. Adequacy of Consultation — Formal Objection

The Parish Council formally objects to the adequacy of the consultation process as it has affected the Conisbrough Parks community, and places this on record for inclusion in the Consultation Report:

- The detailed leaflet and numbered change plans referenced in the s42 notice were not supplied to the Parish Council directly until requested impacting time to assess. Directing a statutory consultee to a project website does not discharge the duty to consult.
- The instruction to limit feedback to numbered changes, is procedurally incoherent and prejudices the Parish Council's ability to engage with this consultation.
- The Adequacy of Consultation Milestone submitted to PINS in February 2026 cannot be treated as settled while a further statutory consultation is live and while SM1491751 has not been the subject of any consultation whatsoever.
- These failures continue a pattern identified during the September 2025 consultation, including the cost of hard copy documents and Freepost address failures.

6. Information Required Directly from the Applicant

The Parish Council requires the following to be supplied directly by post and email, without delay:

- Specific road names and grid references for all road works proposed in the W1 area, including access points for construction traffic (cable routes and landscaping)
- Confirmation of whether any cable route options pass within the setting or curtilage of SM1491751 or the Conisbrough Deer Park boundary.
- Trial trenching results for the W1 area.
- Confirmation of post-July 2025 engagement with Historic England regarding SM1491751.
- Agricultural Land Classification survey results for the W1 site area.

The Parish Council reserves the right to supplement this response in full on receipt of the above materials/clarifications. This letter is copied to the Planning Inspectorate for their information and records.

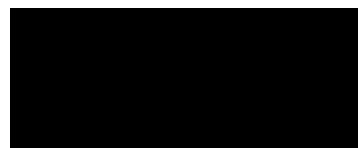
Yours sincerely,



Clerk to Conisbrough Parks Parish Council

cc: The Planning Inspectorate — WhitestoneSolarfarm@planninginspectorate.gov.uk — Re: EN0110020

Conisbrough Parks Parish Council



Email: clerk@conisbroughparks-pc.gov.uk

11 March 2026

 Director
Whitestone Net Zero Ltd





By email: info@whitestonesolarfarm.co.uk

Re: Proposed Whitestone Solar Farm (EN0110020) — Response to Targeted Consultation (s42 Planning Act 2008 / Regulation 13 EIA Regulations 2017)

Dear Mr Thompson,

Conisbrough Parks Parish Council (the Parish Council) writes in response to the targeted consultation notice dated 4 March 2026, received pursuant to section 42(1)(a) of the Planning Act 2008 and Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations).

The Parish Council is the parish authority in whose area most of the proposed Whitestone 1 (W1) site is located and it has engaged consistently with this application since the first non-statutory consultation in November 2024. The Parish Council has a direct and material interest in the proposed development, its environmental impacts, and the adequacy of the pre-application process.

1. Preliminary Objection: Scope of This Consultation

The Parish Council notes the instruction in the consultation notice that responses should refer only to the numbered proposed changes and that feedback on the project as a whole will not be considered. The Parish Council formally objects to this limitation.

This notice is a statutory notice issued under s42(1)(a) of the Planning Act 2008 and Regulation 13 of the EIA Regulations 2017. Neither provision empowers the Applicant to restrict the scope of representations made by a prescribed consultee. The Parish Council is entitled, and in the discharge of its public duties is obliged, to raise any material consideration relevant to the proposed development that has arisen or changed since the statutory consultation of September to October 2025.

The Parish Council therefore provides responses to the proposed changes as far as the materials supplied allow, and raises below matters of legal and environmental significance that this Regulation 13 notice brings into focus. The Applicant is required to have regard to these representations and record them accurately in the Consultation Report.

2. Response to the Proposed Changes — Whitestone 1

The following responses are provided on the basis of the documents/maps received and the general descriptions in the notice.

Road works

The roads serving the W1 area — including those adjacent to Clifton and routes through Conisbrough Parks — are narrow rural lanes with limited passing capacity. The Parish Council raises the following concerns:

- Any hedge or vegetation trimming adjacent to or within the setting of Scheduled Monument SM1491751 (Romano-British Villa, Conisbrough Parks) requires a heritage impact assessment before works commence. Confirmation is required that this has been carried out and that the results will be included in the Environmental Statement.
- Temporary signage and speed limits are inadequate mitigation for HGV construction traffic at this scale. A Construction Traffic Management Plan specific to W1 access routes, prepared in consultation with the Parish Council, is required.
- The specific grid references and road names for all road works proposed in the W1 area must be provided directly to the Parish Council; they are not discernible from the maps alone.

Cable routes

The proposed changes create alternative cable route options rather than a single defined route, maintaining the indeterminacy previously identified as a fundamental flaw in the Rochdale Envelope in the draft Environmental Statement.

- Confirmation is required of whether any revised or alternative cable route options for W1 pass within the curtilage, setting, or buffer zone of SM1491751 or within the historic Conisbrough Deer Park boundary. This cannot be determined from maps alone without the accompanying environmental impact analysis, which was not supplied.
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Clerk to Conisbrough Parks Parish Council

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