Patron His Majesty The King

British Horse Society
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22/10/2025

Our Ref; 172/2025

Objection.

Planning Application. Whitestone Solar Farm
Applicant. Whitestone Net Zero Ltd.

Via e-mail. info@whitestonesolarfarm.co.uk

Dear Sirs,

I am responding to this consultation on behalf of The British Horse Society, an equestrian Charity which represents the 3.5 million horse riders and carriage drivers in the UK. The BHS is the largest and most influential equestrian charity in the country, working to improve the lives of horses and their owners through its four core foundations of education, welfare, safety and access. Nationally equestrians have just 22% of the rights of way network available to them. Increasingly disjointed by roads which were once quiet and are now heavily used by traffic resulting from development.

BACKGROUND TO OUR COMMENTS

Nationally, it is estimated that there are **3.5 million people** in the UK who ride or who drive a horse-drawn carriage. *The cost is calculated by the British Equestrian Trade Association to be £6,887 per horse, per annum there are currently* **4,308 passport registered horses** within the Whitestone solar farm postcode areas contributing **£29,669,196 (million) each year** to the local economy, mainly through goods and services supplied by small businesses such as feed merchants, vets, farriers, trainers, saddlers, etc. This substantial monetary contribution is at risk of being lost as horse owners could relocate to areas with safer more enjoyable off-road riding.

These horses are kept at both small and large livery yards as well as home owned farmsteads.

Road Safety *is a particular concern to equestrians, who are among the most vulnerable road users. Since 2010 the society's records show that there have been 15,496 road incidents involving horses in which* ***47 people and 636 horses were killed****. 1,686 people have been injured and 1,522 horses have been injured. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2024 alone,* ***2,470*** *horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (NHS Hospital Episodes Statistics).* Data source- *Hospital Admitted Patient Care Activity, 2023-24: External Causes*

[redacted]

The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see [redacted] – we recommend taking a few minutes to watch the 'Dead Slow' virtual reality film for an impression of how vulnerable equestrians are in proximity to cars and lorries).

British Horse Society is an Appointed Representative of SEIB Insurance Brokers Limited (Firm reference 479477) who are authorised and regulated by the Financial Conduct Authority.

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The objection submitted by the BHS to the first consultation submitted on the 02/01/2025 appears to have been completely ignored. As Rotherham Council's Public Rights of Way Map was offline for some time during the initial consultation period which has caused delays in finding relevant rights of way information required for responding, we ask that this consultation deadline be extended by one month, to 28th November 2025.

Whitestone 1. Consultation Booklet. Masterplan. Page 11.
The Revised Whitestone 1 Consultation booklet does not differentiate between public rights of way as previously requested, making it harder for the public to see how their local bridleways are affected by this current proposal.
A definitive map modification order application was submitted to Doncaster Council on the 20/06/2025 (BHS Reference DON-0044 Doncaster Council Reference ProwSch14_63). This application is for a bridleway leading from the A630 to join the Park Lane bridleway, this is shown as a potential access point on page 32 highlighted with a dark blue circle.
Footpath Conisbrough Parks-14 could be upgraded as part of the development to bridleway as it meets the junction of bridleway Conisbrough Parks-14 and Conisbrough Parks-4 Park Lane within the red line boundary.
Footpath Conisbrough Parks-16 appears to be partially within the red line boundary adjoining W1 23.
There are currently several DMMO applications being researched which will be submitted to Doncaster Council in due course. Conisbrough parks footpaths 14 and 16 are two of the applications.

We note that existing public rights of way and new permissive paths page 19 of the consultation booklet 1: indicates a 15m offset from either side of the paths or 30m in total we ask how these paths will be screened?
We note from page 19. Your quote below does not include horse riders this is discriminatory.
"we are proposing new permissive paths across the site (shown in the masterplan on pages 10-11). They would be available for walkers and cyclists throughout the lifetime of the project"

Substations W1 S1 AND WS S2 are currently shown as being located as adjacent to Park Lane bridleway this is unacceptable and would spoil the enjoyable, rural open aspect for all users of this bridleway.

Noted on page 28 Heading. Landscape and visual.
"This assessment considers residents within the local area, users of public rights of way and bridleways,"
It should be noted that a bridleway is a public right of way.

The first of the proposed permissive paths commences on Firsby Lane Bridleway and concludes on footpath Conisbrough Parks _3.
Cyclists currently cannot legally use footpaths however if this Permissive path was bridleway and footpath Conisbrough Parks-3 was upgraded to bridleway then cyclists, horse riders and pedestrians can all legally use it.

The second permissive path commences on footpath Conisbrough Parks-5 and concludes on footpath Conisbrough Parks-8 in effect creating a landlocked path for cyclist and horse riders. We would like to see all these paths within the red line boundary being made available to horse riders thereby meeting the requirements of National Planning Policy.

- **NPPF Para 105**: Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails

Whitestone 2. Consultation Booklet. Masterplan. Page 11.
Wickersley Footpath No.8B Route Code 42/8B/1 could be upgraded to bridleway status this would then form a useful link to second lane. We believe higher rights exist on Slacks Lane and that this should be upgraded to bridleway status. A DMMO application is currently underway (BHS Reference; ROT-0044)

Bridleway Thurcroft No.9 Route code 33/9/1 is within the development area leading from Long Lane. Disappointingly this is shown simply as an existing right of way which is confusing for the public to make meaningful responses to the consultation the key should differentiate between public rights of way.
An ORPA exists adjacent to W2 P3 (potential substation and BESS or solar panels) an application to record this as a Byway Open to all Traffic (BOAT) is underway and will be made to Rotherham Council in due course. This ORPA is not shown on the masterplan and we seek clarification as to how this route will be affected.
In the Anston Brook area immediately south of Burne Farm a potential permissive path is shown leading from the A57 to footpath Anston 5. Route Code 1/5/1 we ask that this route continues and joins Mill Lane, this permissive route could be a pleasant off-road bridleway for all non-motorised users.

There is an ORPA which appears to be partially within the boundary of W2 P2 leading from Morthen Lane along Well Lane, a DMMO application is currently underway which will connect this route to Bridleway Whistone No.27 Route Code 41/22/1. We seek clarification as to how this route will be affected.

Stocket Lane is a Bridleway (Whistone No.20 Route Code 41/20/1) leading from Morthen Lane to Penny Hill Lane which in parts will be affected by solar panels. This needs to be clearly marked on your plans as a bridleway to enable the public to make meaningful representation to this consultation.

There is a permissive off-road route shown around Penny Hill Lane, horse riders should be included in all the permissive routes within the red line boundaries thereby meeting the requirements of NPPF Para 105.

A DMMO application has been submitted to Rotherham Council (Ref Prow/C/67. BHS Reference ROT-0014) this application commences at Penny Hill Lane SK47998761 and concludes at Main Street SK46738756. W2 P4 is adjacent to this route we request further information, is this to be a substation or solar panels?

Whitestone 3. Consultation Booklet. Masterplan. Page 11.
Bridleway Harthill No.29 Route Code 18/29/1 and Bridleway Harthill No.16 Route Code 18/16/1 run through the development to the East of the M1 disappointingly these are simply shown as paths and not the correct legal definitive status, again not making it clear for the public to make meaningful consultation responses.

Woodall. An application to record a bridleway from Dowcarr Lane SK48118023 to Rotherham Road SK47947937 is underway. Local horse riders have used this route for many years and as such it should not be allowed to be subsumed within the development. Our reference ROT-0037.

Potential access points and crossings points have been noted and should not interfere or damage any of the public rights of way.

Failure to accommodate the needs of these users would be contrary to National and Local Planning Policies such as:

- **NPPF Para 105**: Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails
- **NPPF Para 96:** Planning policies and decisions should aim to achieve healthy inclusive lifestyles, especially where this would address identified local health and well-being needs-for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- **Defra circular 1/09 Rights of Way** *[1] advises that*
- *7.1 Proposals for the development of land affecting public rights of way give ride to two matters of particular concern: the need for adequate consideration of the rights of way before the decision on the planning application is taken…*

- *7.2 The effect of development on a public rights of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered.*

Any further vehicle intensification of this area will be detrimental to the public's enjoyment and safety. The potential for conflict between non-motorised public use and large vehicles on a regular basis throughout the day must not be underestimated. Should this scheme go ahead it is imperative that visibility and signage are improved on all access roads.

The British Horse Society believes that the proposals for the Solar Farm will create a huge loss of amenity to the public using the Rights of Way network affected by these plans. This loss of amenity must be mitigated by the Solar Farm Company, by creating other routes available to all non-motorised users. The impact on equestrians has been dismissed in the current plans and additionally takes no account of supressed demand. The scheme provides an opportunity to create new paths for cyclists, walkers and equestrians and links between the communities that are short of paths and links at present, these new routes should be permanent public rights of way and not just permissive routes that will disappear when the site is decommissioned.

Equestrians will lose the current rural aspects, effectively being sandwiched between fences, any proposed 'Reinforce/infill existing hedgerow with native species where necessary' will take some years to establish fully so the solar panels will be visible from all the Public Rights of Way. Public bridleways are precious vehicle free public resources for the public to obtain air and exercise in peace and safety in the countryside away from motorised vehicular traffic. Public Bridleways are a resource under increasing pressure from development in the countryside and their unique and beneficial nature should be protected at all costs for the public. **At all times in law public rights take precedence over private rights of access and development.**

The Applicant MUST take the following into account and should note that separate permission for works on or over a Public Right of Way MUST be requested from Doncaster or Rotherham Council's Rights of Way Team prior to any work commencing, and that permission may be refused. Any damage to a Public Right of Way resulting from works must be made good by the applicant. The applicant, and any future owners, residents etc, must have private rights to take motorised vehicles over a PRoW other than a BOAT. To do so without lawful authority is an offence under the Road Traffic Act 1988.

Closures without alternative routes should be avoided and, if necessary, construction traffic managed to reduce the length of closures, rather than an automatic blanket closure.

Should the above matters be dealt with satisfactorily we will remove our objection.

If you have any questions or would like to discuss any aspect of this response further, please do not hesitate to contact me.

Yours Faithfully,

[redacted]
Access Field Officer – Yorkshire
E-mail: [redacted]
Phone [redacted]
Mobile [redacted]