

## **Regeneration & Environment**

Riverside House  
Main Street  
Rotherham  
S60 1AE

E-mail: [Lisa.Brooks@rotherham.gov.uk](mailto:Lisa.Brooks@rotherham.gov.uk)

Email the Council for free @ your local library!

Our Ref:  
RB2025/0603

Please Contact:  
Lisa Brooks

Telephone Number:  
01709 254751

**23rd October 2025**

Lucy Freeman  
[lucy.freeman@dwd-ltd.co.uk](mailto:lucy.freeman@dwd-ltd.co.uk)

Dear Lucy

### **Proposed Whitestone Solar Farm – Development Consent Order**

**Notice pursuant to Section 42 Planning Act 2008: Duty to Consult on a Proposed Application, The Infrastructure Planning (Applications and Prescribed Forms and Procedure) Regulations 2009, The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.**

Thank you for notifying us of the Applicant's statutory consultation on the Scheme. Rotherham Metropolitan Borough Council (RMBC) acknowledges that the consultation period runs until 28 October 2025. We recognise the importance of engaging at this stage to help shape and influence the proposals before any application for a Development Consent Order (DCO) is submitted. RMBC therefore welcomes the opportunity to provide feedback.

This response reflects the level of detail available at this stage and does not constitute a full assessment of the local impacts of the proposed solar farm. If the DCO application is accepted for Examination, RMBC will submit a Local Impact Report (LIR) when invited, providing a comprehensive assessment of the scheme's local impacts.

RMBC also reserves the right to provide further detailed responses during the DCO process as more information becomes available. This is particularly relevant as this is the first opportunity the Council has had to review much of the detailed information contained in the Draft Environmental Statement. In some cases, technical assessments have yet to be undertaken. Additionally, while the Council intends to instruct professional external advice on certain technical matters, this has not yet been possible due to the Council's internal procurement procedures.

## Contents

Introduction .....	3
Biodiversity & Nature Conservation (Chapter 6).....	4
Landscape & Visual Impact Assessment (Chapter 7) .....	7
Cultural Heritage & Archaeology (Chapter 8) .....	13
Ground Conditions & Land Quality (Chapter 9).....	26
Water Resources & Flood Risk (Chapter 10) .....	30
Climate Change & Greenhouse Gas Assessment (Chapter 11) .....	31
Air Quality (Chapter 12).....	36
Traffic and Transport (Chapter 13).....	36
Noise & Vibration (Chapter 14) .....	38
Socio-Economics & Land Use (Chapter 15).....	39
Other Environmental Topics (Chapter 16).....	47
Cumulative Effects (Chapter 17) .....	47
Indicative Masterplans.....	47
Summary and Recommendations .....	48

## Introduction

As set out in your notification, Whitestone Net Zero Limited (the Applicant) intends to submit to the Planning Inspectorate an application for a Development Consent Order (DCO) for the construction, operation and maintenance and subsequent decommissioning of a solar farm. The development will be EIA Development pursuant to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The application, if accepted, will be Examined by the Planning Inspectorate and a recommendation will be made to the Secretary of State for Energy Security and Net Zero. The council's consultation response has been informed by the documents provided on the website: [Document Library - Whitestone Solar Farm](#), which include the following:

- Statutory consultation leaflet
- Statement of Community Consultation
- Consultation booklet for:
  - Whitestone 1
  - Whitestone 2
  - Whitestone 3
- Illustrative Masterplans, including:
  - Whitestone 1
  - Whitestone 2
  - Whitestone 3
  - The whole project over 8 slides
- The Draft ES, including:
  - The Non-Technical Summary
  - The Non-Technical Summary Appendix Figures
  - Draft ES Volume 1
  - Draft ES Volume 2 - Figures
  - Draft ES Volume 3 – Appendices

The Scheme, which includes areas within Rotherham and Doncaster's administrative areas, will principally consist of the elements below:

*“The Proposed Development involves the construction, operation and maintenance, and decommissioning of approximately 750 megawatts (MW) of solar photovoltaic (PV) array, Battery Energy Storage System (BESS), onsite substations and supporting infrastructure, and grid connection infrastructure.”*

The extent of the Proposed Development (the Proposed Order Limits) comprises a total area of approximately 1914 hectares (ha), consisting of approximately 543 ha proposed for the underground cables (the Cable Corridor Options), and 1,371 ha proposed for the Solar Photovoltaic (PV) array and associated infrastructure, BESS, substations, and landscaping and habitat enhancement (the Site).

At this stage of design, approximately 484 ha have been identified for landscaping and biodiversity mitigation / enhancement.

Indicative masterplans have been provided, however it is important to note that the design of the scheme has not been fixed at this stage of the proposals. It should also be highlighted that the Council's opinion could change should additional receptors and potential impacts be identified as the project is further refined.

Overall RMBC acknowledges the need to increase renewable energy generation and on 30<sup>th</sup> October 2019 declared a climate emergency. Notwithstanding this, RMBC would like to record that in general terms it remains concerned at the number of proposals coming forward incrementally for solar farms of varying scales across its administrative area, particularly in areas that are intrinsically rural and less well connected in terms of supporting infrastructure.

In the meantime, RMBC wishes to highlight the following key comments in detail below:

### **Biodiversity & Nature Conservation (Chapter 6)**

It is noted that for Volume 1 Chapter 6 Biodiversity and Nature Conservation, that the designated local wildlife sites included on the adopted Policies Map and within the zone of influence, have not all been considered. No explanation is provided within the draft ES as to why this is the case. This issue will need to be rectified in the submission ES although at that stage there will be no opportunity for RMBC to consider the impacts arising for these Local Wildlife Sites. This is a major omission and significantly impacts the quality of the draft ES.

The Environmental Statement Masterplans need to consider the emerging Local Nature Recovery Strategy (LNRS), seeking natures recovery, and making areas for nature bigger, better and more joined up. The solar farm NSIP proposals will significantly change the landscape and natural environment of this Borough. It is imperative therefore that all appropriate planning policies, allocations and designations included on Rotherham's Local Plan Policies Map are appropriately considered, as Local Wildlife Sites (LWS) will be one of the building blocks for opportunity areas for nature's recovery in the emerging LNRS.

A review of national energy policy notes and recent planning appeal decisions for solar farm proposals, identifies the limitations of objecting to renewable energy proposals, given the Governments stated intention for net zero to be achieved by 2050. It is recognised that potentially and with a positive approach to enabling nature's recovery, the NSIP Solar Farm proposals, provide great opportunities for embedding the principles of enhanced land management practices for the benefit of nature and for a coherent approach to placing green infrastructure at the forefront of these proposals can be achieved.

The protection of existing and creation of more wildlife corridors and areas supporting nature's recovery; promoting the principles of the Rotherham Biodiversity Action Plan, specific to site; and opportunities for developing further sensitive routeways linking the existing recreational rights of way network through linear corridors for biodiversity enhancements as well as providing access to natural greenspace for recreational purposes and improving the nation's health.

The building of solar arrays within designated local wildlife sites including Brampton Common, and abutting other LWS sites, is not supported. It appears that, at this draft ES public consultation stage, there has been insufficient consideration of the details of

mitigation of the negative impacts, and the likely compensation required, arising from the loss of this LWS.

It is noted that details are to be provided, in an outline Biodiversity and Environmental Management Plan, for submission to the Secretary of State, by the applicant in due course. However, there is great concern, given the current lack of habitat management details and mitigation proposed, during this public consultation stage, that the Council and other stakeholders, has no opportunity to influence the applicant's response to such losses. It is noted that local ornithologists are also concerned by the lack of details within the draft ES, and these comments have been provided under separate cover.

The inclusion of Brampton Common LWS within the NSIP project is not supported as no evidence is provided regarding potential mitigation arising from the destruction of the current habitat within hedgerow boundaries. The solar arrays should be removed from this parcel, and this should be an area for mitigation for the wider scheme parcels within WS2.

It is concerning that the Non-Technical Summary does not recognise the implications of not fully considering all designated Local Wildlife Sites included within the Policies Map.

There are also designated Tree Preservation Orders (not LWS) that have not been considered. This omission should also be rectified.

The loss of the Brampton Common LWS is significant to the series of Local Wildlife Sites within this Borough, but this is stated as not significant in the Non-Technical Summary (NTS). Habitat Enhancement and Mitigation Plans have not been shared and therefore the applicant cannot claim this is not significant at this stage as the actions to be undertaken at a future date, are unknown to the Council and other stakeholders. The comments of a local BT Ornithology Recorder have been made known to the Council.

There are concerns regarding the proposed substation and cabling at W2P1 and its impact on the SM Blue Mans Bower, the watercourse and the LWS36 Whiston Meadows, the River Rother, Ulley Brook and Whiston Brook. The potential for pollution of watercourses is greatest where proposals are in close proximity to such receptors.

Rother Valley Country Park has a LWS within its boundary.

There was a Great Crested Newt Translocation Licence at Maltby Brickworks that has not been noted, LWS58 and 59 and RIGS 32 where cabling CR1b is proposed. I am however uncertain of the current status of such a licence.

Sheep grazing is noted in the draft ES. This is not supported in this Borough and may have even greater negative impacts in destroying or preventing the creation of habitat enhancements within solar arrays. The long-term management of the land within the solar arrays and the provision of wide field margins to hedgerows/ trees/ ditches and the creation of scrapes and the creation of ponded areas within the solar arrays all need to be considered. These details are currently not available for review and discussion with local stakeholders and local communities.

Macro organisms (visible to the naked eye) include:

- Earthworms – Improve soil structure and nutrient cycling.
- Insects – Beetles, ants, and termites help decompose organic matter and aerate soil.
- Arachnids – Such as spiders and mites, which are predators of other soil organisms.
- Micro organisms (microscopic life)
- Bacteria – Essential for nutrient cycling (e.g., nitrogen fixation, decomposition).
- Fungi – Including mycorrhizal fungi that form symbiotic relationships with plant roots.
- Protozoa – Single-celled organisms that feed on bacteria and help regulate microbial populations.
- Nematodes – Microscopic worms, some of which are beneficial, while others are plant parasites.

The Council do not recall seeing reports within the ES on the impact of metal stands to 4 metres depth and shading of the soils for a significant period of time, therefore if this information is not currently available, it should be provided within the final documentation.

### Recommendations

That the solar arrays proposed for LWS027 Brampton Common are removed and this LWS site is used for habitat enhancements for WS2 given its current local wildlife designation status.

That the “confidential” badger report and all species/ bird surveys and GIS mapping is provided to the Biological Records Office for review.

That the NTS is re-drafted to clarify all points raised regarding designated LWS.

That a Soil Assessment is carried out and the applicant commits to following best practice principles set out in the Council’s adopted Soils Supplementary Planning Document to minimise impacts from construction and the creation of hardstanding for roads and tracks and to remove/replace soils within field boundaries/ the wider local area where possible.

That the RBAP is consulted in the preparation of habitat creation and habitat enhancement plans specific to site including, ponds, scrapes, ditches, hedgerows, tree planting, and the use of natural landscaping to ensure secured by design principles can be achieved, limiting the use of intrusive fencing and cameras in the open countryside.

That the oBEMP is shared with the two local authorities and discussions are entered into before submission to the Secretary of State for Energy.

It is essential that long term management and maintenance of any habitat creation including, habitat and species surveys, are carried out over the lifetime of the project if there are to be positive enhancements to biodiversity and nature’s recovery. It is

anticipated that the results of all survey work undertaken will be submitted to the local authority or agreed successor body for inclusion with the Enhanced Biodiversity Duty Reports and for the monitoring of the LNRS over time. This is a significant change to current land management practices within open countryside (Green Belt) and such changes, both beneficial and negative, need to be regularly monitored and remedial action taken where this is necessary. This is the approach taken within BNG areas and Habitat Banks. It is only if such agreements are placed on the DCO that the possible benefits of a significantly sized solar farm can be achieved.

That a proportion (minimum of 50%) of the Community Fund is provided to RMBC and other appropriate organisations (e.g. the Local Wildlife Trusts of SRWT/YWT) or successor bodies, to administer for the enhancement of local wildlife sites within this Borough and achieving the aims and objectives of the LNRS once adopted and other Strategies and Plans (including the Rotherham Local Plan) of the Council.

### **Landscape & Visual Impact Assessment (Chapter 7)**

The Council is in the process of commissioning a specialist landscape consultant team to undertake a comprehensive review of the submitted LVIA and ES and therefore the Council reserves the right to provide additional detailed comments on the LVIA process at a later stage in the consultation process.

The aim of the following comments are to identify any key issues, errors or omissions in relation to the landscape and visual baseline, the proposed assessment Methodology, and the criteria used in the Draft ES and LVIA to date; And to make comment on mitigation proposals. The following comments on visual effects focus on locations where the most significant effects are likely to be experienced.

In preparing these comments regard has been had to the following relevant submission documents:-

- Draft ES – Volume 1 - Chapter 5 The proposed Development
- Draft ES – Volume 1 - Chapter 7 Landscape & Visual Impact Assessment
- Draft ES – Volume 2 – Figures 7.1 to 7.5.6
- Draft ES – Volume 2 – Figures 7.6.1 to 7.6.58 Viewpoint photography
- Draft ES – Volume 2 – Figures 17.1 to 17.3 Cumulative effects
- Draft ES – Volume 3 – Appendix 7.2 – Landscape and Visual Impact Assessment (LVIA) Methodology.
- Draft ES – Volume 3 – Appendix 7.3 – Landscape Character Baseline and Assessment.
- Draft ES – Volume 3 – Appendix 7.4 – Representative viewpoint Assessment.

and the following industry guidance:-

- Guidelines for Landscape and Visual Impact Assessment 3<sup>rd</sup> edition 2013 (GLVIA3).
- Landscape Institute Technical Guidance Note 1/20 (TGN1/20) (10<sup>th</sup> January 2020).

The following Scoping Opinion responses are noted:

- ZTV eye level observer height has been amended to 1.6m high

- Local landscape character areas outside of the study should be included within the LVIA and not scoped out.
- Additional Viewpoints requested at scoping stage are now included and viewpoints 38 and 54 have been reinstated.

VP ref	Area	Location
38	W2	Southwest of Thurcroft and east of Brampton en le Morthern
54	W3	Norwood area

- Errors and inconsistencies in identified Landscape Character Area descriptions now rectified apart from Local Landscape Character area 4 Don Valley Floor is referred to as Don Valley North in Figure 7.4.1 and throughout draft LVIA.
- Planning policy context updated to include reference to RMBC Sites and Policies document and Trees SPD.
- Reference to AHLV omitted as this is no longer a local landscape designation. The Draft Environmental Statement is based on the Rotherham Local Landscape Character Assessment 2010 and Rotherham Landscape Capacity study 2015.

#### Methodology - Landscape character baseline

Following a review of the landscape methodology and criteria for assigning landscape value, landscape susceptibility and landscape sensitivity it is accepted that these are in line with GLVIA 3. The application of the value, susceptibility and resultant landscape sensitivity, has been clearly presented with justification and reasoning given for each assessment.

#### Landscape sensitivity

Rotherham Local Landscape Character Areas		RMBC published Landscape character sensitivity	Whitestone sensitivity assessment
4	Don Valley Floor	Moderate	Scoped out due to limited effects
5a	Coalfield Tributary Valleys - Thrybergh	Moderate - High	Medium – High
5b	Coalfield Tributary Valleys - Treeton	Moderate	Medium
5c	Coalfield Tributary Valleys - Canklow	Moderate	Medium
6	Rother Valley Floor	Moderate	Medium
7	Rother Valley reclaimed Woodland	Moderate	Medium - High
8	Central Rotherham Coalfield Farmland	Moderate - Low	Medium
9a	East Rotherham Limestone Plateau	Moderate	Medium
9b	East Rotherham Limestone Plateau - Maltby Colliery	Moderate	Low - Medium

11	Ryton Farmlands	Moderate	Scoped out due to limited effects
----	-----------------	----------	-----------------------------------

GLVIA guidance states that where existing Landscape character and capacity assessments exist that these should be used. Where there is any departure from the existing sensitivity assessments then clear justification should be given. For the most part the applicant's assessment of sensitivity reflects that of the published sensitivity for the Landscape character area (LCA). In the two highlighted LCA's above, the applicant's assessment of sensitivity differs from the published sensitivity. For LCA 7 this has resulted in a higher sensitivity score and for LCA 9b a lower sensitivity. The applicant has provided a clear explanation for the sensitivity assessments given.

#### Assessment / criteria for Magnitude of change

The applicant's criteria for Landscape magnitude of change is given below. Concerns are raised over the limited description provided for each criteria. Only, the High criteria includes any descriptor for duration and reversibility, when duration of effects and reversibility should be considered for all magnitudes of change. The Council ask that additional detail be added to the criteria table, so that it is clearer what each level of magnitude of change may comprise. For example, a High magnitude of change could include either / both a substantial change in landscape characteristics such as large scale loss of existing landscape features/ characteristics, or introduction of new large scale features (fencing and solar arrays) which detract from the existing landscape character area. GLVIA section 5.49 page 90 describes this as the effect of both loss of existing features and the introduction of additional features.

**Table 7.2.4 – Landscape Magnitude of Change**

Typical criteria	Rank
A substantial change in landscape characteristics and/or over extensive geographical area and/or which may result in an irreversible landscape impact.	High
A moderate change in landscape characteristics and/or which may occur over a large geographical area.	Medium
A small change in landscape characteristics and/or which may be over a relatively localised geographical area.	Low
A barely perceptible change in landscape characteristics and/or which is focused on a small geographical area.	Negligible

#### Landscape effects

The most significant landscape effects appear to be experienced within LCA 8 which hosts most of W2, and W3 along with a significant proportion of the proposed cable runs. LCA 5b also includes part of W2 and some cable runs. LCA 7 includes a small part of W3, and LCA 9a includes some cable runs.

In reviewing the draft landscape effects, at this stage there appears to be a lack of detail in respect of the description of effects as a result of the introduction of the solar panels and fencing will have on the landscape character areas. This may be due to the fact that the exact location of the solar arrays and fenced parcels is not yet fixed at this draft stage. The Council would expect more detailed description of the urbanising effects of the introduction

of such industrial features within the landscape to be provided and for this to be considered closely in the final assessment of magnitude of landscape effects.

### Methodology – Visual Baseline

The ZTV study is a key tool in establishing the scope of study and selection of viewpoints. The scoping study has already established the scope of the study at 3km and a total of 68 viewpoints have been identified, including additional viewpoints requested during earlier consultation at the scoping stage. Nine viewpoints are reported to have been scoped out due to either no visibility being predicted from the location, or the viewpoint being relocated or combined with another adjacent location.

### Viewpoint Photographs

The following issues or notable omissions were identified within the viewpoint photography. It may be that viewpoints 61-67 are recently added viewpoints following the scoping stage and so there has been no opportunity as yet to record winter photographs. This should be addressed before the ES is finalised for submission in the spring.

<b>Figure Ref no</b>	<b>Viewpoint Ref</b>	<b>Comment</b>
Figure 7.6.3a	Viewpoint 3	winter/ summer photographs are taken from a slightly different location or angle.
Figure 7.6.52	Viewpoint 61	No winter Photography provided
Figure 7.6.53	Viewpoint 62	No winter Photography provided
Figure 7.6.54	Viewpoint 63	No winter Photography provided
Figure 7.6.55	Viewpoint 64	No winter Photography provided
Figure 7.6.56	Viewpoint 65	No winter Photography provided
Figure 7.6.57	Viewpoint 66	No winter Photography provided
Figure 7.6.58	Viewpoint 67	No winter Photography provided

### Visual Sensitivity

Visual sensitivity is a combination of visual susceptibility to change, and the value placed on the view. How susceptible to change a viewpoint is, can be described by the occupation or activity of people experiencing the view at a particular location and the extent to which their attention or interest may be focussed on the views.

The value placed on a view should include consideration of recognition of value as a result of heritage assets, planning designations, indications of value attached by visitors, such as inclusion in guidebooks, or on tourist maps, provision of facilities. The applicant has set out within their methodology a three-point scale for Visual susceptibility and visual value. These are combined to give a further 3-point scale for Visual Sensitivity.

**Table 7.2.7 – Visual Sensitivity Typical Criteria**

Typical Criteria	Classification
Typically, individuals with an interest or appreciation of the views, and experience views across highly valued landscapes, or promoted routes or lookouts, or associated with cultural aspects	High
Typically, individuals' people with general interest in appreciation of views, e.g. private views or those looking over medium valued landscapes or those walking along public rights of way	Medium
Typically, individuals whose interest or appreciation of views is secondary to their activity such as outdoor workers, those engaged in sport or those looking over landscapes with low value.	Low

### Visual Effects

The applicant sets out a Draft summary of Visual Effects in Table 7.4.2. A summary of these is given below to identify the 11 locations where significant adverse visual effects will be experienced during construction and within the first year of operation. Of these 11 viewpoints listed in the table below, 7 locations will see the magnitude of effect reduced as a result of mitigation planting after 15 years. In the 4 locations highlighted in blue no reduction in significant effect will be realised by the current proposals.

VP ref	Area	Location	Visual effect
4	W1	PROW and Clifton	<b>Construction:</b> Moderate to Major Adverse (significant). <b>Operation yr1:</b> Moderate to Major Adverse (significant). <b>Operation yr 15:</b> Moderate Adverse (significant).
22	W2	PROW along the A57	<b>Construction:</b> Moderate to Major Adverse (significant). <b>Operation yr1:</b> Moderate to Major Adverse (significant). <b>Operation yr 15:</b> Moderate Adverse (significant).
35	W2	Second Lane, east of Wickersley	<b>Construction:</b> Moderate to Major Adverse (significant). <b>Operation yr1:</b> Moderate to Major Adverse (significant). <b>Operation yr 15:</b> Moderate to Major Adverse (significant).
37	W2	PROW at Slacks Farm, Wickersley	<b>Construction:</b> Moderate Adverse (significant). <b>Operation yr1:</b> Moderate Adverse (significant). <b>Operation yr 15:</b> Moderate Adverse (significant).
39	W2	PROW South of Ulley	<b>Construction:</b> Moderate Adverse (significant). <b>Operation yr1:</b> Moderate Adverse (significant).

			<b>Operation yr 15:</b> Minor to Moderate Adverse (Not significant).
40	W2	Stoket Lane	<b>Construction:</b> Moderate to Major Adverse (significant). <b>Operation yr1:</b> Moderate to Major Adverse (significant). <b>Operation yr 15:</b> Moderate Adverse (significant).
44	W3	Bridleway south of Field Lane, Upper Whiston	<b>Construction:</b> Moderate Adverse (significant). <b>Operation yr1:</b> Moderate Adverse (significant). <b>Operation yr 15:</b> Minor to Moderate Adverse (Not significant).
47	W3	Users of Cuckoo Way	<b>Construction:</b> Moderate to Major Adverse (significant). <b>Operation yr1:</b> Moderate to Major Adverse (significant). <b>Operation yr 15:</b> Moderate Adverse (significant).
48	W3	Bridleway south of Kiveton Community Woodland	<b>Construction:</b> Moderate to Major Adverse (significant). <b>Operation yr1:</b> Moderate to Major Adverse (significant). <b>Operation yr 15:</b> Moderate to Major Adverse (significant).
59	W2	Rotherham round walk at Spa Hill.	<b>Construction:</b> Moderate to Major Adverse (significant). <b>Operation yr1:</b> Moderate to Major Adverse (significant). <b>Operation yr 15:</b> Moderate to Major Adverse (significant).
60	W3	PROW at Walseker Lane	<b>Construction:</b> Moderate to Major Adverse (significant). <b>Operation yr1:</b> Moderate to Major Adverse (significant). <b>Operation yr 15:</b> Moderate to Major Adverse (significant).

The applicant sets in their Table 7.4.2 that further design reviews will be carried out to reduce the likely significant effects where possible. At this stage the Council do not yet have final detail of the solar arrays, final cable run location or final Battery storage / substation locations. The LVIA will need to be reviewed and refined and updated once this information is known.

At what stage in the process will the final site layouts be known in terms of extent of solar panels, final locations of battery storage facilities and final locations of substations? These final locations of these should be informed by the assessment of effects and should be sited in the least visually intrusive locations.

## Mitigation

There is an expectation that landscape and visual mitigation will include planting in key locations to screen views of the development. There is an opportunity to deliver enhancement across LCA 8 and other most effected local landscape character areas through the restoration and gapping up of existing hedgerows and field boundaries. This approach is in line with broad Landscape Character Area Management Strategies. Refer to SP32 Green Infrastructure and Landscape Policy Table 14. These Management Strategies are based on the condition and strength of character of the Local Landscape Character Areas. Further detail is provided in the Rotherham Landscape Character Assessment and Landscape Capacity Study (2010; paragraphs 3.12 -3.14 and Figure 8).

Mitigation proposals must do more than focus only on Biodiversity Net Gain. Any opportunities to reinforce and repair existing hedgerow field boundaries should be taken. Mitigation proposals must identify where planting is performing a visual screening or landscape mitigation as its primary function.

Whilst it is understood that national character areas have been scoped out of the ES, consideration needs to be given to these and in particular the locations of limestone plateau areas in order that both soil strategy and species selection for mitigation are appropriate and reflect the underlying soil geology and maintain the natural existing natural pH.

How will the urbanising effects of this large-scale development be mitigated and compensated for within the most adversely effected local communities? Are there any proposals to include community grants as part of this development?

## Photomontages

The Council would appreciate the opportunity to be consulted on and agree the locations for photomontage visualisations for this development. Photomontages should be provided for each of the site parcels W1, W2 and W3 from a range of representative viewpoints demonstrating a range of effects not just those which are significant. This would also help the local communities understanding of the nature of the effects. These should also clearly show the effects of proposed mitigation where this has a key role in reducing effects.

Photomontage locations should include viewpoints where sub-stations and BESS will feature in the view also. Consideration of colour options of fencing and BESS units should also be set out and the least intrusive, most recessive colours selected. Fencing within the countryside itself has a visual impact and wherever possible natural vegetation screening should be used.

## **Cultural Heritage & Archaeology (Chapter 8)**

The following comments are split into three sections, relating to each part of the Whitestone project. The setting of designated heritage assets outside of Rotherham Borough are not referenced and the comments collectively refer to the entire development as 'the solar farm' which includes all the elements including the proposed battery storage facilities, substations as well as associated infrastructure, unless specifically identified a specific part of the development.

The key designated heritage assets affected by the proposals have been identified. The following comments, in some instances discuss the impact on designated heritage assets where the impact would be low or non-existent, as it is necessary to clarify the reasoning. Designated heritage assets that are completely unaffected by the proposals have not been identified.

These comments will overlap with landscape comments and will need to be fed into the submitted Landscape Visual Impact Assessment (LVIA), though the comments are made entirely from an historic environment perspective. It is expected that the LVIA and Heritage Statement would be closely linked and would inform each other, as this is necessary to assess the impact on the setting of the designated heritage assets identified.

These comments are restricted to designated heritage assets and a candidate site for the South Yorkshire Local List. It has not been possible to fully assess the impact on the setting of undesignated heritage assets, though this will be carried out at a later stage when more information is available.

Whitestone 1:

The majority of Whitestone 1 falls outside of the Borough. The most sensitive designated heritage assets within this section of the Borough are clustered in the villages of Hooton Roberts, Ravenfield and in the hamlet of Firsby.

#### Hooton Roberts

Hooton Roberts is a small historic village which has seen little growth from the C20th onwards. As such, it enjoys a largely unspoilt rural setting, albeit on the A630 road, which is one of the main roads between Rotherham and Doncaster.

In spite of its historic appearance, Hooton Roberts does not have a Conservation Area. The designated heritage assets affected by the proposals are identified below:

- Hooton Roberts Rectory Grade II listed. This property is located within the centre of the village of Hooton Roberts, as the Whitestone solar farm is located some considerable distance to the west, it is considered that its setting is not significantly affected.
- Church of St John The Baptist Grade II\*. This Church has a relatively low tower and is situated on land higher than the adjacent A630 and the neighbouring Earl of Strafford public house. Due to the relatively low height of the tower it is not a prominent landscape feature, though is clearly visible within wider views in the surrounding countryside. It is noted that the land slopes to the west, where the solar farm would be located.

Concerns are raised about the wider setting to the west from the proposed solar farm. The larger solar arrays would have a significant, though less than substantial impact on the setting of this Grade II\* listed building from views to the west. It is concluded that the harm to the setting of this Grade II\* listed building would be less than substantial.

- The Earl of Strafford Public House Grade II listed. This property is located within the centre of the village of Hooton Roberts, as the Whitestone solar farm is located some considerable distance to the west, it is considered that its setting would not be adversely affected.
- The Coach House approximately 20 metres to the south of the Earl of Strafford Grade II listed. This property is located within the centre of the village of Hooton Roberts, as the Whitestone solar farm is located some considerable distance to the west, it is considered that its setting is not affected.
- Barn approximately 35 metres to the southeast of Church of St John the Baptist Grade II listed. This barn is located within the centre of the village of Hooton Roberts, with a nursery to the southeast with open fields further to the south and southeast. Due to the height of the barn, it does not appear prominently within wider public views within the surrounding area. The proposed solar arrays would lead to some degree of harm to the wider setting of this Grade II listed building, though this harm would be relatively low and less than substantial harm.

#### Firsby

- Barn fronting onto bridle path on east side of Firsby Hall Farmyard Grade II listed. The listed building enjoys a rural location which greatly enhances its setting. It is noted that the solar arrays would be located at some distance to the north and east with potential landscape mitigation and enhancement areas immediately adjacent.

There is clearly significant potential to improve the immediate setting of this Grade II listed building in this enhancement areas as well as blocking views of the solar arrays. It is considered that the immediate setting of this Grade II listed building could be preserved and potentially enhanced. However, visual harm would occur to the wider setting and from long range views to and from this Grade II listed building, this harm would be less than substantial.

- Garden Wall with pedestrian entrance archway fronting onto bridge path on East side of Firsby Hall Farm Grade II listed. The listed building enjoys a rural location which greatly enhances its setting. It is noted that the solar arrays would be located at some distance to the north and east with potential landscape mitigation and enhancement areas immediately adjacent.

There is clearly significant potential to improve the immediate setting of this Grade II listed building in this enhancement areas as well as blocking views of the solar arrays. It is the Council's opinion that the immediate setting of this Grade II listed building could be preserved and potentially enhanced. However, visual harm would occur to the wider setting and from long range views to and from this Grade II listed building, however due to the relatively small size of this listed building would be limited and relatively minor.

- In the hamlet of Firsby is a candidate for the South Yorkshire Local Heritage List, Firsby Lane, Bridge, Firsby. Though this bridge does not currently benefit from a designation on the Local List its inclusion is imminent. At the present time it is an undesignated heritage asset. However, owing to the small size of the bridge and

the fact that it is largely surrounded by landscape mitigation, it is not envisaged that any harm to its setting would arise.

### Ravenfield

There are a number of designated heritage assets within the village of Ravenfield along with the Ravenfield Conservation Area.

Due to the distance to the proposed solar farm, the impact on setting is considered collectively.

The following listed buildings and their setting are considered together, due to their close visual and historic association:

- Farmbuilding approximately 140 metres to north of Ravenfield Hall Farmhouse Grade II listed
- Enclosure wall to north of Ravenfield Hall Farmhouse with attached farmbuildings at south end of east side Grade II
- Stable Block approximately 40 metres to north east of Ravenfield Hall Farmhouse Grade II
- Entrance Gateway and attached railings to Ravenfield Hall Farm

These important grouping of listed buildings that formally related to the now demolished Ravenfield Hall are located on land sloping upwards from Ravenfield Ponds and the hamlet of Firsby. The solar farm would be located at a significant distance to the west and would be clearly visible within their wider setting to the west. It is considered that the proposed solar farm would lead to harm to the wider setting of these designated heritage assets, though this harm would be less than substantial.

- Church of St James Grade II\* listed building. The Church of St James is a small Parish Church designed by the prominent architect John Carr. It is located to the northeast of Ravenfield village within open countryside, which increases its visual prominence within the wider landscape.

The solar farm would be located at a significant distance to the west and would be clearly visible within the Church's wider setting when viewed to the west. It is considered that the proposed solar farm would lead to less than substantial harm to the setting of this Grade II\* Listed Building.

There are a number of listed buildings within the village of Ravenfield, however, these are located within the village and it is considered that their setting would not be affected by the proposed solar farm.

Ravenfield Conservation Area enjoys a rural setting, which greatly enhances its character as a small and relatively unspoiled historic village. The solar farm would be located at a significant distance to the west and would be clearly visible within certain parts of the Conservation Area and impacts on its wider setting to the west. It is

considered that the proposed solar farm would lead to harm to the wider setting of the Conservation Area, though this harm would be less than substantial.

### Whitestone 2:

Whitestone 2 falls entirely within the Borough. The main settlements affected are Aston, Wickersley, Brampton-en-le-Morthen, Thurcroft, Ulley, Treeton, Laughton Common and North Anston.

#### Aston

The proposed solar farm is located at some distance to the north of the village of Aston. The Aston Conservation Area abuts open countryside to the north. The designated heritage assets affected are as follows:

- The Aston Conservation Area abuts open countryside to the north. The solar farm is located some distance to the northwest and further to the north of the Conservation Area to the south of the village of Ulley. It is considered that the impact on the setting of the Aston Conservation Area would be low.

#### Wickersley

The part of the solar farm closest to Wickersley is located to the southwest of Morthen Road in countryside between the south of Wickersley and the M1 motorway.

It is considered that due to the nature of the settlement the Wickersley Conservation Area and the large number of listed buildings within Wickersley would not be affected by the proposal and their setting would be unaffected. The only listed building affected would be as follows:

- Barn adjoining west end of Moat Lane Farmhouse Grade II. The proposed solar farm would be located to the west of this listed building. Views from the west to this listed building are largely obscured by Moat Farmhouse, however, large sections of the listed barn remain visible within wider views to the west, though not prominent.

The proposed solar farm is considered to have little impact on the wider setting of this listed building.

#### Brampton-en-le-Morthen

The hamlet of Brampton-en-le-Morthen contains a high concentration of listed buildings and almost entirely falls within a Conservation Area. Brampton-en-le-Morthen is largely a collection of farms centred around Brampton Road and to a lesser extent Toad Lane in a relatively close arrangement. The listed buildings to the north of Toad Lane are considered not to be affected by the solar farm.

With regards to the grouping of listed buildings to the south mainly centred around Manor Farm and Townend Farm, it is noted open countryside would remain with buffer areas of potential landscape mitigation and enhancement proposed, that could significantly enhance the setting of these groupings of listed buildings and the Brampton-en-le-Morthen Conservation Area.

Due to the distances to the solar farm to the south and the presence of these landscape mitigation and enhancement areas it is considered that any harm to the setting of these listed buildings or to the Brampton-en-le-Morthen Conservation Area would be low, however, this would need to be demonstrated through the submission of the LVIA and heritage statement, photomontages would also be necessary to be prepared to be able to fully assess the visual impact on setting.

#### Thurcroft

It is considered that no listed buildings or locally listed buildings are affected by the proposals in Thurcroft.

#### Upper Whiston

It is considered that only listed building affected by the proposals is The Heights Farmhouse, Upper Whiston Lane, Grade II. The proposed BESS/Substation or Solar arrays to the west of this property have the potential to harm the wider setting of this Grade II listed building.

#### Guilthwaite

It is considered that no designated heritage assets are affected by the proposals for Guilthwaite.

#### Whiston

The main concentration of listed buildings and Whiston Conservation Area are contained in the historic centre of Whiston, which is largely surrounded by C20th housing. Due to the distance of the proposals from Whiston Conservation Area it is considered that any harm to its setting would be low. The designated heritage assets affected are as follows:

- The Grade II\* Church of St Mary Magdalene. This important Church does not enjoy great visual prominence within the wider landscape. Though is on the edge of the village close to attractive open countryside to the south and east that greatly enhances its setting. The proposals for the solar farm are located at some distance away to the south of the M1 and to the east of Pleasley Road. It is considered that though there is potential for harm to the wider setting of the Church, due to its lack of prominence and from the submitted information, the impact would be very minor harm at worst to neutral at best, to its wider setting.
- Blue Man's Bower Scheduled Ancient Monument. This important Scheduled Moated Site is located on flat land to the southeast of Whiston in the Rother valley, the surrounding land is open and exposed. The proposed solar farm and in particular the greater visual impact of the proposed substation adjacent J33 of the M1 and to a lesser extent the potential substation at Brinsworth B, to the west of Long Lane have the potential for substantial harm to the setting of this Scheduled Ancient Monument.

The immediate setting of Blue Mans Bower remains rural which greatly enhances and preserves its setting. Though the M1 and the A630 harm its wider setting, the presence of the raised A630 screens the existing Brinsworth substation from views from the site. The proposed substation extension to the east of the A630

would substantially harm the wider setting of this Scheduled Ancient Monument and coupled with the proposed substation to the east of Long Lane would lead to at worst substantial harm and at best less than substantial harm at the higher end.

Further survey work would need to be carried out to ascertain the full visual impact and harm to this Scheduled Ancient Monument. However, at the present time concern is raised about the visual harm to the setting of this site.

### Treeton

The village of Treeton is highly distinctive in the Borough sitting on a hill within the wider landscape. This gives prominence to the village but also to the Tower of the Grade I listed Church of St Helen. Though the Conservation Area like many others in the Borough is surrounded by C20 & C21 housing so the visual impact on setting is low. The designated heritage assets affected are as follows:

- The Grade I listed Church of St Helen with its unusual tower, constructed of contrasting ashlar limestone to the upper stages, enjoys greater visual prominence within the wider landscape due to being located on the highest point of the village, with the village being constructed on high land within the surrounding landscape. The proposed solar farm to the west would directly impact on the wider setting of the village when viewed from the west and north, diminishing the rural setting to this side of the village. It is considered that the harm to the setting of the Grade I listed building is less than substantial.
- Farmbuilding at Spa House Farm Approximately 12 metres to the southwest of Farmhouse Grade II listed. The proposals include a large area of solar arrays close to the east of this Grade II listed building. It is therefore considered this close proximity to the listed building along with the lack of landscape mitigation and enhancement would directly harm its setting, by “industrialising” the wider landscape and removing the rural context of this historic farmstead. The harm due to proximity is substantial and as such significant concerns are raised.
- Farmbuilding at Spa House Farm approximately 35 metres to north of farmhouse Grade II listed. This listed building forms the northwestern boundary of this grouping of agricultural buildings at Spa House Farm. Its visual prominence is greater in the public realm due to the presence of a public right of way directly adjacent. The close proximity of the solar farm to this Grade II listed building, and in particular its proximity to public views, would lead to substantial harm to its setting.

### Ulley

Ulley is a small village with its Conservation Area surrounding most of the settlement and adjoins countryside for most of the boundary, except for a small southwestern corner of the village. The designated heritage assets affected are as follows:

- Ulley Conservation Area. It is noted that landscape mitigation and enhancement areas are located to the north of the village and to the east, which has the potential to enhance the immediate setting of the Conservation Area from these locations. However, the LVIA should address views to Ulley Conservation Area from these directions.

Concerns are raised about the proximity of the solar farm immediately to the southernmost section of the Conservation Area adjacent to Turnshaw Farm and Ulley Hall Farm. In my view the proximity of the solar farm to this part of the Conservation Area would lead to less than substantial harm to its wider setting.

Concerns are also raised about the potential impact on the setting of the Conservation Area from wider views to the west looking towards the Conservation Area, however, the landscape mitigation could reduce this level of harm. Though without any details of the planting in this location my view is that the harm to the setting of the Conservation Area is less than substantial. However, considerable concerns are raised about the proximity of the solar farm to the southernmost section of the Conservation Area.

### Hardwick

The hamlet of Hardwick consists of three isolated farmsteads with a small number of additional dwellings. The designated heritage assets affected are as follows:

- Hardwick Hall Farmhouse Grade II listed. This property and its curtilage listed barns are in the closest proximity to the solar farm to the north. In my view the wider setting to the north of this Grade II listed building and its grouping of curtilage listed barns would be harmed by the proposals. This harm would be less than substantial.
- Hardwick Grange Farmhouse Grade II. The property is located further to the south of the proposed solar farm though maintains an open aspect to the north so there is potential for harm to its wider setting. This harm is likely to be at the lower end and with suitable landscape screening would not reach the level of harm to be considered to be less than substantial. However, this would need to be successfully demonstrated.
- Dovecote approximately 40 metres to the southwest of Vesey Close Farmhouse. The relatively small size of this building and its location to the south of Vesey Close Farm largely obscures it from the wider views of the solar farm. As such, there would be no harm to the setting of this Grade II listed building from the solar farm.

### Todwick

The main impact to the village of Todwick would be from the solar farm to the north east to the north of the A57. The countryside in this part of the Borough is very open and allows for long distance views to Todwick as well as to South and North Anston. The designated heritage assets affected are as follows:

- 44 – 46 Kiveton Lane, Todwick Grade II. There is potential for harm to the wider setting of this property from the northeast. This harm is likely to be less than substantial or potentially neutral.
- The Church of St Peter and Paul Grade II\*. There is potential for harm to the wider setting of this Grade II\* listed Church from the solar farm to the northeast. This harm is likely to be less than substantial but needs to be demonstrated by suitable photomontages.

- The Manor House Moated Site, Scheduled Ancient Monument. This important moated site is located on the edge of village of Todwick and is adjacent to open countryside. Concern is raised about views from this site over to towards the solar farm to the northeast. The harm is likely to be less than substantial.
- Kiveton Hall Grade II listed. There is potential to harm to the wider setting of this Grade II listed building from views to the northeast. The harm is likely to be less than substantial.

### North Anston

No designated heritage assets would be affected by the proposals in North Anston.

### Church of All Saints Grade I listed Laughton-en-le-Morthen

The Grade I listed Church of All Saints is one of the Borough's most prominent and beautiful Churches. It sits on high land at the top of the village of Laughton-en-le-Morthen and its spire is a notable landmark within the southern part of the Borough. It can be clearly viewed from the A57 between J31 and North and South Anston.

From the submitted information it is not clear what the visual impact would be on the Church from the solar farm to the north of the A57 around Hardwick and to the east of North Anston. However, due to the scale of the development significant harm is likely to the wider setting of this Grade I listed building. Though due to distance this harm is likely to be less than substantial, considerable weight needs to be given to the harm to the setting of this Grade I listed building due to its high status and visual prominence. The Council therefore raises significant concerns on this basis.

### Church of St James Grade I listed South Anston

The Grade 1 Church of St James and its spire is less visually prominent in the wider landscape than the Church of All Saints. However, there is potential for harm to its wider setting when viewed from the east. From the submitted information, it is not clear what level of harm to its wider setting would occur. This would need to be looked at in more detail. However, considerable concerns about potential impacts should be noted.

### Whitestone 3:

Whitestone 3 falls mainly within the Borough with the main settlements affected being Wales, Kiveton Park, Harthill and Woodall.

### Wales

The solar farm is located to the south of Wales Conservation Area. There is a significant distance between the southern boundary of the Conservation Area and the site, however, there is an extensive network of public rights of way allowing public views to the Wales Conservation Area and to the tower of the Church of St John the Baptist. The designated heritage assets affected are as follows:

- There is potential for harm to the wider setting of the Wales Conservation Area in terms of diminishing the rural nature of its southern setting. This harm would be less than substantial.

- The Grade II\* listed Church of St John the Baptist. This important church enjoys a semi-rural setting to the east with open countryside running close to the Church Yard down into open fields to the south. There is potential to harm the wider setting of this Grade II\* listed building, in particular from public views from rights of way to the south. This harm is likely to be less than substantial.

### Kiveton Park

The only affected designated heritage asset in Kiveton Park would be the locally listed Tommy Flockton's Field between Hard Lane to the east and the railway track to the north. There is potential for harm to the wider setting of this site from the solar farm to the east of Hard Lane from long range views. The harm would be less than substantial.

### Harthill

The solar farm to the east of Hard Lane comes close to the northern boundary of the Harthill Conservation Area and to a public right of way to the north of the village. The designated heritage asset affected are as follows:

- It is considered that there is significant visual harm to the wider setting of the Harthill Conservation Area by diminishing this rural setting from the solar farm. The large number of public rights of way to the northeast of Harthill and Kiveton Park and Wales increases this level of harm as it increases the level of public views to the designated heritage asset. The harm to the setting of the Conservation Area would be less than substantial.

The impact on the solar farm adjacent to Harthill Reservoir has the potential to have significant visual impact on the wider setting of the Harthill Conservation Area when viewed from the southwest.

- The tower of the Grade I listed Church of All Hallows is visually prominent from Hard Lane to the north and is visible from wider views in the surrounding landscape. The proposed solar farm to the east of Hard Lane would harm the wider setting of this Grade I listed building. This would be the case from public views from a public right of way to the northeast of Harthill and from a network of public rights of way between Harthill, Kiveton Park and Wales. The fact that the views to the Church Tower would be harmed by the solar farm from public rights of way, increases the level of harm to its setting as public views are compromised and harmed. This harm cannot be fully assessed by the submitted information. The harm is likely to be less than substantial. However, considerable weight needs to be given to the harm to the setting of this Grade I listed building due to its high status and the Council raises significant concerns on that basis.

### Woodall

With regards to Woodall village there is only one designated heritage asset the Grade II\* listed 4 Walseker Lane. This property is largely obscured from view of the solar farm adjacent to Harthill Reservoir, with views to it and from the property highly restricted from Woodall Lane. For this reason, its setting is not expected to be compromised by the proposals.

### Recommendations

The above comments identify the designated heritage assets affected by the proposals. Before a full detailed analysis of the impact upon their setting can be made, full photomontages of the development from all affected viewpoints are required. The methodology for these should be agreed with the Council before the work is undertaken and should be prepared by Heritage professionals. It is expected that this work should dovetail with the Landscape Visual Impact Assessment (LVIA).

The photomontages would also need to be submitted showing the impact of proposed landscape mitigation and enhancement areas. This will need to be done in phases throughout the lifetime of the development. The first set will need to show the visual impact on year 1 then year 5 then year 10, then year 20, year 30. However, noting that the methodology may already have been agreed for the LVIA.

Further information in the form of plans detailing what would happen to the land after decommissioning and in particular the landscape mitigation and enhancement areas is also required. This is particularly important as the loss of these landscape and enhancement areas could significantly alter the setting of the identified designated heritage assets.

Following the receipt of this additional information and the submission of the LVIA, the Council reserve the right to comment on any other designated heritage assets that it may consider to be adversely affected by the proposals.

### Conclusion

The size and scale of the proposed Whitestone Solar Farm would represent the largest single development (in terms of scale) that the Borough has ever seen. It would radically alter the Borough's landscape and the wider setting of the identified designated heritage assets, set out above. There would be harm (or potential harm) to the setting of 4 No. Grade I listed buildings and 5 No. Grade II\* listed buildings as well as substantial harm to the setting of a Scheduled Ancient Monument and potential harm to a separate Scheduled Ancient Monument. In addition, the setting of a large number of Grade II listed buildings would be harmed as well as the setting of 4 No. Conservation Areas, with potential for harm to be identified to additional designated heritage assets and undesignated heritage assets.

The cumulative harm to the historic environment of the Borough, and in particular to some of the Borough's highest Graded listed buildings, would be very high.

The Borough has a long history of coal mining that shaped and scarred the landscape. In the last 30 years through coalfield reclamation, the Borough's landscape has considerably improved visually, which in turn has allowed the enhancement of a large number of designated heritage assets,

The NPPF requires substantial harm to a designated heritage asset to provide substantial public benefits or less than substantial harm to designated heritage assets to provide public benefits. Whilst the identified harm is in most cases less than substantial, collectively the harm to the historic environment in the Borough and to the highest grade of designated heritage assets would be significant.

Though there would be public benefits in terms a relatively small number of jobs created and green energy generation, when balanced against the harm to the historic environment, these benefits do not outweigh this level of harm. It is for this reason that significant concerns to the proposals from a heritage perspective are raised.

The following comments are provided by South Yorkshire Archaeology Service:

### Summary

The following observations by SYAS relate to the entire scheme within both City of Doncaster Council and Rotherham Metropolitan Borough Council areas.

Overall, whilst the methodology utilised is acceptable, further field evaluation is required to adequately inform the assessment of heritage significance. Wider consideration of operational and decommissioning direct impacts is also required to establish the full-lifetime impact of the proposals. Mitigation measures outlined could reduce or avoid significant impacts but will need to be tied to an appropriate outline archaeological management plan to demonstrate the options available and how they will be delivered.

As such, the current assessment of impacts to archaeological remains must be considered provisional. Further archaeological information is required as significant impacts could still occur.

### Detailed Comments

#### Archaeological Baseline

The draft ES incorporates a chapter on Cultural Heritage and Archaeology that presents the findings of an assessment of the predicted presence and significance of heritage assets of archaeological interest and anticipated options for mitigation to reduce impacts. This has been established using appropriate desk-based sources, supported by a geophysical (magnetometry) survey for large parts of the application area.

A six-step assessment methodology for assessing impact is presented in the draft ES (8.5.45) and this has identified previously unrecorded archaeological features and provided additional detail on known features, ranging from the prehistoric to post-medieval period, within each of the three principal development areas. However, it is important to note that the process is still within the first two steps of that methodology (1. Identify known and potential heritage assets & 2. Assess the heritage significance of those assets). Whilst the geophysical survey is effective in identifying potential archaeological sites, it does not provide a full picture of the character, age or state of preservation of the remains. Consequently, although the draft ES makes progress towards defining areas of heightened archaeological sensitivity and the significance of effect of impacts arising from the proposal, the evidence base on which this assessment has been made is not yet sufficiently robust to draw accurate conclusions. As such, any conclusions must be considered provisional at this stage.

Further field evaluation is required to investigate and more fully describe the significance of affected archaeological remains. This is acknowledged in paragraphs 8.5.13 - 8.5.16 of the draft ES, which sets out a process of consultation, which is ongoing, through which the necessary works will be agreed. The strategy currently under consideration includes:

- The completion of magnetometer survey for all areas where solar infrastructure is proposed, including the preferred cable corridor;
- The undertaking of complementary forms of geophysical survey (such as electromagnetic induction) where the magnetometry survey has been less effective due to the presence of adverse site conditions (such as green waste) or where the nature of potential remains is less conducive to detection by that method (such as stone built structures); and
- The undertaking of a programme of evaluation trenching to test the results of the geophysical survey and to accurately describe the significance of effected archaeological remains. The design of the trenching scheme will take a zoned approach, considering areas of heightened archaeological sensitivity identified through previous stages of evaluation and the different levels of impact arising from the scheme.

The detail of this further field evaluation is still to be agreed but it is expected that these works will set out a proportionate strategy for assessing the significance of heritage assets of archaeological interest within the proposed order limits. They will need completing ahead of submission of the final ES.

### Impact Assessment

The draft ES identifies the range of anticipated impacts that will arise from construction, operation and maintenance and decommissioning. Whilst SYAS consider that the majority of construction impacts have been identified, greater consideration needs to be given to the potential for impacts to emerge during operation, maintenance and decommissioning. In particular, the risks of groundworks extending outside of construction impacts during any refitting works and the potential for remediating soil compaction post-decommissioning to return land to agricultural use. Full acknowledgement of these risks is necessary so appropriate mitigation measures can be incorporated in the management documents. This should also be reflected in the commitments register in Appendix 2.3 and impact assessment in section 8.8.

The potential for indirect impacts arising from the operation of the scheme to heritage assets whose settings are sensitive to change within the development area are assessed in Vol.3 App.8.4. In relation to heritage assets of archaeological interest, SYAS agree with the identification of the Scheduled Monuments of Blue Man Bower, Conisbrough Castle and Conisbrough Parks Roman Villa as potentially sensitive receptors. Furthermore, whilst no non-designated assets have been assessed to have settings sensitive to the development, given the degree of public interest in Conisbrough Deer Park we would recommend that this is added to the assessment. The methodology applied in assessing these impacts is appropriate, but the conclusions should be viewed as provisional at this stage, subject to completion of the forthcoming field evaluation. This work may provide further information on the setting of these monuments, and identify new sensitive receptors, which will need consideration. For instance, discussion of potential impacts to the setting of the scheduled monument within the proposed order limits, Conisbrough Parks Roman Villa, acknowledges that currently unidentified Roman archaeological remains may extend beyond the current boundaries of the scheduling and that there is evidence in the wider area to suggest possible surviving Romano-British structures associated with the villa estate. Quantifying this potential will be one of the aims of the further field evaluation. Should such features be identified, their contribution to the setting of the villa will need to be assessed.

Irrespective of the assessed scale of effect (the finalisation of which is subject to the

completion of the additional field evaluation set out above), a range of mitigation measures are proposed in the draft ES (section 8.7) by which direct impacts can be reduced or avoided. For subsurface remains of known or potential regional value, preservation in situ is identified as the preferred option with a summary of construction options to achieve this identified.

Whilst this approach is supported, a detailed archaeological management plan will be required to outline the options and the process by which their details will be approved in order that such works can be designed and implemented post-consent.

The draft ES identifies that mitigation measures will be included in the Construction Environmental Management Plan (CEMP; section 8.7.19), however SYAS would recommend that a specific Archaeology Management Plan is prepared which sets out the mitigation measures for the different phases of the schemes lifetime which can then be referred to in the other specific management plans (such as the oCEMP/ oLBMP/ oOEMP/ oDEMP).

#### Offsetting and Public Benefit

The draft ES identifies the requirement for archaeological works to offset any harm caused by the development to the archaeological resource through:

- recording archaeological remains in advance of their loss and disseminating the associated reports and archives; and
- public engagement and community involvement

SYAS confirm that these measures are appropriate and that we would recommend they are secured within the DCO requirements for delivery post-consent.

There are benefits of early public engagement and SYAS support the draft ES proposal that opportunities are to be developed with Conisbrough Research and Archaeology Group for community fieldwork during the evaluation stage. We would recommend that this programme is informed through consultation with other local heritage organisations within the scheme to identify and develop suitable opportunities. Such engagement will assist in offsetting the loss of access such groups will have for conducting research within land utilised by the development.

#### **Ground Conditions & Land Quality (Chapter 9)**

The following comments are provided by South Yorkshire Mining Advisory Service (SYMAS):

5.5.7 The assessment looks into the risks to the Proposed Development based on past coal mining activities. According to the Mining Remediation Authority's online mapping, W1 is located in a Coal Mining Reporting area. Two High Risk Development Areas have also been identified in the northeast of W1 containing three mine entries associated with probable shallow coal mine workings. More information can be found in NTS Appendix 1, Figures 5.5.1, 5.5.2 and 5.5.3: Coal Mining High Risk Development Areas W1-3.

5.5.8 Phase 1 Coal Mining Risk Assessments are being undertaken to evaluate risks to ground conditions and land quality from historic coal mining. These will be available as part of the ES.

### 5.5.9 They will consider:

- A review of public environmental data on geology, sensitive land uses, hydrogeology, and hydrology.
- An analysis of Coal Authority Reports for High-Risk Areas within the Proposed Development, including datasets on underground coal mining (past, present, future), mine entries, coal mining geology, opencast coal mining, subsidence, mine gas, coal mining hazards, mine water treatment schemes, managed tips and abandonment plans (if necessary).

This concurs with records held by SYMAS and providing further submissions are secured which details the mitigation works required to ensure safe development, in this case from three mine shafts and MRA areas of 'probable shallow coal workings', then SYMAS would have no objections to the proposals.

Given the above SYMAS will look forward to further submissions regarding the coal mining legacy aspect in due course.

The following comments are provided by RMBC:

Previous comments submitted during the EIA scoping stage (dated 12th May 2025) raised concerns relating to land contamination associated with infilled land, coal mining legacy land and historical landfills etc. Those comments emphasized the need for robust assessment of risks to human health and environmental receptors arising from potential disturbance of such land allocated for the Whitestone Solar Farm Development, which are still applicable.

Having reviewed the draft Environmental Statement (ES), a number of concerns have been noted, particularly in respect to the Councils managed closed landfill sites at Maltby Landfill and Kiveton Park Landfill.

These two landfills fall either directly within or immediately adjacent to the proposed cable corridor routes in W2 and W3 parcels of land. Both these landfills remain under active environmental management, with operational landfill gas and leachate extraction systems designed to maintain containment and prevent gas migration to surrounding land and properties.

Any works that involve trenching, cable installation or other intrusive ground activities within or adjacent to these sites have the potential to:

- Damage or sever critical gas and leachate infrastructure
- Create new preferential pathways for landfill gas migration
- Compromise the engineered capping and containment systems
- Increase environmental and human health risks particularly to nearby sensitive receptors, including Maltby Redwood Infants and Junior Academy School located to the immediate east of Maltby Landfill and the nearby residential properties.

#### Maltby Landfill Site – off Warwick Road, off Bawtry Road, Maltby (NGR 451326 392516)

- The proposed cable route option that runs directly through Maltby Landfill is not acceptable from a contaminated land and environmental protection perspective. The site remains under active gas and leachate management, with critical infrastructure present both above and below ground.

Trenching or excavation for cabling would directly interfere with this infrastructure and has the potential to breach containment and compromise landfill gas control.

The presence of a junior school immediately to the east increases the sensitivity of this location and the potential consequences of any gas migration incident.

Trenchless/overground cable runs would not be possible at this site.

For these reasons, the Council is opposed to any proposed cable routes passing through or within the boundary of Maltby Landfill Site. This part of the route should be excluded in its entirety from further consideration within the project design.

Kiveton Park Landfill – To the north of Red Hill, Kiveton Park, Sheffield (NGR 450289 382797) - The cable route option proposed in this area will run through a former unrecorded refuse site and will also be sited adjacent to the Councils closed Kiveton Park Landfill Site.

While not directly within the managed landfill footprint, the proposed alignment lies in very close proximity to the site's containment infrastructure and leachate/gas collection network.

Works in this area risk compromising the engineered barriers and could create gas migration pathways if not carefully assessed and controlled.

This route should only be considered further if the applicant can demonstrate through intrusive investigation, detailed risk assessment and infrastructure mapping, that no adverse impact on the Kiveton Park Landfill containment systems would occur.

Such work would require prior agreement and close supervision by the Councils Landfill Management Team.

### Recommendations

The applicant should remove the Maltby Landfill Site/Cable Route option from further design development.

For the Kiveton Park Cable Route, the applicant should undertake:

- A detailed Landfill Infrastructure Risk Assessment, and Intrusive Ground Investigation complete with gas monitoring, to demonstrate safety and no interference with existing control systems and no risk to the environment, human health etc.

Any future works in close proximity to the Councils managed landfills must be subject to:

- Approval by the Councils Landfill Management Team
- Supervision during works to protect existing gas/leachate systems
- Method Statements demonstrating how risks will be mitigated.

No construction works should proceed within or adjacent to Council managed landfill sites without prior written consent from the Council's Environmental Protection/Contaminated Land/ Landfill Management Team.

### Battery Energy Storage System (BESS) Locations and Ground Stability

The draft ES provides insufficient detail regarding the proposed locations, design and number of BESS units. Without this information, it is not possible to assess the potential risks associated with ground conditions, contamination and land stability in areas where these installations are proposed.

BESS compounds typically require substantial foundations. A land stability assessment and intrusive site investigation/detailed risk assessment for each proposed BESS compound will be required.

Until such information is submitted and assessed, the Council is unable to confirm whether the proposed BESS locations are suitable or stable for development.

### Ground Investigation Requirements in High-Risk Areas

The draft ES makes mention to the need to adequately address ground stability and contamination issues within areas identified as being of development high risk due to coal mining legacy, historical landfilling or infilled ground. These works are welcome, and it should be noted that the ground conditions may present a range of hazards, including but not limited to:

- Shallow mine workings and mine entries
- Void collapse or differential settlement
- Presence of ground gases (methane, carbon dioxide) and migration
- Ground contamination and variable geotechnical strength associated with infilled or made ground.

Prior to any construction or groundworks, the applicant must undertake comprehensive site investigation and risk assessment in accordance with current UK guidance for contaminated land and ground gas risk assessment.

Comprehensive ground investigation and stability assessment must be undertaken in all areas identified as being within coal mining high risk development areas, historical landfills, refuse sites or infilled ground. The investigations must demonstrate that the ground is suitable and stable, that there are no unacceptable risks to human health, property or the environment and that appropriate remedial or mitigation measures will be identified.

### Conclusions

The Council objects to the proposed cable route option through Maltby Landfill Site and expresses strong concern regarding the cable alignment adjacent to Kiveton Park Landfill Site.

Both sites contain active environmental protection systems that are critical to maintaining containment integrity and protecting nearby receptors, including a school and residential areas.

The applicant must amend the proposed cable route options to avoid these areas or provide robust evidence-based assessments demonstrating that risks can be fully mitigated to the Council's satisfaction.

Further clarification is also required regarding the siting, the scale/number of BESS units to ensure that land stability and contamination risks will be properly assessed. Without this information the Council cannot confirm the suitability of these proposals.

Comprehensive investigation and risk assessment within former coal mining, landfill and infilled ground areas will be essential to ensure that the proposed development does not pose unacceptable risks to human health, property and the environment.

It is considered that this response outlines key issues and recommendations to ensure that potential land contamination issues will be adequately addressed in the Environmental Statement.

## **Water Resources & Flood Risk (Chapter 10)**

### Flood Risk Assessment (FRA)

- The FRA appropriately identifies Flood Zones 1, 2, and 3, including Flood Zone 3b (functional floodplain), using EA hydraulic modelling and Strategic Flood Risk Assessments (SFRA).
- The sequential approach has been applied, with sensitive infrastructure (e.g., BESS, substations) located in Flood Zone 1 where feasible.
- The FRA considers climate change allowances for the 2080s epoch, applying a 50% uplift to river flows, which is conservative and appropriate for the 60-year operational lifespan of the development.
- The FRA will include assessment of floodplain compensation where PV arrays are located in Flood Zones 2 or 3, ensuring no net loss of flood storage.

### Recommendations:

- The FRA methodology is robust. Final FRA submission should confirm compensatory storage volumes and demonstrate no increase in flood risk elsewhere.
- The final Surface Water Drainage Strategy should include detailed hydraulic calculations, exceedance flow routing, and maintenance plans for SuDS features.
- Watercourse consent applications should include ecological impact assessments and demonstrate compliance with the mitigation hierarchy.
- Groundwater protection measures should be secured via the Construction Environmental Management Plan (CEMP) and monitored during construction.
- Reservoir impact assessments should be included in the final ES, with buffer zones and construction controls clearly defined.
- Permit applications should be submitted early to avoid delays, and include method statements, pollution prevention plans, and hydraulic assessments.

## Climate Change & Greenhouse Gas Assessment (Chapter 11)

From an energy management and decarbonisation perspective, the Draft ES for the Whitestone Solar Farm shows a strong case for contributing to UK net zero goals, but there are also practical considerations for long-term system performance and resilience.

### General Observations on the Proposed Development:

Category	Strengths	Questions / Concerns
Scale and Contribution to Net Zero	Scale and ambition: 750 MW solar capacity with BESS integration makes this a nationally significant decarbonisation project with clear alignment to UK Clean Power 2030 targets.	
Energy Storage and Grid Flexibility	<b>Battery Energy Storage System (BESS):</b> Supports grid stability, reduces curtailment, and allows renewables to displace fossil fuels more effectively.	<p><b>Duration of storage:</b> Consider longer-duration storage options or hybridisation (e.g. flow batteries alongside lithium-ion) to improve resilience and reduce reliance on fossil fuel generation for peak loads.</p> <p>Is there a battery recycling or circular economy plan in place for end-of-life, given the critical mineral use?</p>
Climate Resilience & Risk Management	Elevated infrastructure, vegetation beneath arrays, and fire/flood risk planning demonstrate foresight on adapting to climate risks.	How will <b>soil compaction</b> during construction be mitigated to preserve infiltration and carbon storage potential?
Operational Decarbonisation Measures	<p>Commitments to avoid SF6 use where possible, adopt low-emission vehicles and generators, and maximise local recycling and material reuse will reduce construction-phase impacts .</p> <p>Lifecycle GHG assessment confirms the residual emissions are “Not Significant” relative to UK carbon budgets .</p>	<p><b>Embodied carbon in panels and batteries:</b> The ES accounts for lifecycle GHGs but doesn’t mention supplier screening. Specify requirements for low-carbon manufacturing e.g., solar modules produced using renewable electricity, or batteries with recycled content.</p> <p><b>Scope 3 emissions:</b> Strengthen commitments to track and report Scope 3 emissions from construction, maintenance and replacement cycles.</p>

Wider Decarbonisation Benefits	<b>Long-term operation (60 years):</b> The long lifespan increases the project's annualised carbon intensity and improves the overall return on embodied carbon ('carbon payback').	Will the project commit to annual public reporting on carbon savings, energy generation vs forecast, and biodiversity outcomes?  How will technology upgrades (higher efficiency panels, new BESS systems) be integrated over 60 years to avoid technological lock-in?
Social Value / Community Engagement	We note section 4.3.2 (page 22), whereby details regarding community and stakeholder engagement are outlined.	
Modern Slavery / Supply Chain Transparency		Albeit not directly related to the draft Environmental Statement, we are concerned to highlight exposure to Modern Slavery within the solar PV supply chain. We recommended that this issue be included in the EIA either as a 'wider socio-economic effect' or addressed separately through a Modern Slavery Transparency Statement. Whilst we note that 'Socioeconomics and Land Use' constitutes Chapter 15 of the draft ES, Modern Slavery has not been referenced once in this chapter.

#### Detailed Observations on Chapter 11 of the Draft Environmental Statement

Reference	Questions/Concerns
<b>Consultation Booklet, 18 November 2024 – 17 January 2025</b>  <b>Draft ES, paragraph 5.1.2</b>  <b>Et al.</b>	In its Consultation Booklet of 18 November 2024 – 17 January 2025, the applicant stated that, "If constructed, Whitestone would generate up to 750 MW of energy, which is enough to power up to 250,000 homes", based on an average annual energy consumption of 3,200 kWh per household. In paragraph 5.1.2 of the draft Environmental Statement (ES) [ <i>and elsewhere in its consultation literature, including its 'Whitestone 1 Consultation Booklet', dated 16 September – 28 October 2025</i> ], the applicant again refers to a total installed capacity of "approximately 750 megawatts".  However, in a statutory consultation briefing organised for RMBC and City of Doncaster Council officers, agents acting on behalf of the applicant emphasised a large reduction in the proposed area of solar

	<p>panels, with 279 out of 1,100 ha removed from the project design, in response to the first, non-statutory round of community consultations.</p> <p>How can the applicant justify no change in the proposed installed capacity and generated output from a project, which has been cut by 25%? Or were the 'potential solar panels and associated infrastructure areas' nearest to homes and villages never intended to be developed – but included in the project design, only to present the illusion that local concerns were being heard?</p>
<p><b>Consultation Booklet, 18 November 2024 – 17 January 2025</b></p> <p><b><i>Et al.</i></b></p>	<p>In its consultation literature as referenced above, the applicant assumes an average annual energy demand of 3,200 kWh per home, without justification. This assumption yields a potentially misleading estimate of the proposed development's total generated electricity output, as being sufficient to power 250,000 homes.</p> <p>If the figure refers only to electricity demand, it is too high; if it refers to total household energy demand (as in fact it would seem, from the applicant's choice of phrase) then it is much too low. In Rotherham, combined annual domestic energy demand for electricity and natural gas heating was 14,460 kWh per household, in 2023.</p> <p>Accounting for a transition to low-carbon domestic heating systems over the lifetime of the proposed development, as committed by Government policy - by assuming general adoption of air source heat pumps as the leading technological alternative to natural gas boilers [<i>and ca. three times more efficient</i>] – local households' future annual energy demand may be reasonably projected as 6,200 kWh per annum.</p> <p>It may be that the applicant further assumes the widespread adoption of rooftop solar PV by households, which could account for the difference between the above figure and that supplied in the consultation literature. If this is the case, then it is worth stating such an assumption in the interest of transparency – not least because rooftop solar has attracted interest as a potential 'alternative' to large-scale, ground mounted installations of the type proposed; whereas the above analysis underlines that both widespread domestic adoption of rooftop solar and large solar farms will be needed, to deliver sufficient clean energy to fulfil the UK's climate change commitments.</p>
<p><b>Draft ES, para 11.8.17</b></p>	<p>In paragraph 11.8.17 of the draft ES, the applicant calculates the total avoided greenhouse gas emissions from other, more carbon intensive electricity generation displaced by the proposed development. The applicant claims to have used the 2024 UK electricity grid average conversion factor, from the set of conversion factors for company reporting published by the Department for Energy Security and Net Zero, as per the citation at footnote 34 in Chapter 11 of the draft ES.</p> <p>From information published elsewhere in the consultation literature and as noted above, the applicant expects electricity generated by the proposed development to be sufficient to power 250,000 homes, assuming 3,200 kWh per year per home. As the development is</p>

	<p>proposed to have a 60-year lifetime, this implies an estimated total lifetime output of</p> $250,000 \times 3,200 \times 60 = 48,000,000,000 \text{ kWh} = \mathbf{48,000 \text{ GWh}}$ <p>In 2024, the UK electricity grid average conversion factor was <b>0.20705 kgCO}_2\text{e}</b> per kWh. Following the applicant's own methodology and the estimated total lifetime output as imputed from other details in its consultation literature and as calculated above, this would imply</p> $48,000,000,000 \times 0.20705 = 9,938,400,000 \text{ kgCO}_2\text{e} = \mathbf{9,938,400 \text{ tCO}_2\text{e}}$ <p>Whereas the applicant quotes an estimated 16,000,000 tCO<sub>2</sub>e total greenhouse gas emissions avoided, as a result of the proposed development. Which figure is incorrect? 250,000 homes, 3,200 kWh per year per home, 16,000,000 tCO<sub>2</sub>e – or all three?</p>								
<b>Draft ES, 11.8.18</b>	<p>Similar issues attend a complementary estimate of total greenhouse gas emissions avoided, if the proposed development were assumed exclusively to displace electricity that would have been generated from natural gas, presented in paragraph 11.8.18 of the draft ES.</p> <p>In its Fuel Mix Disclosure for the 2024 calendar year, the Department for Energy Security and Net Zero estimates the carbon dioxide emissions intensity of different energy sources in the UK electricity generation fuel mix: a small section of the table is reproduced below.</p> <table border="1" data-bbox="562 1131 1038 1298"> <thead> <tr> <th data-bbox="562 1131 806 1170">Energy Source</th> <th data-bbox="927 1131 1038 1170">g/kWh</th> </tr> </thead> <tbody> <tr> <td data-bbox="562 1170 806 1208">Natural Gas</td> <td data-bbox="927 1170 1038 1208">382</td> </tr> <tr> <td data-bbox="562 1208 806 1246">Renewables</td> <td data-bbox="927 1208 1038 1246">0</td> </tr> <tr> <td data-bbox="562 1246 806 1284">Overall average</td> <td data-bbox="927 1246 1038 1284">154</td> </tr> </tbody> </table> <p>Albeit these carbon intensities do not consider the global warming potential of greenhouse gases other than carbon dioxide, CO<sub>2</sub> accounts for 98.98% of the 2024 UK electricity grid average conversion factor for company reporting published by the Department for Energy Security and Net Zero, so any discrepancy is expected to be small.</p> <p>Applying the carbon dioxide emissions intensity to an equivalent amount of electricity generated from natural gas over the lifetime of the proposed development i.e., 48,000 GWh as calculated above, yields an estimate of total greenhouse gas emissions avoided:</p> $48,000,000,000 \times 382 = 18,336,000,000,000 \text{ g} = \mathbf{18,336,000 \text{ tCO}_2\text{e}}$ <p>Whereas the applicant estimates total greenhouse gas emissions avoided on this basis, as a result of the proposed development, as 32,000,000 tCO<sub>2</sub>e. Again, how does the applicant account for this discrepancy?</p>	Energy Source	g/kWh	Natural Gas	382	Renewables	0	Overall average	154
Energy Source	g/kWh								
Natural Gas	382								
Renewables	0								
Overall average	154								

<b>Draft ES, Table 11.14 &amp; para 11.5.41</b>	<p>In Table 11.14, the applicant notes that “Construction activities may lead to... Moderate adverse effects expected in relation to permanent soil loss.” Soil erosion is a recognised source of carbon emissions (especially over shorter timescales) and yet is absent from greenhouse gas assessment of the construction phase of the project, according to its scope as defined at paragraph 11.5.41 of the draft ES:</p> <ul style="list-style-type: none"> <li>• Extraction, manufacture and transport of materials</li> <li>• Emissions associated with the construction processes onsite (including fuel consumed by equipment and vehicles used to construct the Proposed Development; and fuel used in generators for electricity supply during construction)</li> <li>• Disposal and/ or recycling of the materials and equipment</li> </ul> <p>Will the applicant ensure that the carbon impact of soil loss is accounted for in its <i>[non-draft]</i> Environmental Statement?</p>
<b>Draft ES, Table 11.13</b>	<p>Is the applicant not concerned that no climate risk affecting the proposed development is assessed to be significant (Table 11.13, draft ES)? An all-green risk register is often a sign of poor risk management, or appraisal.</p> <p>An assessment that the consequence of “Increased extreme heat days causing overheating in substations and BESS [<i>battery energy storage systems</i>], leading to thermal shutdowns, fire hazards and operational disruption” is <b>Minor</b> (my emphasis) is hard to credit. Albeit the applicant has committed to prepare an outline Battery Safety Management Plan it would do better not to appear to downplay such a risk, in its Environmental Statement.</p> <p>Since the applicant does not provide an assessment of climate risks in the absence of embedded mitigation measures, it is not possible to form an impression of their effectiveness. In the interest of transparency, the applicant should consider publishing risks’ assessed significance, with and without embedded mitigation measures.</p>
<b>Draft ES, Tables 11.7 &amp; 11.8</b>	<p>In Tables 11.7 (Climate Baseline Data per Indicator) and 11.8 (Climate Indicator Data for Proposed Order Limits Resolution) the applicant refers to the McArthur Forest Fire Danger Index (FFDI) as its adopted measure of wildfire risk, within the proposed order limits. Did the applicant in fact use this measure, or has it applied the alternative Grassland Fire Danger Index, which would seem more appropriate to the site in question?</p> <p>Regardless of which index the applicant has used in its assessment would it not have been more appropriate to consult local records held by South Yorkshire Fire and Rescue Service? That a measure has been “widely used in Australia for several decades” (Table 11.7) is hardly proof of its suitability: Australia has a much more dispersed population than the UK, where accidental and deliberate ignition from human disturbance greatly exacerbates background/meteorological wildfire risk.</p>

<b>Draft ES, para 11.6.13</b>	At paragraph 11.6.13 of the draft ES the applicant concedes that mean wind speed cannot account for the increases in the frequency and severity of storms and extreme gusts (and their potential damage to electricity infrastructure, including solar panels). Why then has it not chosen a more suitable climate indicator?
<b>Draft ES, para 11.5.28</b>	At paragraph 11.5.28, the applicant cites a 2012 study by the United States National Renewable Energy Laboratory (NREL) assessing the lifecycle emissions of large-scale solar PV installations. An updated assessment is available, published in March 2024:  <a href="https://docs.nrel.gov/docs/fy24osti/87372.pdf">https://docs.nrel.gov/docs/fy24osti/87372.pdf</a>
<b>Draft ES, Plate 1</b>	Decision tree criteria presented in Plate 1 (page 15 of Chapter 11, draft ES) are flawed: a fairer appraisal of climate hazards' likelihood would not consider a hazard unlikely, if it had exceedances across multiple climate change scenarios, but in only one timeframe. It goes against the term's natural interpretation, to determine as unlikely an event which may be very probable across all climate change scenarios by the 2080s though not before. This could be addressed in a 'Step 2' which asked "Are there exceedances across EITHER multiple timeframes OR multiples SSPs?" and so on.  This is not an abstract point but rather has material consequences for the way climate risks are assessed in the draft ES.
<b>N/A</b>	Albeit the climate risk assessment considers receptors within the proposed order limits, the proposed development may be expected to exacerbate some climate risks. Whereas implications for fluvial and pluvial flood risk beyond the site boundary are treated in Chapter 10 there is no consideration in the draft ES of how such extensive development of existing green space may exacerbate near surface air temperatures and hence people's exposure to extreme heat.

## Air Quality (Chapter 12)

No comments received.

## Traffic and Transport (Chapter 13)

The Council are broadly in agreement with the principles set out in the Statements but would caution that how the detailed practical arrangements are addressed will be key to the successful implementation of the strategies.

Traffic generation – The Council's confirm the general approach is acceptable and that the assumptions made are reasonable, but the issue of individual junction impact will need to be addressed.

Access – Whilst the proposed access locations are indicated, detailed information will be required to assess the locations. As previously stated, all accesses should comply with industry standards and both tracking exercises and Road Safety Audits will be required in support. It is worthy of note that the proposed access on Sheffield Road which is the former trunk road and is the A57 main link between the M1 and A1 should be relocated and served from an alternative highway.

Routing – tracking exercises demonstrating two HGV's passing may be required in certain locations.

Dilapidation Survey – Prior to the commencement of works a dilapidation survey should be agreed with RMBC.

The Council wish to be involved in the discussions around detailed design / routing / timings etc.

Having regard to the wider Public Right of Way network, it is noted in this Chapter at paragraph 13.8.1362 states:

*During the construction phase, the presence of plant and equipment in work areas adjacent to the PRoW network may temporarily reduce the amenity value of the paths, however, the effects would be temporary and short-term. Appropriate construction traffic management measures (within the oCTMP) will be put in place to manage these effects. This would include, for example, solid fencing / barriers in areas where dust is generated together with appropriate signage to caution passers-by of construction. It is acknowledged that temporary diversions and management measures may be required for some of the paths within the Site. An Outline PRoW Management Plan will also be prepared to support the development proposals and will include details of specific routes that may be affected and also set out any proposed mitigation required to mitigate the impacts of the potential interactions between construction traffic and the users of the PRoW network.2*

RMBC would welcome sight of the Outline PROW Management Plan once prepared.

Additional and like many local authorities, Rotherham Council has a standing Local Access Forum who are a statutory, independent public consultee for matters relating to Countryside Access and we will involve them in feedback and comments from that Management Plan. It would be welcome to see the future proposals take account of the guidance issued by the British Horse Society on solar developments in this plan, as this offers some very sensible and practical advice that is applicable to all users. In particular it would be beneficial to embrace the guidance on construction within the advice, and also note the concerns riders have about noise issues and how this can be alleviated.

The Council understand the need to protect public safety during development and would, as in many other developments across the borough, be happy to collaboratively to ensure public safety whilst retaining (and potentially enhancing) access during the construction phase.

Rotherham Council are, like other highway authorities, in receipt of a number of claims for public rights on paths used by the public and which are not shown on our Definitive Map of rights of way presently. The attached maps show these routes, which are denoted by red lines.

Finally, the Council would welcome the opportunity to work with the applicant and the Local Access Forum to explore options for permissive path dedication for the duration of the development, and trust that an offer to work with the local community on such proposals is embraced as part of the PROW Management Plan. Enhancing public access alongside this development would be of great benefit to users for a number of years.

## **Noise & Vibration (Chapter 14)**

The chapter covers noise and vibration from construction and decommissioning of the development as well as operational noise. It considers the relevant legislation and guidance documents including BS5228-1:2009+A1:2014 and S4142:2014+A1:2019, which are applicable. Comments on the draft Environmental Statement in relation to noise and vibration are as follows:

It is noted that in Chapter 14, Section 14.7.4 of the Draft Environmental Statement that the operational construction hours are proposed to be 07:00-19:00 Mondays to Fridays and 07:00 - 13:00 on Saturdays. Such early morning works especially in rural locations is likely to result in disturbance to local residents/nearby sensitive receptors. It is therefore the Council's opinion that a start time of 08:00hrs Mondays to Fridays and 09:00hrs on Saturdays be implemented. This would protect nearby sensitive receptors from adverse impact, and it would be in line with current practices within the Rotherham borough.

Noise Categories have been set for each location under the ABC method as described in BS5228-1:2009+A1:2014 and maximum noise levels as a result of the construction works have been calculated/modelled based on plant and equipment that is proposed to be used on site. Table 14.3-7 and 14.3-8 of Appendix 14.3 shows exceedances of the noise limits (labelled as 'Moderate') at various receptor locations. Where this is the case further mitigation is necessary and needs to be detailed in the Construction Environmental Management Plan. Noise levels need to be reduced so as not exceed the threshold within the relevant Noise Category for each receptor location. Active noise monitoring also needs to be provided whilst construction works are being undertaken to demonstrate compliance with the specified noise limits.

Appendix 14.3, table 14.3-9 shows levels of vibration from the proposed construction works calculated at each receptor location. Vibrations over 1.00 mm/s will likely result in complaints. It is evident that some receptor locations are predicted to experience levels of vibration of up to 4.8 mm/s and this will therefore result in adverse impact. Mitigation measures including vibration monitoring needs to be implemented as well as suitable methods of liaison with the public. All measures need to be detailed within the Construction Environmental Management Plan.

### **Noise – Operational Phase:**

Noise from the proposed development has been calculated/modelled based on plant and equipment as detailed in Table 14.4-2 of Appendix 14.4. The calculated rating levels as detailed in Tables 14.3-3 and 14.4-4 shows that the Council's criteria of a noise rating level of no more than 0dB above background noise level is exceeded at various locations. There is therefore the potential for adverse impact on nearby sensitive

receptors. Further to this given the rural locations where the development is proposed, and the continuing trend of installing these types of equipment in such locations there is concern about creeping backgrounds. Volume 1, Draft Environmental Statement, Chapter 14, Section 14.7.16 mentions that further mitigation is to be considered and implemented where necessary and practicable. When considering mitigation at the detailed design stage this needs to ensure that a rating level of no more than 0dB(A) above the prevailing background noise levels is achieved at all receptor locations and it is necessary that this rating level is not exceeded. As it currently stands the proposal can be considered as not being suitable due to it having the potential for adverse impact on some noise sensitive receptor locations as a result of operational noise.

## Socio-Economics & Land Use (Chapter 15)

### Table Summary of Comments

Section	Planning Policy Team Comments
15.2.3	<p>The Local Policy section at 15.2.3 should reference all relevant parts of the Rotherham Local Plan which includes the following documents that are not mentioned: The Barnsley, Doncaster and Rotherham Joint Waste Plan (adopted 2012) and Dinnington St John's Neighbourhood Plan (adopted 2021). Furthermore, please note relevant SPD:</p> <ul style="list-style-type: none"> <li>2. Air Quality and Emissions (Adopted June 2020)</li> <li>3. Development in The Green Belt (Adopted July 2023)</li> <li>5. Equal and Healthy Communities (Adopted June 2020)</li> <li>11. Natural Environment (Adopted June 2021)</li> <li>12. Transport Assessments, Travel Plans and Parking Standards (Adopted June 2021)</li> <li>14. Trees (Adopted July 2023)</li> <li>15. Preparing a Soils Strategy (Adopted July 2023)</li> <li>16 Biodiversity Net Gain -pre-mandatory but adopted by Cabinet - available as Agenda item 13 <a href="https://modgov-p-db1.rotherham.gov.uk/documents/g15881/Public%20reports%20pack%20Monday%2010-Jul-2023%2010.00%20Cabinet.pdf?T=10">https://modgov-p-db1.rotherham.gov.uk/documents/g15881/Public%20reports%20pack%20Monday%2010-Jul-2023%2010.00%20Cabinet.pdf?T=10</a> (BNG guidance (including Lanpro guidance) is here: <a href="#">Planning Guidance – Rotherham Metropolitan Borough Council</a></li> </ul>
Table 15.4:	<ul style="list-style-type: none"> <li>Socio-cultural effects are framed by health concerns within the borough please see RMBC Public Health Comments. The engagement with the local communities should be very robust before the spade hits the ground, during and after construction</li> <li>Ensure consideration is given to all life stages of the development.</li> <li>Perception of change in local identity and sense of place needs further exploration and results fed into mitigation plans; please see Landscape Team comments.</li> </ul>
15.5.4	<p>It is noted the Neighbourhood Study Area Wards do not include all wards affected.</p>
15.5.5	<p>The text says 'Socio-cultural effects: Socio-cultural effects are not likely to be significant at a national or local level but may be perceived or observed at a neighbourhood level' – it is noted the scheme crosses local authority boundaries and affects multiple wards. The impact is beyond neighbourhood level and have impacts at a subregional level.</p>

Section	Planning Policy Team Comments
	It is considered people's perception of the affected area, including those of visitors could potentially change. The solar farm is located along key arteries in the borough. The success of the mitigation to be put in place will be critical.
15.5.9	The Rotherham Local Plan Sites and Policies must be considered as part of the future baseline. The future baseline needs to consider the evolving new Local Plan which will be based on new housing targets from central government. The need to mitigate and adapt to climate change should be considered in preparing and assessing planning applications (NPPF S163). Though it is noted that the loss of land to renewables infrastructure will reduce the total area of land available for other uses including potential options for housing and employment land. It will reduce the area of open countryside. The substantial extent of the solar farm infrastructure will significantly and negatively impact on communities and visitor perceptions of this borough.
15.5.20	Please see previous comments on the Draft ES chapters, the ecological impact needs to be included in the baseline assessment. Recommendations to substantively amend the ecological chapter have already been provided. An ecosystem services approach should be applied.
15.5.21	This section says ' <i>Following decommissioning, it is assumed that it will be possible for most of the land required for the construction and operation and maintenance phases of the Proposed Development to be returned to use for arable farming or other uses that preceded the Proposed Development</i> ' please provide further information and assurance that it will be possible to return the land to arable farming or previous land use with the scheme proposed. It is noted the success of land restoration depends on several factors including soil management during the solar farm's operation, the decommissioning strategy, and the original condition of the land. Please see Rotherham Local Plan Preparing a Soil Strategy Supplementary Planning Document.
15.5.22	This section says ' <i>Tourism impacts beyond 5 km of the Site are excluded due to the limited geographic influence of the Proposed Development</i> ' it is considered there might be some impact on tourism and sense of place depending on sight lines chosen.
Table 15.18: Tourism Attractions	This includes a table of visitor attractions for Rotherham in 2024 but does not include any of Rotherham's three country parks.
15.6.34	Include consideration of scheme's impact on all of Rotherham's country parks: Ulley Country Park (UCP), Thrybergh Country Park (TCP) and Rother Valley Country Park (RVCP) within the ES. These areas traditionally

Section	Planning Policy Team Comments
	<p>provide gateways into the countryside and provide a green lung. The surrounding countryside will be urbanised by these developments. Opportunities to improve linkages and trails out from the parks should be explored and quality trails through the solar farm provided. UCP can be visited on a circular walk from Ulley village, the path that would go through the proposed mitigation area. This walk needs to be accommodated within the mitigation plans for the solar farm to support users of the Country Park. It is noted all of Rotherham's country parks include LWS and offer wildlife watching opportunities as part of a suite of countryside activities including the quiet enjoyment of the countryside.</p> <p>Greenspace Team have informed me visitor numbers are generally around 150,000 at TCP and 40,000 at UCP. It is anticipated visitor numbers will be highest at RVCP for the three country parks.</p> <p>The purposes of a Local Nature Reserves (LNR) is to conserve and enhance locally important wildlife and geological sites, provide educational opportunities for the public to learn about nature, and offer spaces for people to enjoy and connect with the natural environment for health and well-being. Consideration should be given to how the development will impact the LNR series; particularly at Firsby Reservoir LNR.</p> <p>The Tropical Butterfly House at North Anston is located near the proposed solar farm and a popular visitor attraction, it is not mentioned in the ES.</p>
15.6.36	<p>Please include reference to the Round Rotherham Walk/trail/race that passes through the application site.</p>
15.6.40	<p>The ES does not explore the impact of the scheme on the farming community. How many farmers/tenant farmers will be affected by these proposals?</p> <p>What assessment has been undertaken of the viability of farming for impacted businesses and individuals.</p> <p>Are fields remaining to farmers still suitable for farming?</p> <p>Have all landowners been contacted that would suffer impact by the proposed scheme?</p>
15.7	<p>The mitigation measures in this chapter are insufficient.</p> <ul style="list-style-type: none"> <li>• How exactly will PROW be affected?</li> <li>• Will mitigation be drawn up in discussion with RMBC PROW team and local user groups?</li> <li>• How will the changes affect local informal use such as dog walkers and walkers/joggers for health?</li> </ul> <p>Discussion with local groups will be essential in design of mitigation plans that work for all users and provide optimal solutions.</p>

Section	Planning Policy Team Comments
Table 15.22: Construction Phase GVA Impacts	Only construction phase GVA Impacts are provided, and subsequent stages in the life cycle of the development in this chapter are not included.
15.8.21- 15.8.29	Information should be provided on the impact on the tourism sector beyond construction phase.
15.8.30 - 15.8.36	<p>As requested earlier more information is required on the impact on agriculture, soils, a Soil Resources Plan and impact on farming community is requested including the tenant farmers.</p> <p>In section 15.8.34 please expand on what is meant by alternative suppliers.</p> <p>The effect on food production through cumulative loss of land should be explored. Information on the national context of agricultural soil conservation should be provided. More information on soils should be provided and a deeper robust study provided.</p>
15.7.2	<p>Further confidence is needed in the ES regarding treatment of hedgerows. Brampton Common LWS qualifying interest includes its hedgerow interest. Hedgerows contribute to landscape character by providing historic and local distinctiveness, defining land use, and creating visual and structural patterns. They are historically significant features that can indicate past land divisions and management practices.</p> <p>What studies have been done of other significant hedgerows in the borough? Can mitigation measures for protecting hedgerows be strengthened. A mitigation hierarchy should be followed to protect assets (avoid, minimise, mitigate, compensate). The scheme should avoid and buffer all LWS and candidate LWS, and protect and enhance natural networks and linkages between them.</p> <p>Please see Rotherham Landscape Character Assessment and Landscape Capacity Study including the character areas distinctive features and characteristics and the comments from RMBC on landscape.</p>
Figure 15.4 Index of Multiple Deprivation Draft ES Whitestone Solar Farm	Needs a better key to understand the map
Figure 15.7 - Public Rights of Way and Other Recreational Receptors	<p>Consider inclusion of LNRs, and the Round Rotherham Walk</p> <p>Numbers are provided on the map, but it is not clear what they relate to from the key.</p>

Section	Planning Policy Team Comments
Figure 16.2.2 residential receptors	Provide receptors for the developments around WP2 B1 and Brinsworth B and B1 substations (as shown here <a href="https://whitestonesolarfarm.co.uk/wp-content/uploads/2025/09/Indicative-Construction-Masterplan_W2.pdf">https://whitestonesolarfarm.co.uk/wp-content/uploads/2025/09/Indicative-Construction-Masterplan_W2.pdf</a> ).
Fig 17.1 Cumulative Developments	Update this record as further solar farm applications have been received, please contact RMBC Planning Service as needed.

Summary of above table:

Revise the ES Chapter 15 to:

- Include full local planning policy information.
- Provide a Soil Resources Plan (SRP) and further information on the impact of the scheme on soils conservation and future farming land use.
- An assessment of the impact on farming community is requested. Information is needed on the viability of farming and farming land remaining in respect of impacted businesses, tenant farmers and individuals.
- Assurance is needed that all landowners impacted by the proposed scheme have been contacted.
- The ES should have a separate Health Impact and Equalities Assessment
- The engagement with the local communities should be robust before the spade hits the ground, during and after construction.
- The identification of all impacts on the sense of place, remains to be addressed.
- Further information is needed in the ES chapter regarding treatment of hedgerows and the character areas distinctive features and characteristics Team comments.
- Consider the scheme's impact on all of Rotherham's country parks, LNR, The Round Rotherham Walk. Mitigation to enhance these sites and routeways will no doubt be required following such assessment.
- The shortcomings identified are rectified in discussion with the local authority and other appropriate bodies active within this Borough.
- The Council welcomes any further opportunities along with key natural environment bodies and groups, who support the council in their work, to shape these proposals for Whitestone Solar Farm.

Additional Detailed Comments - Agricultural Land Use and Food Security

The draft ES acknowledges impact on Best and Most Versatile (BMV) land (Grades 1–3a) (207 hectares based on surveys to date) and concludes this would result in a moderate adverse (significant) effect. However:

- The assessment is incomplete, with cable corridor land yet to be assessed.
- There is no clear mitigation strategy for minimising BMV land take.
- The ES does not quantify the impact on local food production resulting from future restrictions to grazing use, despite acknowledging the importance of arable land.

Recommendation: The final ES should include a completed land survey, a justification for BMV land use, and a clearer strategy for minimising and mitigating long-term agricultural displacement.

Socio-Economic Benefits – Quantification and Localisation

The draft ES estimates 12,568 person-years of employment during construction and 94 FTEs during operation, with associated GVA benefits. However:

- Only 25% of construction spend is assumed to occur locally, based on professional judgement rather than empirical data.
- It does not clearly demonstrate how the development aligns with local employment and skills priorities.
- There is no commitment to local hiring, training, or apprenticeships, despite the area's high unemployment and skills gaps.
- The benefits are classified as "not significant", which may underestimate their potential importance for a potential growth sector in a deprived area.

Recommendation: The applicant should commit to a Local Employment and Skills Plan, including targets for local hiring, training partnerships, and apprenticeships, particularly in construction and renewable energy sectors.

#### Community Benefit Strategy

There is no reference to a community benefit fund or other mechanisms to ensure that host communities share in the long-term benefits of the development.

Recommendation: The applicant should outline a Community Benefit Strategy in the final ES, including potential funding for local infrastructure, education, or energy initiatives.

#### Access to Services and Demographic Change

The draft ES concludes that impacts on local services (e.g. health, education) and demographics will be negligible based on the assumption that most workers will commute, with limited evidence provided.

Recommendation: The final ES should include a quantitative assessment of temporary demand and consider mitigation if appropriate.

#### Conclusion

The draft ES provides a solid foundation for assessing socio-economic and land use impacts, but more is needed in terms of:

- Minimising BMV agricultural land loss and justifying its use.
- Maximising local socio-economic benefits through targeted commitments and
- Engaging with local stakeholders to co-develop benefit-sharing mechanisms.

The following comments originate from the Councils Public Health Team and whilst they are not specific to one Chapter, it is considered that they should be considered within the realms of socio economics:

#### Mental Health, Wellbeing and Community Engagement

Solar farms, like any large development, may create a number of impacts on the local environment that can affect mental and physical health. Whether these impacts lead to significant positive or negative health effects is dependent on the impact and the sensitivity of the local populations, including any vulnerable populations.

The level of perceived and actual impact on health and wellbeing can and should be determined with robust community engagement in advance of the developed, during the construction phases and in the period post completion, not just singular consultation events during the application stage.

The draft ES should revisit and outline with the communities involved the significance of effects, including the cumulative effects experienced by the local communities by recent, current and planned future developments.

The Council note that the next phase of community meetings has been scheduled and does not provide the communities to be involved in robust community engagement activity relating to the development now or in the future. This should be addressed, and engagement activity planned throughout the planning phase.

The commitment to ongoing community engagement to address local concerns and anxieties should be explicit and to ensure transparency throughout the project lifecycle.

Access to information via planned consultation is only available either at one of the planned meetings or as a digital download. Additional measures to access information and means of communicating with residents should be discussed with those communities and additional approaches adopted to ensure access to information and engagement opportunities for those that are digitally excluded and or unable to travel / attend your scheduled sessions due to the timings.

Charging for printed versions of your documentation excludes the digitally excluded, those who may need to see printed versions as they cannot access timetabled sessions or those who may require adapted versions of the information.

#### Visual Impact and Landscape

The impact on the visual and functional changes to the landscape have already been identified by the local communities as an issue and negative impact and cause of stress and anxiety, impacting on mental wellbeing. The mitigation solutions and ongoing engagement relating to these concerns over the differing sites should be clearly formulated and articulated in advance of the 'spade hitting the ground' and throughout the construction phase to address anxieties. This issue should be given further consideration within the ES and will require further impact assessments and engagement activity to be conducted. Again, local communities and groups of interest are best place to support the proposal with practical, acceptable solutions whilst respecting the unique character of the areas in contention, supporting our prosperous rural economy and not having a negative impact on rural tourism and public access.

#### Public Rights of Way

Access to public green spaces including Public Rights of Way needs a clearer strategy for management during the construction phases and the ongoing management post construction. Rotherham is 75% rural in nature and the use of public green space is an important resource for health and wellbeing, recreation and rural tourism. This issue should be given further consideration within the ES and will require further impact assessments and engagement activity to be conducted. Our communities and groups of interest are best place to support your proposal with practical, acceptable solutions whilst respecting the unique character of the areas in contention, supporting our prosperous rural economy and not having a negative impact on rural tourism and public access.

#### Noise and Disruption

Working with the communities, relevant partners of interest and local authority colleagues throughout the process can mitigate perceived and actual negative impacts for our residents. These should be communicated clearly in lay terms, not technical language

addressing potential noise and disruption impacts from construction and operational equipment, such as noise-reducing technologies, careful equipment selection and appropriate construction scheduling, to ensure noise levels are within acceptable limits and don't cause cumulative effects.

Ongoing engagement is key to ensure that the development addresses the concerns of our local communities and does not have an unacceptable negative impact on people or disruption on local roads.

Health protection and emergency planning responses need to be clearly articulated for the duration of the development, construction and operational phases. The local emergency response services should be engaged and consulted during this process.

### Summary

Local Joint Strategic Needs Assessment (JSNA) data has not been considered as evidence in the ES. This should be used to understand the needs of the local and wider communities living and working in the immediate and surrounding areas, informing engagement strategies and specific nuances associated with those communities.

NPPF principles should be explicitly outlined in further development work. Meaningful engagement, recognising the local character of the areas in contention (each are distinct, areas, with their own unique needs), promoting health and wellbeing and addressing cumulative impacts of recent developments, contemporary and planned work should be explicitly addressed.

The Council note mental health is to be included within the landscape and visual impact assessment of the ES but the health impacts relate to more than that issue. The development of a separate, comprehensive Health Impact Assessment (HIA) should be incorporated into the project, this can specifically capture the health and wellbeing concerns and mitigations, including emergency planning. Associated with the differing phases of the development and differing issues raised during the first phase of consultation. The HIA can sit outside of the Environmental Impact Assessment and clearly outline the health impacts, support the communities need and implementation of long-term community engagement plan. This will also support meaningful community engagement.

Digital exclusion and wider access to information needs to be considered to reduce inequalities and enable meaningful engagement at all stages of the project. It is essential for residents to have a say in the transition to a net zero borough, and to also feel the benefits from it.

Rotherham Metropolitan Borough Council operates a social value policy. The Council recognises that more can be done to support and strengthen the local economy and supply network and the region's economic resilience, whilst also maximising the amount of social value delivered by companies based outside the area. The Council is pursuing social value outcomes through a Local Labour Policy Interim Planning Statement. This sets out the requirement for major and/or employment generating developments to enter into Local Labour Agreements, increasing the opportunities for local people to access training and local employment. This is something that should be covered by Whitestone as part of this NSIP proposal.

## Other Environmental Topics (Chapter 16)

It is noted that this Chapter refers to topics including Waste, Glint and Glare, telecommunications & Utilities, Major Accidents & Disasters and Electromagnetic Fields.

At present the Council do not wish to make any formal representation on any of these topic areas but reserves the right to make further comment once external consultants are instructed.

## Cumulative Effects (Chapter 17)

The Council is satisfied with the approach taken to cumulative developments set out in Chapter 17. The Long and Short List at appendix 17.2 provides a comprehensive list of determined and proposed developments within the relevant catchments. It would however be useful if the list could be expanded to include the address of each development to make it more user friendly.

Additionally, as, and when the Council receive new applications and/or requests for Screening Opinions within the area of influence, these should be fed into the assessment. The Council will commit to keeping the applicant up to date on these matters.

## Indicative Masterplans

There are concerns regarding the height of the post and wire fencing at 2.2metres high and surrounding all solar arrays; this fencing will be significantly above head height and has the potential to be intrusive in the currently open countryside landscape.

Consideration should be given to appropriate native landscaping that will restrict access into the solar arrays rather than the imposition of incongruous post and wire fencing at 2.2 metres high across significant tracts of Green Belt in Doncaster City and Rotherham Borough. It is also noted that there will be “cameras” pointing along the line of the fencing – again this is an intrusion into open countryside and will be incongruous additional paraphernalia within the Green Belt.

Numbering of the parcels on the Masterplans would have enabled greater attention to detail in providing these comments, unfortunately parcel numbering is provided separately and is not reiterated on each Masterplan requiring opening of many documents and changing of documents to identify correct parcels. Needless to say, there appears to be a dearth of appropriate details, in terms of location and the species that could/are proposed to be planted. It appears within the Masterplans that many of the solar array parcels rely on existing landscaping such as hedgerows and post and wire fencing, that is at 2.2metres is well above head height. There needs to be sufficient and appropriate approach to all fencing to boundaries of the solar arrays.

It is noted that there is no Green Belt assessment provided. Therefore, the Council is unable to appropriately assess the impacts of the BESS, Substations, converters, fencing and solar arrays in the openness of the Green Belt and the impacts on the quiet enjoyment of the open countryside for recreational purposes and for those people living and working within and on the edge of these areas.

It is unclear currently how many BESS units are proposed within the scheme, although their land take is noted. together with the requirement to place palisade fencing around them. Accordingly, there will be impacts on the openness of the green belt, and encroachment into open countryside but there is no green belt assessment provided to enable a full understanding of these impacts.

## **Summary and Recommendations**

I confirm that this letter forms Rotherham Metropolitan Borough Council's response to your statutory consultation and notification pursuant to Section 42 of the Planning Act 2008. Taking into consideration the content of the draft Environmental Statement and the contents of this letter, the council expects the Applicant to continue to positively engage with it on all relevant technical matters as the Environmental Impact Assessment progresses and before Environmental Statement stage submission. It is however important to note that the Council has not yet instructed external consultants to assist them in fully assessing the proposals and as such reserves the right to make further representation should any matters arise.

Yours faithfully



Andrew Bramidge  
Strategic Director Regeneration and Environment

## **Attachments**

Public Rights of Way Plans including:

- Map 1: Ravenfield – Firsby Lane
- Map 2: Ravenfield – Firsby Lane (zoomed in)
- Map 3: Wickersley – Wickersley Wood
- Map 4: Upper Whiston – Stocket Lane
- Map 5: Ulley – Carr Lane & High Lane