

ITEM NO: 1

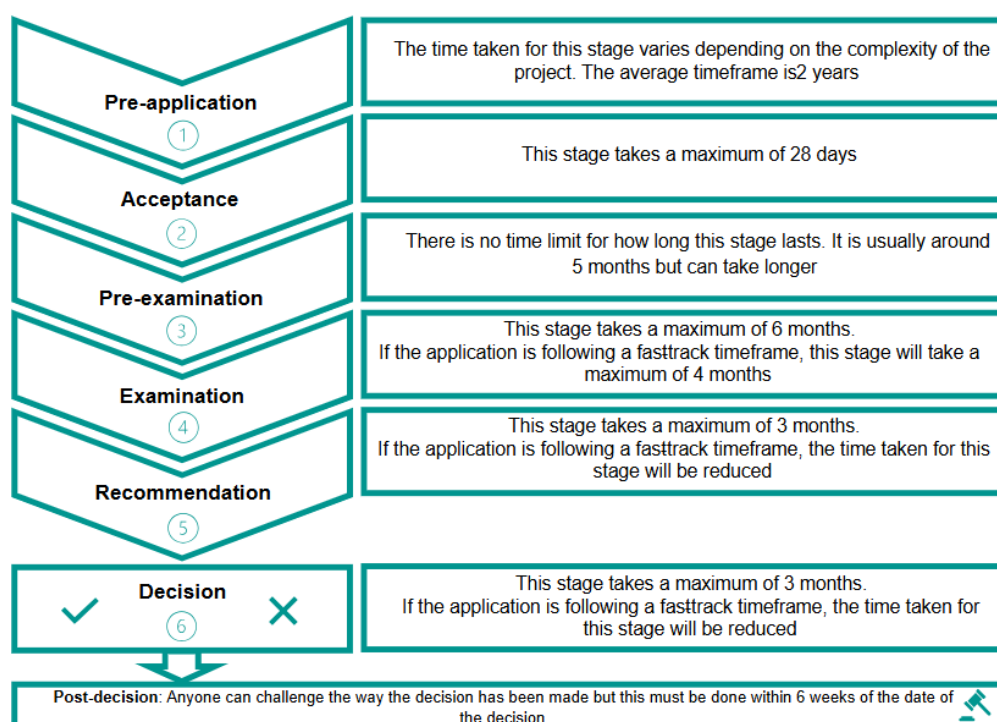
Ref: RB2025/0603

Report Title	Nationally Significant Infrastructure Projects and Whitestone Solar Farm
---------------------	---

1.0 Background

- 1.1 This report outlines proposals for the large-scale Solar Farm, designated as a Nationally Significant Infrastructure Project (NSIP), known as Whitestone.
- 1.2 NSIPs are developments of specific types and scales that the Government considers to be of such national importance that consent for their construction is granted at the national level. Instead of seeking planning permission from the Local Authority, developers must apply to the Planning Inspectorate (PINS) for a Development Consent Order (DCO). The procedure for obtaining a DCO is governed by the Planning Act 2008 ("the Act"). A DCO allows for the consolidation of various consents, including planning permission, thereby streamlining the process and eliminating the need for separate applications such as permits from the Environment Agency or drainage consents from the Lead Local Flood Authority.
- 1.3 PINS, the Government agency responsible for managing NSIP applications, appoints the Examining Authority (ExA) with the agreement of the relevant Secretary of State to assess the proposal and make a recommendation to the Secretary of State for Business, Energy and Industrial Strategy. Under the Act, the final decision on the application rests with the Secretary of State. If approved, the Secretary of State will issue the DCO. The relevant Local Authority (or Authorities, in the case of cross-boundary applications) will then be responsible for discharging and monitoring the requirements of the DCO and any associated legal agreements.
- 1.4 Rotherham Metropolitan Borough Council (RMBC) is a statutory consultee for NSIP projects where they are located within the administrative boundary. This status allows RMBC to provide comments on the proposals, although it does not have decision-making authority regarding their approval.
- 1.5 The Whitestone Solar Farm is primarily located within the administrative boundaries of both the City of Doncaster Council (CDC) and RMBC. As such, both Councils are considered host authorities and statutory consultees. Under the Act, a host authority is defined as a local authority within whose area the application land is wholly or partly situated.

1.6 There are 6 stages of the development consent regime as illustrated below.



- 1.7 While the Council does not possess decision-making authority over Development Consent Order (DCO) applications, it holds a statutory responsibility to carry out specific functions related to them. The Council is also encouraged to collaborate proactively with developers and other host authorities to support the efficient progression of these applications. This engagement typically begins with Planning Performance Agreements (PPAs) and continues through the formal pre-application phase, leading up to the submission and examination of the application by the Secretary of State, in accordance with the six established procedural stages.
- 1.8 The Council plays a vital role in providing local insight throughout the pre-application, examination, and determination phases. Its responsibilities include, but are not limited to, preparing Relevant Representations, Written Representations, and Local Impact Reports. Additionally, the Council contributes to Statements of Common Ground, responds to Written Questions from the Secretary of State and provides input on the content of the DCOs and associated submission materials.
- 1.9 To support the Whitestone proposals, the Council plans to engage external consultants, with funding provided through a Planning Performance Agreement (PPA) by the developer. Notwithstanding this external support, the Local Planning Authority (LPA) will maintain an active and involved role throughout the process.
- 2.0 The Proposals**
- 2.1 The Planning Inspectorate has dedicated project pages for the Whitestone NSIP where members can find project updates and the document register, these are linked under the 'Background Papers and Published Documents' section of this report.
- 2.2 Whitestone Solar Farm is being brought forward by Whitestone Net Zero Ltd (owned by Net Zero One Ltd). Net Zero One Ltd is a specialist renewable energy

development business, founded in 2021 to ensure there is sufficient funding to build, operate and decommission the Proposed Development and other similar projects. The overall manager for the project is Green Nation. Established in 2011, Green Nation states that they have been among the leaders in making the energy transition work. It is a UK-based solar developer and manager of operational sites with experience in both rooftop and ground-mounted solar projects. Green Nation currently manages 75 solar farms and more than 700 solar rooftop installations across the country. Its solar farm portfolio totals over 200 MW of electricity producing capacity for the UK.

- 2.3 Whitestone comprises the construction and installation of solar photovoltaic panels, Battery Energy Storage Systems (BESS) and associated grid connection infrastructure which would allow for the generation of up to 750 megawatts (MW) of electricity across approximately 1,914 hectares (ha) across Doncaster and Rotherham.
- 2.4 The site boundary is shown in **figure 1 attached** and includes up to 1,371 ha for the Site and approximately 543 ha for the Cable Corridor Options. Together, these areas make up the full extent of the Proposed Development, referred to as the Proposed Order Limits.

3.0 Progress to Date

- 3.0 The developers have confirmed that the project is still in early stages of design but has already changed significantly in response to feedback from the first consultation, as well as the results of environmental and technical assessments.
- 3.1 During the first round of consultation in Autumn 2024, the applicant presented the initial proposals for Whitestone and in response to feedback from the community and other stakeholders, they removed around one fourth of the area for solar panels in order to create buffers around homes, villages, and the public rights of way. Most of these areas are still included in the project boundary and are considered useful for environmental mitigation and enhancement. This means that they would not have any above ground infrastructure but would be planted with a mix of native wildflowers and grasses to support wildlife. Additionally, following receipt of results from environmental and technical assessments, they have identified potential locations for the substations and batteries whilst also identifying the potential cable route options to connect the three parts of the project together and into the National Grid. The applicant then presented these proposals for feedback in the second statutory consultation, which ended on the 28th October.

- 3.2 The project is currently at pre-application stage and has the following projected timetable

Event	Estimated Date
Stage One (Pre-Application)	Autumn 2024 until application submission
Stage Two (Statutory Consultation)	Autumn 2025
Stage Three (Application Submission)	Spring 2026
Stage Four (Pre-Examination Period)	Summer 2026
Stage Five (Examination)	Unknown at this time
Stage Six (Decision)	Autumn 2027

- 3.3 Based on this project timetable, the application is expected to be formally submitted to PINS between March and May 2026.

RMBC Input

Planning Performance Agreement (PPA)

- 3.3 The Council and CDC have signed a Planning Performance Agreement (PPA) with the Applicant as part of the pre-application process which provides a framework within which the Council's will engage with the Developers to provide advice on the proposal. Consultants will be instructed on behalf of RMBC and CDC to provide expert assistance in assessing the potential impacts in technical disciplines such as Landscape Character and Visual Impact (LVIA) and Agricultural Land Classification as well as other such specific areas of expertise that are deemed necessary. As this will be funded by the applicant, it will come at a neutral cost to the Council.

Environmental Impact Assessment Scoping Request

- 3.4 The developers submitted an Environmental Impact Assessment (EIA) Scoping Report to the Planning Inspectorate (PINS) for consideration in May 2025. As a host authority and therefore a statutory consultee, PINS consulted RMBC as well as other consultation bodies including CDC. The Council responded to the Scoping Opinion within the statutory timeframes, with input from internal service areas such as Landscape, Ecology and Transportation. This response can be found at **figure 2**.

Statement of Community Consultation

- 3.5 The developer requested feedback on a draft Statement of Community Consultation (SoCC), which set out how the local community would be consulted about the proposed development. The LPA consulted with the Council's Neighbourhood's service who confirmed that the list of community groups and level of consultation was acceptable. This was confirmed to the applicant in an email in July 2025.

Cabinet Report

- 3.6 On the 20th September a report was presented to Cabinet seeking approval to delegate the preparation and submission of documents to the Planning Inspectorate in relation to Nationally Significant Infrastructure Projects to the Strategic Director of Regeneration and Environment and Cabinet Member of Transport, Jobs and the Economy.
- 3.7 The Council's Constitution pre-dates the submission of the Whitestone Solar Farm proposal which is a Nationally Significant Infrastructure Project. Accordingly, it is necessary to determine the governance of this and any future NSIP's.
- 3.8 The timescales set by the Planning Inspectorate to respond to each phase of the NSIP process are immovable and would therefore not align with current lead times for cabinet or planning board approval.
- 3.9 The Government therefore advise Local Authorities to set up clear delegation early on the pre-application stage of the process to meet their demanding timescales and state in their advice note *"there is unlikely to be time to seek committee approval for submissions during the examination stage. It is important therefore that local authorities consider the level of approval required for these activities. They should arrange agreed powers at Cabinet as early as possible during the pre-application stage to enable officers to respond quickly and effectively"*.
- 3.10 Having regard to this and the lack of any reference to NSIP's in the Council's Constitution, it was considered necessary to set out clear governance practices for this current and future NSIP.
- 3.11 After careful consideration, Cabinet resolved to approve the delegation of documents to the Planning Inspectorate to the Strategic Director of Regeneration and Environment and Cabinet Member of Transport, Jobs and the Economy. However, an additional recommendation was made that quarterly reports were presented to Planning Board to provide updates on progress.

Affected Ward and Planning Board Member Briefing

- 3.12 Following the commencement of the statutory consultation period, an informal briefing session was organised for elected members representing the wards impacted by the proposals, as well as members of the Planning Board. The session was held on 22 October and delivered in a hybrid format, accommodating both in-person attendance and participation via Microsoft Teams.
- 3.13 The meeting was chaired by Councillor Williams and attended by Nigel Hancock and Lisa Brooks from the Planning service. Its primary purpose was to provide an overview of the NSIP process, which differs substantially from the conventional

planning application procedure. The session included a presentation outlining the NSIP process, followed by question and answers.

- 3.14 The session was well attended, and feedback received from participants was positive, particularly in relation to the clarity and relevance of the information presented.

Comments on the Draft Environmental Impact Assessment

- 3.15 More recently, and as part of the statutory consultation phase, RMBC were asked for formal comments on the draft Environmental Statement, which the developers published on their website here: [Document Library - Whitestone Solar Farm](#). Following a full and robust review of this lengthy document, the LPA, in consultation with Cabinet Member for the Economy and Jobs and the Strategic Director for Regeneration and Environment produced a detailed response outlining the main concerns. The full response can be found via this [link](#), however the main point are provided below:

- Biodiversity and Nature Conservation: The ES fails to adequately assess impacts on designated Local Wildlife Sites (LWS), including Brampton Common, and lacks sufficient detail on habitat mitigation and long-term land management. RMBC recommends the removal of solar arrays from sensitive ecological areas and calls for greater transparency in biodiversity planning.
- Landscape and Visual Impact: The development is expected to cause significant visual changes, particularly in rural areas. RMBC highlights the need for improved visual impact assessments, including photomontages, and raises concerns about the use of high fencing and surveillance equipment in open countryside.
- Cultural Heritage and Archaeology: The proposal may result in harm to multiple designated heritage assets, including Grade I and II* listed buildings and Scheduled Ancient Monuments. RMBC requests further archaeological evaluation and detailed visual evidence to assess the full extent of potential impacts.
- Ground Conditions and Land Quality: RMBC strongly opposes cable routing through Maltby Landfill due to risks to containment systems and nearby receptors. Additional concerns are raised about proximity to Kiveton Park Landfill and the lack of detail on BESS locations and ground stability.
- Water Resources and Flood Risk: The Council considers the flood risk assessment methodology to be robust but requests confirmation of compensatory flood storage volumes and detailed surface water drainage strategies.
- Climate Change and Carbon Assessment: While the project aligns with national decarbonisation goals, RMBC identifies inconsistencies in energy output and carbon savings calculations. The Council recommends improved transparency on lifecycle emissions, battery recycling, and climate risk management.
- Traffic, Noise, and Public Access: Construction activities may disrupt Public Rights of Way and local roads. RMBC seeks collaboration on routing, access, and public safety, and recommends revised working hours and active monitoring to mitigate noise and vibration impacts.

- Socio-Economic and Land Use Impacts: The ES lacks a clear strategy for minimising agricultural land loss and does not commit to local employment, training, or community benefit. RMBC recommends the development of a Local Employment and Skills Plan, a Community Benefit Strategy, and a separate Health Impact Assessment.

4.0 Next Steps within the Pre-Application Phase (Immediate term)

Adequacy of Consultation

- 4.1 Before submitting a Development Consent Order (DCO) application to the Planning Inspectorate (PINS), applicants are legally required to undertake consultation on their proposals which as previously stated was carried out between the 16th September and 28th October. The duration of this preparatory and consultative phase usually depends upon on the project's scale and complexity; however, the minimum statutory requirement is 4 weeks. The Government places significant emphasis on engaging in pre-application consultations as they consider that it presents the most effective opportunity to influence a project, whether to support, oppose, or suggest improvements.
- 4.2 It is noted that local residents, Parish Council's and community groups have expressed concern regarding the consultation process, citing that insufficient in person events have taken place and errors on publications relating to the free post address have resulted in a perceived lack of consultation or fear that responses are not being received.
- 4.3 The Council acknowledges this and prior to accepting the DCO, PINS are required to consult RMBC and CDC on the Adequacy of Consultation. This will provide the Council with an opportunity to feedback these concerns. Thereafter the Inspector will take a view on whether the consultation meets the statutory requirements and whether to accept the DCO or reject it on the grounds of insufficient consultation.
- 4.2 In this regard and according to PINS Advice Note Two, the pre-application stage is a critical phase for all stakeholders. It is a statutory requirement that developers consult with local authorities, statutory consultees, and the public. Local authorities are consultees and are encouraged to engage directly with developers on matters of local interest.

Development Consent Order (DCO)

- 4.3 Neither RMBC nor CDC have had sight of the draft DCO at this current time. Timescales are unclear of when this will be submitted for comment, however officers will continue to press the applicant for this and once received it will be circulated to relevant internal departments, including legal representatives for comment. Liaison with the applicant will thereafter continue to feedback any relevant concerns, ensuring that they align with national Policy Statements and guidance.

Local Impact Report (LIR) and Statement of Common Ground (SOCG)

- 4.4 The pre-application process should be used to gather information that will inform the Local Impact Report (LIR) and any Statement of Common Ground (SoCG). A proactive approach at this stage is seen to help reduce resource pressures during the formal Examination phase.
- 4.5 The Local Impact Report (LIR) is a critical document in the Development Consent Order (DCO) process. It is report written by the LPA that outlines the anticipated effects of the proposed development on the local authority's area. As a technical and evidence-based assessment, the LIR is required to address all topics the local authority deems relevant to understanding the development's impact. It serves as a formal mechanism for the authority to present its local knowledge and evidence on pertinent issues to the Planning Inspectorate (PINS). The LIR also provides an opportunity for the authority to articulate how local planning policies relate to the proposed development. Its primary function is to inform the examining authority of the potential local impacts, supported by the authority's unique insight and expertise. The report is likely to cover topics such as:
- Landscape and Visual Impact
 - Ecology
 - Heritage
 - Flood Risk
 - Agricultural Land Classification
 - Socio-Economics
- 4.6 This list is not exhaustive, and the deadline for submission of this report is likely to be required at short notice, however Government guidance suggests that Council's should begin the preparatory work once they have sight of the final Environmental Statement and draft DCO. Officers
- 4.7 It is important however to note that there is no need for the Council to prepare a balancing exercise between the impacts, this is the role of PINS when considering the proposals.
- 4.8 Having regard to the Statement of Common Ground (SoCG), PINS will set deadlines for submission of the SoCG in a post Preliminary Meeting letter; however, early submission is encouraged by Government. A final SoCG is expected to be submitted at the final deadline of the examination. Usually, the SoCG begins with few items agreed, and as the examination progresses more items may become agreed and therefore removed from the document. This final version is often signed by both parties.

4.9 Generally, a SoCG sets out matters on which the applicant and another party or parties agree and identifies those areas where agreement has not been reached.

4.10 Again, timescales for submission of the LIR and SoCG are unknown at this time given we are not yet at this stage of the process.

5.0 Conclusion

5.1 As a Nationally Significant Infrastructure Project (NSIP), Whitestone is subject to a multi-phased planning process, with RMBC playing a key statutory consultee role.

5.2 To date, RMBC has actively engaged in the pre-application phase, providing detailed feedback on environmental and technical aspects. The Council has also taken proactive steps to ensure governance arrangements are in place to meet the demanding timelines set by the Planning Inspectorate, including the delegation of responsibilities and the establishment of quarterly reporting to Planning Board.

5.3 While the project has evolved in response to initial consultation feedback, concerns remain regarding biodiversity, landscape impact and cultural heritage. ,RMBC will continue to advocate for improvements and safeguards through its contributions to the Local Impact Report (LIR), Statement of Common Ground (SoCG), and ongoing dialogue with the applicant.

5.4 As the project progresses toward formal application submission in Spring 2026, RMBC remains committed to ensuring that environmental standards are represented, and the development aligns with both national policy and local priorities.

5.3 Further reports on progress will be presented to Planning Board on a quarterly basis.