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## **ANSTON PARISH COUNCIL – ADEQUACY OF CONSULTATION**

Dear Sir/Madam,

### **Re: Whitestone Solar Farm – Adequacy of Consultation**

Anston Parish Council writes to formally raise concerns regarding the adequacy of consultation undertaken by Whitestone Solar Farm Ltd across both the earlier statutory consultation and the recent targeted consultation.

In assessing adequacy, it is essential to consider whether affected communities have been properly informed and given a genuine opportunity to understand the proposals and respond to them. The Parish Council does not consider that this has been achieved.

The impacts identified within this response relate directly to Anston and its residents.

### **EXECUTIVE SUMMARY**

The Whitestone Solar Farm proposals will have direct and significant impacts on residents of Anston Parish.

At present, insufficient information has been provided across the consultation process to enable these impacts to be properly understood or assessed. The nature and extent of the proposed works are not clearly defined, including a lack of detail on traffic management, construction activity, environmental effects and the precise routing of infrastructure.

In addition, the consultation material does not reflect the scale and complexity of key elements of the scheme, including trenchless crossings beneath major infrastructure such as the railway and canal, or the introduction of construction access within sensitive residential locations such as Crowgate. The absence of this information further prevents a clear understanding of the nature and extent of the proposed works.

There is also a lack of clarity and consistency in the information presented, creating uncertainty as to how the proposals affect Anston and its residents. This is particularly concerning given the absence of any dedicated consultation engagement within Anston, despite the scale and proximity of the proposed works.

While the applicant states that statutory consultation requirements have been met, compliance with minimum legal duties does not in itself demonstrate that consultation has been adequate. In Anston, where the proposals will have direct and significant impacts, there has been no dedicated engagement and many residents remain unaware of the scheme. Under the Planning Act 2008, there is a clear requirement to consult the local community in a way that is proportionate to the scale and impact of the development.

The Parish Council therefore considers that the consultation has not been proportionate to the level of impact on the community and does not meet the requirements of the Planning Act 2008 or the Government Guidance on the Pre-application Process Consultation.

## **1. Lack of effective engagement and coverage**

Whitestone Solar Farm is a project of significant scale, extending across a wide geographic area. However, the consultation has not effectively reached affected communities, including the local area.

No consultation event was held within Anston at any stage of the process, despite the clear and direct impacts on the parish. This has limited the ability of residents to engage with the proposals, and many remain unaware of how they may be affected.

More broadly, consultation coverage has been limited, with no clear explanation of how event locations were selected and no evidence of effective engagement within the local area. The consultation material also does not clearly explain how consultation notification areas were determined or how communities affected by traffic, visual and infrastructure impacts beyond the immediate site boundary were identified and included.

The suggestion that consultation events were held within a 15-minute drive of affected communities does not demonstrate effective engagement. Proximity alone does not ensure awareness, accessibility or meaningful participation — particularly where no direct consultation engagement has taken place within Anston despite the scale of impact.

The applicant has stated that approximately 718 people attended consultation events across the wider Whitestone 1, 2 and 3 area. Given the scale of the project, this figure appears low, and no breakdown has been provided to demonstrate whether the local area was meaningfully engaged.

The Parish Council therefore considers that the consultation has not been proportionate to the scale or distribution of impacts and has not effectively engaged affected communities.

## **2. Targeted Consultation – lack of clarity, accessibility and fairness**

The Parish Council has significant concerns regarding the clarity, accessibility and fairness of the recent targeted consultation process.

Public-facing information suggested that residents were able to submit feedback. However, it was indicated separately that responses may only be considered from defined stakeholders. This creates a clear inconsistency between what has been presented publicly and how the consultation appears to have been applied in practice.

Residents have also reported difficulty obtaining consultation materials, including paper copies, and uncertainty as to whether their responses would be considered. This has caused confusion within the community and undermined confidence in the consultation process.

The Parish Council also objects to the limitation placed on this consultation which seeks to restrict responses to specific numbered changes. For a statutory consultation, this approach prevents consultees from raising wider material considerations and undermines the ability to respond fully to the impacts of the development.

Directing consultees to access key information via a project website does not in itself discharge the duty to consult, particularly where information is complex, fragmented or not clearly signposted.

Important supporting information and consultation materials were not consistently provided directly to affected parties, despite being necessary to understand and assess the proposals. This limited the ability of residents and stakeholders to properly review the information within the consultation period.

The time frame provided for responses was also very limited, with the final submission date falling on a bank holiday (Good Friday), further restricting the ability of consultees to engage meaningfully. Concerns regarding the limited consultation period and requests for additional time from Parish Councils were not accommodated, despite the scale and complexity of the material being consulted upon.

In addition, the targeted consultation has resulted in changes to the scheme that have not been clearly identified within the numbered consultation areas. This includes the apparent removal of alternative cable route options and the removal or downgrading of previously proposed screening and mitigation measures.

These changes materially affect the impact of the proposals, particularly in relation to proximity to residential properties, visual effects, impacts during construction and landscape impact. However, they have not been presented in a clear or transparent way within the consultation material.

As a result, consultees have not been given a clear opportunity to understand or comment on these changes, which further undermines the adequacy and fairness of the consultation process. This has created a situation where material changes affecting residents have not been subject to clear or effective consultation.

It is also not clear how the adequacy of consultation can be considered established while further statutory consultation is ongoing and while material changes and new information continue to emerge.

### **3. Inconsistency between consultation stages**

There is a clear inconsistency between earlier consultation material and the proposals now being progressed.

While earlier consultation material presented more than one potential cable route linking Whitestone 2 and 3, it did not clearly explain how a preferred route would be selected or the relative impacts of each option.

The Parish Council has been informed by a resident who attended the Todwick consultation event that attendees were advised the cable route further from residential properties, between the A57 and Kiveton/Harthill, would be taken forward. The route now presented in the targeted consultation instead follows the alignment directly behind the houses to the west of South Anston and at the top of Crowgate. No explanation has been provided as to why this route has been selected or whether alternatives have been properly considered. This represents a clear and material shift in impact which has not been transparently communicated.

The Parish Council also notes the removal of previously proposed tree planting mitigation opposite Penny Piece Lane and Cramfit Road, which has now been downgraded to grass.

Grass provides no meaningful visual screening and does not mitigate the visual impact on elevated properties overlooking the site. The original tree planting recognised the need to reduce visual intrusion from higher ground, break up views of infrastructure, and provide long-term landscape integration.

The removal of this mitigation represents a clear reduction in environmental and visual protection and materially increases the level of visual harm. No explanation has been provided for this change.

These are material changes in impact that have not been transparently presented or justified.

### **4. Lack of clarity and evolving proposals**

Across all consultation stages, key elements of the scheme remain unclear or subject to change.

These include:

- cable routes
- construction access routes



- traffic management arrangements
- construction methods
- environmental mitigation measures

In addition:

- environmental assessments remain ongoing
- information relevant to specific areas is spread across multiple documents

Residents are therefore being asked to comment on proposals while elements of the environmental assessment and supporting evidence remain incomplete or subject to ongoing revision. The proposals are not sufficiently defined to allow a clear understanding of their impacts.

The use of undefined cable corridors means the actual working width and extent of land required is unclear. This makes it impossible to determine the true extent of land take, disruption and environmental impact.

The consultation material presents cable installation as relatively limited trenching works. However, the scale of temporary works required to facilitate construction is not clearly communicated. This is likely to include haul roads, material import and export, plant access and ground reworking across substantial lengths of the route and will involve substantial vehicle movements, land disturbance and construction activity. The true extent of construction activity, land disturbance and disruption has not been clearly communicated to consultees.

There is also no information provided on the location of construction compounds, storage areas or site logistics. These elements can have significant additional impacts in terms of land take, traffic and disturbance, and without this information the overall impact cannot be fully understood.

There is no clear information provided on how key road crossings, including the A57 and Crowgate, will be undertaken, whether by trenching, directional drilling or other methods. Without this detail, it is not possible to understand the extent of disruption, traffic management requirements or safety implications.

There is also insufficient information provided on the impact of the proposals on public rights of way. This includes the bridleways around Axle Lane, the bridleway from South Anston to the canal, and the footpath running alongside the canal, all of which are heavily used by residents for both recreation and everyday access between communities.

The consultation material does not clearly explain whether these routes will remain open, be diverted or closed during construction, how users will be safely managed, or the duration of any disruption. Given the scale of works and plant movement likely to be involved, it is probable that these routes will be significantly affected or unusable during construction. This level of disruption has not been clearly communicated.

There is also no information provided on how proposed works will interact with existing underground services, including gas, water, electricity and telecommunications infrastructure. Without this detail, it is not possible to assess the extent of additional works, disruption or risk.

The consultation material does not clearly set out the extent of hedgerow removal required to facilitate the works, or how this loss will be mitigated.

There is also limited information on the long-term impact of buried cables on agricultural land use, including potential restrictions on cultivation, drainage and land management.

It is also not clear that the claimed reduction in the scheme represents a reduction in the extent or intensity of infrastructure, particularly where generating capacity remains unchanged. This creates further uncertainty as to the true scale of the development.

The proposed cable route will require crossings beneath significant infrastructure, including a railway line, canal and associated watercourses. These are likely to require trenchless methods such as horizontal directional drilling at depth.

No information has been provided on the proposed method, depth, alignment or ground conditions for these crossings. Works of this nature are specialist engineering operations requiring significant plant, large working areas and detailed design. The consultation material does not reflect the likely scale or complexity of these works, including the need for launch and reception pits, plant access and working space.

In an area with known mining legacy and variable geology, this raises further concerns regarding ground stability, settlement risk and potential impacts on critical infrastructure. In the absence of this information, it is not possible to understand or assess the risks or impacts associated with these crossings.

Key information is therefore either missing, unclear or dispersed across multiple documents, making it difficult for residents to understand the proposals in a clear and coherent way.

## **5. Lack of information regarding the A57 and impacts on Villages**

The Parish Council has significant concerns regarding the limited information provided in relation to the A57.

The consultation material identifies land along this corridor for access and works, with solar panels also shown in close proximity to the A57. However, there is no clear detail on:

- how access onto the A57 will be designed or managed
- the scale and routing of construction traffic
- the extent of traffic management measures

Given that the A57 is a busy strategic route, this lack of information prevents any meaningful assessment of potential impacts on safety and congestion.

The introduction of construction traffic, temporary speed restrictions and access points on the A57 is likely to result in increased congestion. As a result, traffic is likely to divert onto surrounding local roads through Anston and neighbouring villages.

The village roads are not designed to accommodate increased traffic volumes or heavy goods vehicles. The introduction of construction traffic through residential areas raises significant concerns regarding:

- road safety for pedestrians, including children
- increased interaction between vehicles and vulnerable road users
- the suitability of local roads for large construction vehicles
- noise, disturbance and general disruption to residents

This represents a clear and direct impact on the local community, which has not been properly assessed or communicated within the consultation material.

No updated glint and glare assessment has been provided for panels located adjacent to the A57. Without this information, it is not possible to understand the potential effects on driver visibility and road safety.

The consultation material also does not address foundation design, piling requirements, ground investigations, or how risks associated with mining legacy and potential subsidence have been assessed. In the absence of this information, it is not possible to understand whether there is any risk to the stability or integrity of the A57 or associated infrastructure.

In addition, the proposed construction access points at the top of Crowgate raise specific concerns. This is a residential area with regular pedestrian activity, including children accessing adjacent recreation areas and school transport routes.

The introduction of construction access and associated vehicle movements in this location will significantly increase the interaction between construction traffic and pedestrians. This creates a clear safety risk, particularly for children and other vulnerable users.

The consultation material does not provide sufficient detail on how access will be designed, how traffic will be managed, or what measures will be put in place to ensure safety in what is a sensitive residential environment.

In the absence of this information, it is not possible to assess the extent of disruption, the level of risk, or the suitability of this location for construction access.

This represents a clear example of how key impacts on residents have not been properly explained within the consultation.

The consultation material also does not clearly explain how cumulative impacts arising from traffic, construction activity and other committed developments in the wider area have been assessed.

## **6. Lack of information on ecology and wildlife impacts**

The Parish Council also has concerns regarding the limited information provided on ecological impacts.

The consultation material does not provide sufficient detail to understand the potential effects on local habitats and species.

For example, records indicate that around 30 red-listed bird species, together with bats and barn owls, have been observed at Axle Lane and the surrounding area. Barn owl boxes are also located within areas identified for solar panels along the A57 corridor. The Axle Lane area, Anston Brook and the canal and railway corridor together function as important wildlife corridors containing established hedgerows, woodland, watercourse habitats and ecological connectivity which may be affected by the proposals and associated construction activity.

However, there is no clear information on:

- How these species and habitats have been assessed
- the extent of potential disturbance, fragmentation or habitat loss
- how impacts during construction and operation will be avoided or mitigated

This lack of detail prevents any meaningful understanding of the potential ecological effects of the proposals.

## **7. Lack of information on flood risk and drainage**

Insufficient information has been provided in relation to flood risk and drainage.

The consultation material does not clearly explain:

- existing drainage conditions
- how construction activities may affect surface water flow
- what mitigation measures are proposed

There is also insufficient information regarding potential impacts on groundwater and underlying aquifers arising from deep trenchless crossings, drilling activity or ground disturbance.

Given the scale of ground disturbance proposed, including trenching and the introduction of imported materials, this prevents any meaningful assessment of flood

risk. There is also a risk that such works could alter natural drainage patterns or create preferential pathways for water movement through the ground.

This is of particular concern in relation to Anston Brook, which receives drainage from surrounding land. Changes to runoff rates, infiltration or subsurface flow could increase flood risk or affect water quality downstream.

The Parish Council also notes that recent tree planting has been undertaken along Anston Brook by Nottinghamshire Wildlife Trust in partnership with Anston Parish Council, specifically to help reduce downstream flood risk, including in Worksop. The consultation material does not explain how the proposed works will interact with or potentially undermine these measures.

In addition, the Anston Stones Site of Special Scientific Interest (SSSI) is hydrologically connected to the brook and may be sensitive to changes in water flow and quality. No clear assessment has been provided of the potential effects on this designated site.

## **8. Ground conditions, mining legacy and subsidence risk**

There is insufficient information provided on ground conditions and the implications of historic mining across the area.

The consultation material does not clearly explain:

- how mining legacy has been assessed
- what ground investigations have been undertaken
- how foundation design responds to these conditions
- the potential effects of excavation, trenching and vibration

There is also no evidence that sufficient feasibility assessment has been undertaken to demonstrate that proposed construction methods are suitable for the ground conditions present.

The local geology, including limestone, Coal Measures and historic mining activity, may significantly affect the feasibility and complexity of trenching and trenchless crossing methods. However, no clear information has been provided on how these constraints have informed the proposed construction approach.

In the absence of this information, it is not possible to assess the risk of ground movement, subsidence or impacts on infrastructure.

## **9. Lack of information on fire risk and emergency response**

No clear information has been provided regarding fire risk or fire management.

The proposals involve extensive electrical infrastructure across a wide area, yet there is no detail on:

- fire risk assessment
- prevention or containment measures
- emergency access
- incident response

This omission prevents any assessment of risks to public safety, infrastructure and the surrounding environment.

## **10. Volume and complexity of documentation**

The consultation is supported by a large volume of technical documentation.

However:

- information is spread across multiple documents
- local impacts are not clearly summarised

The Non-Technical Summary does not sufficiently explain in plain language how the proposals may affect residents, communities and day-to-day life within affected areas. The scale, technical complexity and fragmented nature of the documentation creates a practical barrier to participation for ordinary residents without specialist knowledge or professional support. This limits meaningful engagement.

## **11. Accuracy of consultation information**

There are concerns that elements of the consultation material may not fully reflect current conditions or likely impacts.

This includes:

- reliance on potentially outdated baseline information
- mitigation presented without clear supporting detail
- limited representation of residential viewpoints

## **Conclusion**

For these reasons, Anston Parish Council considers that the consultation process is inadequate.

The proposals have not been presented in a way that allows affected communities to clearly understand or respond to them. This is particularly evident in relation to key issues such as A57 highway impacts, safety and impact on village roads, fire risk and emergency response, ecology, flood risk and ground stability, where insufficient information has been provided to enable proper assessment.

The selection of the cable route closest to residential properties, without explanation, represents a clear and material change in impact that has not been transparently presented or justified.

The level of technical detail provided does not demonstrate that the proposed construction methods are feasible within the constraints of the site. In particular, there is no clear evidence that complex works such as trenchless crossings beneath the railway and canal, or construction access within constrained residential locations, can be delivered safely or without significant impact. This further limits the ability of consultees to understand the true extent of the works or their potential impacts.

These concerns are not isolated. Similar issues have been raised more widely, including by the local Member of Parliament, particularly in relation to incomplete environmental assessments, highway safety risks and the adequacy of the evidence base. This reinforces the view that the consultation has not provided a sufficiently clear, robust or transparent basis for informed engagement.

Taken together, the absence of key information, the inconsistency between consultation stages, and the lack of meaningful local engagement mean that affected residents have not been given a fair, proportionate or effective opportunity to understand or respond to the proposals. This has significantly limited the ability of many affected residents to participate meaningfully in the consultation process.

The Applicant should be required to have regard to these concerns and ensure they are accurately reflected in the Consultation Report. The Parish Council therefore requests that:

- full and finalised details of the scheme are provided;
- all changes between consultation stages are clearly explained;
- the rationale for key decisions, including route selection, is clearly set out; and
- proper and accessible consultation is undertaken with affected communities, including within Anston, before the proposals are progressed further.

The Parish Council reserves the right to provide further comments should additional information or amendments emerge.

Yours faithfully

Anston Parish Council





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**To: Rotherham Council – Lisa Brookes**  
**South Yorkshire Mayor – Oliver Coppard**  
**Member of Parliament – Jake Richards**

**Date: 19<sup>th</sup> May 2026**

**Whitestone Solar Farm – Targeted Consultation Response (Anston Parish Council)**

**Whitestone 2 - Changes 19a, 19b, 20, 21, 22, 23 and Associated Cable Routes**

**Executive Summary**

The proposed changes affecting Anston Parish will have direct and significant impacts on residents, including increased traffic and safety risks, disruption to residential areas, loss of environmental mitigation, and effects on ecology and wildlife.

At present, there is insufficient information provided within the targeted consultation to enable these impacts to be properly understood or assessed, and the nature and extent of the proposed works within each change area are not clearly defined. This includes a lack of detail on traffic management, construction activity, environmental effects and the exact routing of infrastructure.

There is also a clear inconsistency between the consultation information presented publicly and the approach being applied in practice, which is resulting in confusion and uncertainty as to whether responses from affected residents will be taken into account. This is particularly concerning in Anston, where there has been no dedicated consultation engagement at any stage of the process, despite the significant and direct impacts on the area.

Dear Sir/Madam,

We are writing to set out our concerns in relation to the current targeted consultation where the proposed changes affect Anston and its residents.

The proposed changes will have direct and significant impacts on the parish, including increased traffic and safety risks, effects on residents, and environmental and ecological harm. However, there is insufficient information provided to properly assess these impacts, and the consultation process itself lacks clarity and transparency.

Our concerns are set out in detail below.

## **1.0 Change 19a & 19b – Cable Routes West of North Anston**

The proposed cable routes to the west of North Anston will bring construction activity into the area and increase pressure on the local road network. This will inevitably lead to increased congestion and traffic diverting onto roads that are not suitable for that level or type of use.

In particular, roads such as Penny Piece Lane and Cramfit Road are likely to be affected. These are narrow roads with limited visibility and are regularly used by pedestrians, cyclists and horse riders. They are not suitable for increased traffic, particularly HGVs, and the likely diversion of vehicles onto these routes creates a clear safety concern.

These roads also experience ongoing infrastructure issues, including water main failures that require excavation and temporary closures. Increasing traffic and pressure on these routes increases the risk of disruption and access problems for residents.

There is also existing pressure on the local road network in this area associated with the Magilla Waste Recycling Centre on Common Road, where traffic regularly queues in both directions to access the site. As Cramfit Road connects directly into Common Road, this demonstrates that the surrounding network is already operating under significant strain. Additional traffic associated with the proposed development will exacerbate congestion and increase safety risks on roads that are not suitable for increased volumes.

There are also concerns about the impact on historic parts of Anston.

Main Street is a historic part of the village, with listed buildings and a designated conservation area. Many of these buildings are very old and were not built to withstand modern traffic, particularly heavy vehicles.

If traffic is pushed onto these routes as a result of congestion on the A57, it is likely to increase vibration and place additional stress on these buildings, with potential for structural damage. The narrow nature of the road and the proximity of buildings to the carriageway also increases the risk of vehicles passing too close to buildings or struggling to pass safely.

This is a foreseeable consequence of increased traffic and has not been properly considered.

There are also ecological concerns in this area. Barn owl boxes are located nearby, indicating the presence of protected and sensitive species. Construction activity has the potential to disturb these habitats and affect wildlife. More generally, the impact on ecology and biodiversity has not been properly assessed.

In addition, Changes 19a and 19b require the use of additional land for access, resulting in further loss of high-grade agricultural land. This represents a permanent loss of productive farmland and raises concerns as to whether the extent of land take has been minimised or appropriately justified.

## **2.0 Change 20 – A57 Access**

The A57 is a major trunk road and a key commuter route, used by a high volume of traffic travelling through and around Anston. It is already a very busy and constrained route, with congestion a regular issue, particularly at peak times.

The proposed access arrangements and construction activity will make this worse. Reduced speed limits and traffic management measures will slow traffic down and reduce the capacity of the road. On a road that is already under pressure, this will lead to longer queues and increased delays.

As congestion builds, traffic will look for alternative routes, which will push more vehicles onto local roads within and surrounding Anston. This will increase pressure on roads that are not designed for that level of traffic and create further safety issues.

There are also existing road safety concerns on this stretch of the A57, with a number of serious accidents having occurred. This shows that the road is already a higher-risk environment.

Introducing construction traffic, together with traffic management measures such as reduced speeds, will increase congestion on an already constrained route and increase the risk of further incidents on a route that is already known to experience serious accidents. This has not been properly assessed.

In addition, the A57 is already under increasing pressure from other developments. The new distribution warehouse at Gateford will bring additional HGV traffic, and housing growth in nearby areas will increase the number of vehicles using the road. These combined impacts have not been properly considered.

There are also environmental impacts linked to this, including increased noise, poorer air quality and disturbance to nearby habitats.

The proposed access works will also require the removal of sections of established hedgerow. These hedgerows currently provide natural screening and form part of the existing landscape, as well as acting as wildlife habitat.

Their removal will increase the visual impact of the development and result in a loss of habitat. This is a further reduction in environmental value that has not been clearly set out or assessed.

It is also not clear how the cable will cross the A57. There is no information provided on whether this will involve trenching, directional drilling or other methods. Without this detail, it is not possible to understand whether the works will require excavation within the carriageway, road closures or temporary traffic management. Given the importance of this route and existing traffic pressures, this creates significant uncertainty around disruption and safety and has not been properly assessed.

There is no information provided on how the proposed crossing will interact with existing underground services within the highway, including gas, water, electricity and telecommunications infrastructure. Any crossing of a road of this nature is likely to encounter existing services, and without this detail it is not possible to understand whether diversions, protection works or additional excavation will be required. This has clear implications for disruption, safety and the duration of works, and has not been properly assessed.

There is no information provided on the type, scale or configuration of the solar panels in this location, and no glint and glare assessment has been presented. Without this information, it is not possible to assess the potential impact on drivers using the A57 or the effectiveness of any proposed mitigation, including landscaping or screening. The potential safety implications of glint and glare on a major and heavily used route have therefore not been properly assessed.

### **3.0 Change 21 – Crowgate Access**

The proposed works at Crowgate are particularly concerning because of how this area is used.

Crowgate is a residential area, but it is also where there is a recreation ground that is regularly used by children and families. There are pedestrian routes through the area and a school bus stop used by children.

The introduction of construction activity and additional traffic in this area creates a clear safety risk. Children are regularly moving around this area, whether going to the recreation ground, walking locally or using the bus stop. Bringing in larger vehicles and increasing traffic movements significantly increases the risk of accidents involving vehicles and pedestrians.

Crowgate also serves as a key route from Anston towards Kiveton Park and Wales, including the route to Wales High School. It is regularly used for school-related journeys, particularly during peak morning and afternoon periods.

Any disruption or additional congestion in this location will therefore have wider impacts beyond the immediate area, affecting daily travel patterns for residents across Anston. The introduction of construction activity, together with any restrictions on vehicle movement, is likely to increase congestion along this route and surrounding roads.

Residents in this area will also be directly affected by noise, dust, vibration and general disruption from the works.

As with other access points, this is also likely to involve the removal of existing hedgerow, resulting in further loss of natural screening and habitat.

Despite how sensitive this location is, there is no clear assessment of the impact on safety, on the recreation ground, or on residents. The environmental and wildlife impacts have also not been properly assessed.

It is also not clear how the cable will cross the road at this location. There is no information provided on whether this will involve trenching, directional drilling or other methods. Without this detail, it is not possible to understand the extent of disruption or the impact on traffic and safety in an area regularly used by residents and children.

There is also no information provided on how the proposed crossing will interact with existing underground services within the road, including gas, water, electricity and telecommunications infrastructure. Without this detail, it is not possible to understand the extent of works required or the resulting impact on disruption and safety.

Prolonged disruption to local routes also has the potential to affect local businesses and services which rely on access through the area. This has not been considered.

#### **4.0 Cable Route Between Changes 20, 21 and 22**

The cable route between the A57, Crowgate and through to Change 22 is one of the most concerning elements of the proposal.

In places, this route runs directly behind residential properties, bringing construction activity very close to homes. This will result in noise, dust, vibration and prolonged disruption, directly affecting residents' day-to-day lives as well as having a detrimental visual impact.

This route also crosses Axle Lane, which is a well-used bridleway used by walkers, dog walkers, horse riders and cyclists. The area also includes a fishing pond and woodland, making it an important recreational and ecological space.

Construction activity in this location raises clear safety concerns for users of the bridleway and will significantly disrupt its use.

There are important landscape features along Axle Lane, including established dry stone walling and mature hedgerow. These are long-standing features of the local landscape and provide both natural screening and valuable wildlife habitat. Local bird groups have also undertaken additional planting in this area to support bird populations.

There is no clear assessment of how these features will be affected or how any loss will be mitigated.

There are also clear ecological impacts, with the presence of almost 30 red-listed bird species and deer. The area functions as a wildlife corridor, and the proposed works risk disturbing these habitats and fragmenting wildlife movement.

Furthermore, there are known historic mining activities in this area. In the absence of any assessment of ground conditions, it is not clear whether vibration associated with construction activity could give rise to ground instability or subsidence risk. This represents a potential risk to nearby infrastructure, landscape features and residential areas which has not been addressed, particularly in relation to the stability of ground beneath roads, utilities and nearby residential properties.

There is also no information provided to confirm whether areas affected by ground disturbance, including cable installation and access works, have been subject to any archaeological assessment. Given the extent of excavation and the use of wide and undefined working corridors, it is not possible to determine whether previously unidentified archaeological features could be affected. This has not been addressed.

Importantly, it is not clear why this route has been selected. The alternative route presented in the previous consultation moved the cable route further away from residential properties, where it would have been more effectively screened by existing landform and topography. This would have reduced both visual and residential impact.

No explanation has been provided as to why the route was not taken forward, or whether alternative options were properly considered. As it stands, the chosen route results in direct and avoidable impacts on residents.

It is also understood that at a consultation event in Todwick, residents were advised that the cable corridor would follow the alternative route located further towards Todwick. On that basis, concerns were not raised at the time, as the route presented did not directly affect nearby housing. The alignment now proposed runs significantly closer to residential properties. This raises concerns that information provided during earlier consultation events did not reflect the scheme now being progressed, and that residents have not had a clear and consistent understanding of the proposals.

There is also a lack of detail about the exact route, how the works will be carried out and how long they will take. The use of undefined cable corridors means the actual working width and extent of land required is unclear. This makes it impossible to determine the true extent of land take, disruption and environmental impact. Without this information, it is not possible to properly understand or assess the full impact.

There is also no information provided on whether public rights of way and permissive routes will be retained, diverted or temporarily closed during construction, or the duration of any such disruption. This limits the ability to assess the impact on public access and connectivity.

## **5.0 Changes 22 & 23 – Additional Land and Infrastructure**

These changes extend the footprint of the development and increase its impact on Anston.

There is insufficient detail on the extent of the land involved, the nature of the works and the likely resulting impacts on residents and the environment.

There is also a well-used bridleway in this area connecting down towards the canal. This route is regularly used by walkers, cyclists and horse riders. The proposed changes have the potential to affect access and safety along this route, both during construction and potentially longer term.

These impacts have not been clearly assessed or explained.

## **6.0 Removal of Tree Mitigation**

A further concern is the removal of the proposed tree mitigation opposite Penny Piece Lane and Cramfit Road, which now appears to have been reduced to grass.

This materially increases the visual impact of the development, particularly for elevated properties overlooking the site, and removes previously identified mitigation.

It also has implications for surface water management and flooding, particularly given existing local issues. Tree planting plays an important role in slowing runoff, and its removal risks exacerbating these issues.

This is particularly concerning given local tree planting efforts undertaken by Anston Parish Council and Nottinghamshire Wildlife Trust to support flood mitigation in the area.

This change has a clear and direct impact on nearby residents, yet it is not clearly identified within the listed consultation changes. At the same time, it has been confirmed that feedback at this stage will only be considered from a defined group of stakeholders. This creates a situation where a material change affecting residents is not clearly presented as part of the consultation, while those same residents are not being given a meaningful opportunity to comment on it.

There are also concerns that landscape and visual assessments may be based on outdated or inaccurate baseline conditions, particularly where existing vegetation previously assumed to provide screening is no longer present.

## **7.0 Common Issues**

Across all of these changes there are consistent and significant impacts on residents, including increased traffic, safety risks, noise, dust, vibration and visual impact.

These proposals will directly affect people living in the area through disruption to daily life, particularly where works are taking place close to residential properties and along well-used local routes and bridleways. The safety of residents, including children, pedestrians and other vulnerable road users, is a key concern and has not been properly assessed.

There are also clear and recurring impacts on the local highway network, including increased congestion, diversion of traffic onto unsuitable roads and wider effects on surrounding routes.

In addition, there are ongoing concerns regarding impacts on ecology and wildlife. These include the loss of hedgerows and habitat, disturbance to protected and sensitive species, and disruption to established wildlife corridors.

There is no information provided on how surface water, drainage and potential pollution risks will be managed during construction. Ground disturbance and excavation have the potential to alter drainage patterns and increase runoff or sediment transfer. In the absence of this information, the impact on the local water environment cannot be assessed.

There is also no information on the location of construction compounds, storage areas or site logistics. These elements can have significant additional impacts in terms of land take, traffic and disturbance, and without this information the overall impact cannot be fully understood.

In relation to the proposed cable routes, the presence of buried cables is likely to impose long-term restrictions on agricultural use, including limitations on deep cultivation, drainage works and the planting of deep-rooted crops. This raises concerns as to whether land can genuinely be returned to its previous use.

Despite the consistency and significance of these impacts, there is a lack of key information across all changes, including traffic management plans, construction detail, environmental assessments and cumulative impact assessments.

Without this information, it is not possible to properly understand or assess the full extent of the impacts on residents, the local environment or the wider area. This includes uncertainty around construction methods, ground disturbance and interaction with existing infrastructure, which further limits the ability to assess potential risks and impacts.

## **8.0 Consultation Concerns**

The way this consultation has been carried out raises significant concerns.

The information presented on the Whitestone website gives the clear impression that members of the public are able to participate, including through the use of an online feedback form. There is no clear statement that responses from the wider public will not be considered.

However, it has been confirmed through correspondence with RMBC and Jake Richards MP that feedback at this stage will only be considered from a defined group of stakeholders. Residents who have contacted Whitestone directly have also been told that paper copies are only available to those on a designated list and that members of the general public are not entitled to receive them.

This approach also creates a practical barrier to participation for those who are less able to engage digitally, and limits the ability of affected residents to take part in the consultation in a meaningful way.

This creates a clear inconsistency between what is being presented publicly and how the consultation is being applied in practice.

As a result, residents are being led to believe they can submit feedback, when in reality it may not be taken into account. This is causing confusion locally, with both residents and Parish Councils unclear as to who is able to respond and whether those responses will be taken into account.

It is also evident that changes have been made which are not clearly identified within the listed consultation changes or numbered areas. As a result, it is not clear whether all amendments to the scheme have been presented, including changes that have a direct impact on residents but are not explicitly identified or presented for consultation.

This creates further uncertainty as to the full extent of what is being proposed and limits the ability of residents and stakeholders to understand and respond to the proposals in a meaningful and informed way. The consultation therefore does not provide a clear or complete picture of the changes that have taken place since the previous stage.

In addition, there has been no dedicated consultation engagement in Anston at any stage of the process, despite the scale of the impact on the area. Many residents remain unaware of the proposals and how they may affect them.

This is particularly concerning given that some of the changes now being proposed have direct impacts on residents, including changes that have not been clearly identified as part of the consultation.

Taken together, this does not represent a consultation process that is clear, transparent or proportionate to the level of impact on the community.

## **9.0 Conclusion**

The proposed changes will have significant and cumulative impacts on Anston, including increased traffic and safety risks, disruption to residents, environmental harm, loss of mitigation, and impacts on ecology and wildlife.

The proposed changes also represent an expansion of the scheme into additional areas and introduce new impacts that have not been clearly explained or assessed.

Many of these impacts appear to be avoidable, yet no clear justification has been provided for the approach taken, particularly where alternative options may have reduced the effects on residents and the local environment.

There is also insufficient information available to properly assess the proposals, including a lack of detail on traffic management, construction activity, environmental impacts and the full extent of the works.

Without this information, the proposals cannot be properly understood or assessed. In order to allow a proper assessment, the following information is required:

- Clear and precise details of access arrangements and the alignment of cable routes, including their relationship to residential properties, local roads and public routes.
- Full details of the proposed solar infrastructure, including panel type, height, scale and layout.
- A detailed explanation of how road crossings will be carried out, including at the A57 and Crowgate, and the resulting impact on traffic, safety and road users.
- Information on the location of existing underground services and how these will be managed or protected during the works.
- Confirmation of the extent of hedgerow removal and loss of established landscape features, together with full details of replacement planting and mitigation.
- A comprehensive construction traffic strategy, including routes, expected vehicle numbers and measures to manage impacts on local roads and communities.



- Updated environmental information covering noise, dust, vibration, visual effects, ecology and wildlife.
- An updated assessment of glint and glare, taking account of panel design and the potential impact on users of the A57 and surrounding areas.
- Visual information demonstrating how the development and mitigation will appear in practice, including views from residential properties and higher ground.
- An assessment of cumulative impacts, including existing traffic pressures and other committed development in the area.

It is also not clear that the claimed reduction in the scheme represents a reduction in the extent or intensity of infrastructure, particularly given that the overall generating capacity remains unchanged. This raises questions as to whether the actual impacts have been reduced in practice.

In addition, there has been no meaningful or dedicated consultation engagement in Anston at any stage of the process, despite the scale of the impact on the area. This, combined with the lack of clarity in the current consultation approach, means that affected residents have not been given a clear or effective opportunity to understand or respond to the proposals.

For these reasons, we consider that the current consultation is inadequate and that the proposals affecting Anston cannot be properly understood or assessed in their current form, and the proposed changes cannot be meaningfully assessed in isolation from the wider scheme. Further work is required, together with clear and complete information, and meaningful engagement with affected residents.

Yours sincerely



Clerk to Anston Parish Council.



# *ASTON-CUM-AUGHTON PARISH COUNCIL*



Parish Council Office  
Parish Hall Rosegarth Ave  
Aston SHEFFIELD S26 2DD

Clerk & Financial Officer  
[REDACTED]

Tele/Fax 0114 2879008  
E-mail – [admin@aston-pc.gov.uk](mailto:admin@aston-pc.gov.uk)

19 May 2026

Ms L Brooks,  
RMBC,  
Riverside House,  
Rotherham.

Dear Ms Brooks,

## **Whitestone Solar Farm – Adequacy of the Statutory Consultation Process**

Aston-cum-Aughton Parish Council writes to express serious concerns regarding the adequacy of the consultation process undertaken for the proposed Whitestone Solar Farm development.

In considering the statutory consultation under Section 42 of the Planning Act 2008, the Parish Council believes the key issue is not simply whether consultation has taken place procedurally, but whether affected communities have been given a fair, accessible and meaningful opportunity to understand the proposals and provide informed comment.

The Parish Council does not object to renewable energy in principle. However, we share the view that the consultation process for a project of this scale has fallen short of what would reasonably be expected for a Nationally Significant Infrastructure Project.

### **1. Accessibility and Awareness of Consultation**

The Council is concerned that the consultation has not been sufficiently accessible or effective in reaching all affected communities. Communication methods relied heavily on leaflet distribution and online materials, which many residents may not have engaged with or may have mistaken for commercial advertising.

Public engagement events were limited in number relative to the geographic scale of the scheme, which spans a wide area across multiple parishes. The distribution of events did not appear proportionate to the number of communities affected, and some areas with clear potential impacts were not provided with dedicated events.

Event timing also restricted participation, with limited evening and weekend availability and no formal presentations or structured question-and-answer sessions.

### **2. Geographic Scope and Notification Methodology**

The Parish Council has concerns regarding how consultation zones were defined and how residents were identified for direct notification. A proximity-based approach appears to have been used, which does not fully account for the wider impacts of a development of this scale, including traffic routes, landscape and visual effects, and associated infrastructure.

As a result, it is likely that some residents and neighbouring communities who may experience material impacts were not adequately informed or engaged.

### **3. Clarity and Completeness of Information**

The information presented during consultation has lacked clarity and consistency. Key elements of the development—including cable routes, substations, access routes and other infrastructure—have not been clearly defined, leaving residents unable to fully understand the extent and impact of the proposals.

In addition, there have been inconsistencies between information presented at public events and other materials, contributing to uncertainty within the community regarding the final extent of the scheme.

The heavy reliance on digital documentation, combined with the complexity and volume of technical material, has created further barriers to meaningful engagement, particularly for residents without easy access to online resources.

### **4. Adequacy of Engagement with Local Communities**

The Council is concerned that engagement with local communities has not been meaningful or proportionate to the scale of the development. Reports from consultation events suggest that representatives were unable to adequately address local concerns or provide clear answers on key issues.

Furthermore, the limited time available within the consultation period, combined with the scale and complexity of the documentation, has placed an unreasonable burden on parish councils and residents attempting to respond in an informed manner.

### **5. Overall Adequacy of the Consultation Process**

Taken together, these issues raise significant concerns as to whether the consultation process has met the standards required under the Planning Act 2008.

The Parish Council considers that the consultation has not provided a sufficiently clear, inclusive or proportionate opportunity for affected communities to understand the proposals and participate meaningfully in the process.

### **6. Construction Traffic and Local Highway Impacts**

The Parish Council is particularly concerned about the lack of clarity regarding construction traffic routes and their potential impact on Aston-cum-Aughton and surrounding areas.

At the time of consultation, no definitive haul routes or construction access strategies were clearly identified. Instead, multiple potential routes were indicated as “under consideration”, limiting the ability of residents and the Parish Council to properly assess likely impacts.

However, it is evident that a development of this scale will generate significant volumes of construction traffic, including HGV movements transporting equipment, materials and infrastructure components. In the absence of confirmed routes, it is reasonable to anticipate that key local corridors within and around Aston-cum-Aughton may be affected.

Particular concern arises in relation to:

- Increased HGV movements through local residential roads and village centres
- Impacts on already congested routes linking Rotherham, Sheffield and surrounding settlements
- Road safety risks for pedestrians, cyclists and school traffic

- Potential damage to rural roads not designed for sustained heavy vehicle use
- Cumulative impacts where construction traffic coincides with other major developments in the area

The consultation materials do not provide sufficient detail to allow the Parish Council or residents to understand:

- Which roads will be used for construction access
- The frequency and duration of construction traffic movements
- Whether any mitigation measures (such as traffic management plans or routing agreements) will be implemented

Without this information, consultees are unable to form an informed view on one of the most significant and immediate impacts of the proposed development.

Given the scale of Whitestone Solar Farm and its geographic spread, the Parish Council considers that clear, route-specific traffic information should have been provided as part of the statutory consultation. The absence of this information represents a significant gap in the consultation process and further supports the view that consultation has been incomplete.

### **Conclusion**

Aston-cum-Aughton Parish Council respectfully requests that Rotherham Metropolitan Borough Council give careful consideration to the matters set out above when forming its view on the adequacy of consultation under Section 42 of the Planning Act 2008.

Taken together, the issues identified including limitations in accessibility and geographic coverage, lack of clarity and completeness of information, uncertainty regarding infrastructure and construction impacts (including traffic and highway impacts), and the volume and complexity of documentation raise significant concerns as to whether affected communities have been provided with a fair, informed and proportionate opportunity to participate in the consultation process.

In particular, the absence of clearly defined construction traffic routes and associated highway impacts represents a material gap in the information presented to consultees, limiting the ability of the Parish Council and residents to fully understand and respond to the proposals.

The Parish Council therefore considers that the consultation has not met the standard required for a development of this scale and complexity and requests that these concerns are fully taken into account when determining whether the consultation process should be regarded as adequate.

We would welcome confirmation of how these matters will be addressed and whether further, more comprehensive consultation will be required prior to submission of any Development Consent Order application.

Yours sincerely,



Clerk to Aston-cum-Aughton Parish Council



24<sup>th</sup> March 2026

Ms Lisa Brooks  
Development Manager – Strategic Applications  
Rotherham Metropolitan Borough Council  
Riverside House  
Main Street  
Rotherham  
S60 1AE

Dear Ms Brooks

Whitestone Solar Farm – Inadequacy of the Consultation Process

Dear Ms Brooks

Bramley Parish Council wishes to make you aware of its concerns and issues about the adequacy of the consultation process undertaken by Whitestone (Green Nation) regarding the proposed Whitestone Solar Farm. The Councillors consider the process to be fundamentally flawed and inadequate, failing to meet the legal requirements for meaningful community engagement as set out under the Planning Act 2008. Their detailed position is as follows:

**1. Systematic Exclusion of Affected Communities**

The consultation systematically excluded the residents most affected by this development:

- **Prohibitive Costs:** The Non-Technical Summary states that hard copies of the full Environmental Statement cost "up to £750", creating an unacceptable financial barrier to accessing essential information.
- **Over-reliance on Digital Platforms:** The process relied heavily on online materials, excluding elderly residents in community.
- **Technical Complexity Barrier:** The Environmental Statement uses impenetrable technical jargon that the Non-Technical Summary fails to adequately translate for ordinary residents. For example, the Non-Technical Summary describes "Moderate to Major Adverse (Significant)" effects in technical language that obscures serious harm and fails to explain in plain English how residents' daily lives will be affected.
- **Local Experience:** In Bramley, many residents are elderly or lack reliable internet access, making it extremely difficult for them to participate meaningfully in a process so heavily dependent on digital communication. These points were brought to the attention of the Parish Council by residents who felt excluded and unable to access key documents or submit their views.

*Bill Chafer Youth & Community Centre, Flash Lane, Bramley, Rotherham, S66 1TS*

*tel: 01709 544590 email: clerk@bramleypc.gov.uk*

## **2. Inadequate Consultation Programme**

Insufficient Public Events: Only seven public events were held for a development affecting multiple communities across nearly 2,000 hectares.

- **Poor Geographic Coverage:** Residents had to travel significant distances.
- **Limited Accessibility:** Events were poorly timed for working families, with insufficient weekend options.
- **Bramley Impact:** The nearest event for many Bramley residents was held several miles away, with no provision for those with limited mobility or without private transport. This further disadvantaged those already struggling to access information.
- **Communications to residents via post in the parish were not consistent,** some received correspondence and details of consultation whilst others did not, parishioners reporting these concerns to Parish Councillors. This demonstrates exclusion of residents and inadequacy of their consultation and engagement, especially given that a number of elderly residents don't have access to electronic communication.
- **Consultation Response Time:** The consultation response time of six weeks during September and October 2025 was of great concern, given the volume and number of documents to consider, read, and process, in addition to the 'Consultation Booklet'. This is particularly pertinent when considering that the first consultation between November 2024 and January 2025 was eleven weeks with less information to read and process. This matter was brought to Whitestone's notice by numerous individuals and recognised organisations, including Ward Councillors and MPs. The Parish Council raised extreme concern that the time to read and process documents for the second consultation was far too short, not allowing for full discussion at meetings and to formulate this written response. As a Parish Council, Councillors requested an extension in a letter to Jonathan Thompson (CEO of Green Nation) earlier in the consultation (which was not responded to), and again in a letter in response to the consultation of 23rd October, specifically requesting that the consultation period be extended until 28th November 2025.

## **3. Failure to Provide Accessible and Complete Information**

- **Non-Technical Summary Inadequacies:** The summary downplays significant impacts, describing "Moderate to Major Adverse (Significant)" effects in technical language that obscures serious harm. It fails to explain in plain English how residents' daily lives will be affected and omits key information about heritage impacts.
- **Technical Document Complexity:** The Environmental Statement chapters are impenetrable to ordinary residents, using expert-level language without adequate explanation. The volume and complexity, hundreds of pages, requires professional

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expertise to understand, and information is scattered across multiple volumes and appendices, making cross-referencing difficult.

- **Limited Information Provided:** The Parish Council did not receive all the documentation with information that needs consideration prior to this response. For example, the 'Draft Environmental Statement' was only available by request at an event, and refers to numerous appendices that have not been circulated by Green Nation. As a statutory consultee, the Parish Council did not receive some necessary documents despite written emailed requests. Most of the meaningful documents required for an informed consultation response were only available online and should have been provided free of charge to all statutory consultees, including this Parish Council. Furthermore, the consultation documents miss several points and there are many inaccuracies in the details and maps.
- **Bramley Experience:** Residents reported that even the so-called Non-Technical Summary was difficult to interpret, and that attempts to seek clarification from the developer were met with generic or unhelpful responses.

#### **4. Dismissal of Community Expertise**

Despite receiving 940 responses in the first consultation:

- **Substantive Concerns Dismissed:** Community objections about fundamental site unsuitability were treated as minor design issues.
- **Cosmetic Changes Only:** Claimed design changes failed to address core problems raised by residents.
- **No Genuine Dialogue:** Technical responses failed to engage with community concerns.

#### **5. Legal Requirements Not Met (Section 47, Planning Act 2008)**

The consultation fails to meet statutory requirements for meaningful community engagement:

- **Accessibility Failure:** Systematic exclusion through digital bias, cost barriers, and technical complexity.
- **Inadequate Opportunity:** Insufficient public meetings and rushed timelines prevent meaningful participation.
- **Information Failure:** Technical documents and incomplete surveys prevent informed community input.
- **Geographic Bias:** Poor coverage of smaller communities most affected by the development.

- Bramley View: The Parish Council believes these failures amount to a breach of both the letter and spirit of the Planning Act, and that the process has not enabled genuine participation by those most affected.

## **6. Procedural Inadequacies**

- Premature Consultation: Consulting on incomplete surveys and outdated heritage assessments.
- Information Barriers: Financial and technical obstacles prevented community access to essential information.
- Timeline Inadequacy: Insufficient time for communities to coordinate responses to complex development.
- Local Impact: The Council notes that several key documents were updated or replaced during the consultation period, causing confusion and making it difficult for residents to know which information was current or relevant.

## **7. Impact on Democratic Decision-Making**

These consultation failures undermine the entire planning process:

- Compromised Community Input: Affected residents could not provide informed responses due to accessibility barriers.
- Flawed Evidence Base: Decision-makers lack comprehensive information needed for balanced evaluation.
- Democratic Deficit: Systematic exclusion of communities violates principles of participatory planning.
- Bramley Perspective: The Parish Council is concerned that the voices of smaller, rural communities have been marginalised, and that the process has failed to uphold the standards of transparency and fairness expected in major infrastructure planning.

## **8. Freepost Address Errors and Reliability of Consultation**

Concerns regarding the Freepost address were raised early in the second consultation period, yet no correction was issued. The address advertised by Whitestone — “Whitestone Solar Farm, Freepost SEC Newgate UK Local”, was confirmed by Royal Mail’s Response Services Team as non-compliant with the Freepost Name licence held by SEC Newgate UK. The correct format should have been “Freepost SEC NEWGATE UK LOCAL”, with the project name placed separately.

Royal Mail confirmed that items addressed using the incorrect format were initially flagged for surcharge or potential return, and delivery depended on manual intervention by Sheffield Mail Centre staff. This process relied on items being posted from the “local catchment”, even though the consultation area extends over 20 km and crosses multiple mail regions and counties. As a

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result, responses from some parts of the area or from national organisations may not have benefited from local intervention, risking lost or delayed submissions.

This administrative error undermines the accessibility and reliability of the statutory consultation process required under Section 42 of the Planning Act 2008 and raises serious doubt as to whether all public feedback has been properly received and recorded. Whitestone's unwillingness to acknowledge or correct the issue, even when alerted by Parish Councils and by Members of Parliament, suggests a dismissive approach to local engagement and procedural accuracy.

### **9. Failure to Extend Consultation Period**

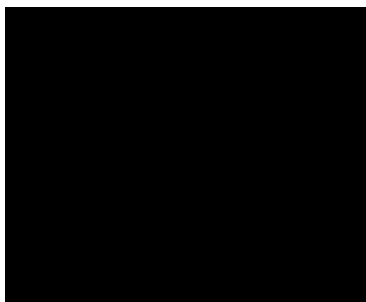
Despite requests from many Parish Council's including Bramley, Whitestone Net Zero Limited declined to extend the consultation period. Given the geographical scale of the proposed development and the number of communities affected, an extension would have been both proportionate and reasonable. The refusal to allow more time has limited the ability of residents and local councils to fully understand and respond to the proposals.

### **Conclusion**

Whitestone's (Green Nation) consultation represents a fundamental failure to engage meaningfully with affected communities as required by law. The systematic exclusion of residents through cost barriers, technical complexity, incomplete information, and rushed timelines violates both the letter and spirit of democratic participation in planning decisions. A development of this scale, affecting multiple historic communities and heritage assets, deserved proper consultation that genuinely includes and engages with those whose lives will be permanently affected.

Bramley Parish Council urges Rotherham Metropolitan Borough Council to take these serious procedural failings into account when providing feedback to the Planning Inspectorate on the adequacy of the consultation, and ask that a request is made to undertake a new, legally compliant consultation process.

Yours Sincerely



Clerk to Bramley Parish Council

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## Harthill with Woodall Parish Council



Village Hall  
Winney Hill  
Harthill  
Sheffield  
S26 7YL

12<sup>th</sup> May 2026

Ms Lisa Brooks  
Development Manager – Strategic Applications  
Rotherham Metropolitan Borough Council  
Riverside House  
Main Street  
Rotherham  
S60 1AE

Dear Ms Brooks,

**Whitestone Solar Farm – Additional comments on the adequacy of the Statutory Consultation Process following the further focused consultation (4<sup>th</sup> March 2026 to 3<sup>rd</sup> April 2026)**

This letter should be read in conjunction with our letter dated 12<sup>th</sup> March 2026

Further to the Parish Council's letter dated 12 March 2026 regarding the adequacy of the statutory consultation process for Whitestone Solar Farm, the Parish Council wishes to submit the following additional observations arising from the subsequent focused consultation exercise undertaken between 4 March and 3 April 2026.

The Parish Council understands that its original adequacy submission is to be appended to RMBC's response to the Planning Inspectorate and respectfully requests that the following further comments are considered alongside that earlier representation.

The Parish Council acknowledges that continued engagement prior to submission of any Development Consent Order application is welcome. However, the focused consultation process and accompanying materials do not, in the Council's view, materially address a number of the concerns previously raised regarding accessibility, proportionality, transparency and the ability of affected communities to participate meaningfully in consultation on evolving proposals.

**Nature and Scope of the Focused Consultation**

The focused consultation leaflet stated that the consultation related to specific updated changes identified for comment and that the Applicant was "not consulting on the project as a

whole at this point.” The leaflet further stated that previous consultation responses had already been considered and that “there is no need to resubmit” earlier comments.

However, the focused consultation changes related to matters with potential wider community implications extending beyond directly affected land interests, including proposed cable route amendments, highway and road safety works, landscaping and mitigation measures, visibility and access works, and potential impacts on hedgerows and landscape features.

In the Parish Council’s view, these matters are not purely technical or administrative amendments but relate to infrastructure and environmental impacts capable of affecting wider communities, including residents who had not previously engaged with the consultation process.

The Parish Council is concerned that the targeted nature of the consultation, when combined with the continuing evolution of the scheme design, may have limited the opportunity for wider affected communities to comment on changes with potential implications for local amenity, movement corridors, landscape character and ecology.

The Parish Council recognises that the Applicant may consider that the focused consultation complied procedurally with statutory consultation requirements. However, the Parish Council respectfully considers that adequacy is not determined solely by whether minimum procedural steps have been followed, but also by whether affected communities were provided with a fair, clear and reasonably accessible opportunity to understand evolving proposals and participate meaningfully in the consultation process.

### **Accessibility of the Focused Consultation**

The Parish Council also wishes to raise further concerns regarding the practical accessibility of the focused consultation exercise.

Unlike the earlier statutory consultation process, the focused consultation relied on a more limited process for obtaining paper response materials, requiring consultees to request forms separately through telephone or email contact.

The consultation materials and the applicant’s website stated that paper feedback forms could be requested via telephone or email. However, the Parish Council became aware of a number of instances where residents experienced difficulty obtaining those materials in practice, including repeated unsuccessful attempts to contact the published telephone number and occasions where forms requested were not subsequently received.

The Parish Council itself sought additional paper response forms in connection with a local meeting intended to assist residents in engaging with the consultation. The Parish Council was informed that the focused consultation was primarily seeking responses from stakeholders who had previously registered an interest or from the Parish Council itself.

Taken together, the targeted nature of the consultation, the reliance on digital engagement, the extended process involved in obtaining paper response materials through telephone or email requests, and the subsequent reliance on postal delivery arrangements for those materials created uncertainty locally regarding whether wider individual representations were genuinely intended to form part of the consultation process and whether the arrangements adopted were intended to encourage wider public participation. This concern was further reinforced by

reports from residents that, even where repeated attempts to contact the consultation line were eventually successful, requested materials were not always subsequently received.

The Parish Council notes that this is of particular relevance in a parish with a significant proportion of elderly residents and others less able or willing to engage digitally.

### **Continuing Evolution of the Scheme**

The Parish Council is also concerned that the focused consultation appeared to identify only selected amendments to the scheme despite additional apparent changes becoming evident through comparison with earlier plans.

As identified within the Parish Council's response to the focused consultation, comparison of the March 2026 plans with earlier consultation material appeared to indicate further alterations to mitigation areas and landscape treatment which were not clearly identified within the numbered consultation changes.

The Parish Council is concerned that this creates a situation where consultees are asked to comment on selected amendments in isolation despite the wider scheme and mitigation strategy continuing to evolve.

Where material elements of the scheme continue to change between consultation stages, the Parish Council considers it important that affected communities are provided with a sufficiently clear and transparent explanation of:

- what has changed;
- why those changes have occurred;
- which matters remain under review; and
- how previous consultation responses have influenced the revised proposals.

Without such clarity, there is a risk that consultees are unable to fully understand the cumulative implications of ongoing amendments to the scheme.

### **Consultation on Incomplete or Evolving Information**

The Parish Council also notes that many of the focused consultation changes continued to be presented at a high level and without sufficient technical detail to enable informed assessment of impacts.

For example, the consultation material frequently referred to:

- cable route amendments;
- road safety works;
- landscaping and mitigation measures;
- changes to the Order limits; and
- works and mitigation proposals which appeared subject to ongoing refinement or further assessment.

In many cases, consultees were not provided with sufficiently detailed information regarding:

- the precise location and alignment of proposed works;
- the extent of hedgerow and potential tree removal or vegetation;
- the scale and nature of highway intervention required;
- construction traffic routes and arrangements;
- visual representations of proposed mitigation; or
- detailed environmental assessment relating to the amended areas.

The Parish Council remains concerned that consultation on proposals which continue to evolve, without sufficient supporting detail, limits the ability of affected communities to provide informed and meaningful comment.

## **Conclusion**

The Parish Council respectfully requests that RMBC take these additional matters into account when considering the adequacy of consultation undertaken in relation to Whitestone Solar Farm.

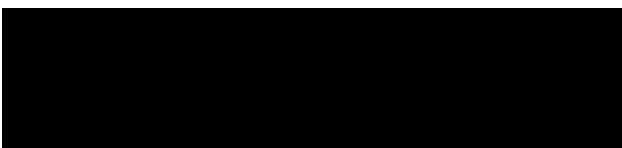
The Parish Council remains concerned that the focused consultation exercise did not materially resolve a number of the concerns previously identified regarding accessibility, transparency, proportionality and meaningful participation.

In some respects, the focused consultation process appears to reinforce earlier concerns regarding:

- reliance on digital engagement;
- practical barriers to participation;
- uncertainty regarding the scope of consultation and who was expected to respond;
- continuing evolution of the scheme during consultation; and
- the difficulty faced by affected communities in understanding and assessing changing proposals.

Taken cumulatively, the Parish Council considers that these matters remain relevant to any assessment of whether affected communities have been provided with a fair, proportionate and reasonably accessible opportunity to participate effectively in the pre-application consultation process.

Yours sincerely,



Clerk and Responsible Financial Officer  
Harthill with Woodall Parish Council

## **Appendix A – Specific Record of Attempts to Obtain Consultation Materials**

The following record was maintained by the Chair of Harthill with Woodall Parish Council following complaints received from residents regarding difficulties obtaining paper consultation materials during the focused consultation process.

| <b>Date</b>                        | <b>Action / Outcome</b>                                                                                                                     |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| 20 March 2026                      | Three telephone calls made to the consultation contact number. No answer received.                                                          |
| 23 March 2026                      | Two further telephone calls made. Calls disconnected after approximately 45 seconds.                                                        |
| 24 March 2026                      | Contact successfully made with a representative. Name, address and area of interest provided for paper consultation materials to be issued. |
| Up to close of consultation period | Requested consultation materials were not received.                                                                                         |



Whitestone Solar Farm Consultation  
c/o SEC Newgate UK  
14 Greville Street  
London  
EC1N 8SB

# Share your feedback

## Targeted consultation

4 March – 3 April 2026



**WHITESTONE**  
solar farm

**We are currently conducting an additional round of consultation on proposed changes to the boundary of Whitestone Solar Farm, and we want to hear from you.**

This questionnaire is designed to be used alongside the consultation leaflet which describes each change and is available on our website ([whitestonesolarfarm.co.uk](http://whitestonesolarfarm.co.uk)) or in printed copy by request.

All responses must be received by **11:59pm on 3 April 2026**. You can submit your feedback through the following methods:

- In the pre-paid envelope sent to your property
- Complete this questionnaire online at [whitestonesolarfarm.co.uk](http://whitestonesolarfarm.co.uk) or,
- Email your feedback to [info@whitestonesolarfarm.co.uk](mailto:info@whitestonesolarfarm.co.uk)

To ensure your feedback on these proposed changes is considered in this consultation, please include your name and the number of the change(s) you are providing feedback on. Any feedback on the project as a whole will not be considered in this consultation.

After this consultation, we will consider all the feedback that we have received, which will help inform the final proposals we submit in our application for development consent.

By submitting your feedback, you agree to our terms and conditions and that you have read our Privacy Notice available at our website [whitestonesolarfarm.co.uk](http://whitestonesolarfarm.co.uk). All personal information will be stored in compliance with the General Data Protection Regulation (GDPR).

## About you

Name:

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Address:

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Postcode:

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Email:

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## Feedback

Q1. Which change(s) are you providing feedback on? You can select more than one change.  
Select from the following:

- ☐ Change 1: Cable Route
- ☐ Change 2: Landscaping
- ☐ Change 3: Road Safety
- ☐ Change 4: Road Safety
- ☐ Change 5a: Road Safety
- ☐ Change 5b: Cable Route
- ☐ Change 6: Cable Route and Road Safety
- ☐ Change 7: Road Safety
- ☐ Change 8: Road Safety
- ☐ Change 9: Cable Route
- ☐ Change 10: Cable Route
- ☐ Change 11: Road Safety
- ☐ Change 12: Road Safety

- ☐ Change 13a: Cable Route
- ☐ Change 13b: Road Safety
- ☐ Change 13c: Landscaping
- ☐ Change 14a: Drainage
- ☐ Change 14b: Road Safety
- ☐ Change 14c: Cable Route
- ☐ Change 15: Road Safety
- ☐ Change 16: Road Safety
- ☐ Change 17: Road Safety
- ☐ Change 18: Road Safety
- ☐ Change 19a: Cable Route
- ☐ Change 19b: Road Safety
- ☐ Change 20: Road Safety

- ☐ Change 21: Road Safety
- ☐ Change 22: Road Safety
- ☐ Change 23: Road Safety
- ☐ Change 24: Road Safety
- ☐ Change 25: Road Safety
- ☐ Change 26: Road Safety
- ☐ Change 27: Road Safety
- ☐ Change 28: Landscaping
- ☐ Change 29: Cable Route and Road Safety
- ☐ Change 30: Road Safety
- ☐ Change 31: Road Safety

Q2. Please provide your feedback on our proposed change(s) you have ticked above. Please reference the change number(s) you are referring to in your response.

## Get in touch

If you would like more information contact us via:



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## Harthill with Woodall Parish Council



Village Hall  
Winney Hill  
Harthill  
Sheffield  
S26 7YL

12<sup>th</sup> March 2026

Ms Lisa Brooks  
Development Manager – Strategic Applications  
Rotherham Metropolitan Borough Council  
Riverside House  
Main Street  
Rotherham  
S60 1AE

Dear Ms Brooks,

### **Whitestone Solar Farm – Adequacy of the Statutory Consultation Process**

Harthill with Woodall Parish Council asks that Rotherham Metropolitan Borough Council take the following observations into account when forming its view on the adequacy of Whitestone Solar Farm's pre-application consultation under Section 42 of the Planning Act 2008.

In considering adequacy, the key question is not whether consultation was undertaken in a purely procedural sense, but whether affected communities were provided with a fair and reasonable opportunity to understand the proposals and provide informed comment. The observations below are intended to assist RMBC in considering whether that standard has been met in practice.

The statutory consultation stage is an important part of the Nationally Significant Infrastructure Project (NSIP) process and is intended to ensure that:

- Local authorities, statutory consultees and affected communities are given a genuine opportunity to understand and comment on proposals.
- Consultation materials are clear and sufficiently detailed to allow meaningful engagement.
- The process is accessible and reliable for all consultees; and
- Issues raised during consultation can be considered before submission of any Development Consent Order (DCO) application.

For a project of this scale — approximately 750MW across three counties and numerous parishes — the Parish Council considers that a particularly high standard of clarity, consistency and accessibility in consultation would reasonably be expected. The scale and geographic

spread of Whitestone Solar Farm place a significant responsibility on the promoter to ensure that consultation is comprehensive, inclusive and technically accurate.

The Parish Council's concerns do not relate to the merits of renewable energy in principle. Rather, they relate to whether the consultation undertaken has provided affected communities with a clear, accessible and reliable opportunity to understand the proposals and provide informed comment.

The observations set out below relate to several aspects of the consultation process, including:

- Reliability and accessibility of consultation responses (Freepost address uncertainty);
- Limited geographic engagement and accessibility of consultation events;
- Inconsistency and lack of clarity in information presented to consultees;
- Insufficient certainty regarding access routes, infrastructure and future land requirements;
- The volume, structure and proportionality of documentation issued within the consultation window; and
- The accuracy and completeness of baseline and receptor information within the consultation materials.

Each of these matters is discussed in turn below. While some issues may appear administrative when viewed individually, taken together they raise broader questions regarding the overall adequacy and robustness of the consultation process.

### **1. Adequacy of Consultation – Freepost Address Reliability**

During the consultation period the Parish Council sought clarification regarding the Freepost address provided for postal responses. The issue arose when the Council attempted to arrange printing of Freepost envelopes to assist residents in submitting consultation responses and the printing provider queried the address format.

Subsequent correspondence with Royal Mail indicated that the licensed Freepost NAME format differed from the address presented in the consultation materials. Royal Mail advised that many items might still be delivered but also explained that outcomes could vary depending on how individual mail centres processed the items. In some cases, items might be recognised and forwarded to the Freepost account, while in others they could require manual handling or potentially be treated as incomplete addresses.

The Parish Council raised this concern with the promoter during the consultation period and requested clarification and correction of the address format. The consultation materials were not amended, and the consultation deadline was not extended following this correspondence.

The Parish Council therefore considers that the address format used in the consultation materials did not fully reflect the licensed Freepost format for the service being used. While Royal Mail indicated that many items might still be delivered, the use of a non-standard format introduced an unnecessary margin for error and increased reliance on manual handling within the postal system. In the Council's view, this created avoidable uncertainty in what should otherwise have been a straightforward and reliable method for submitting consultation responses.

## **2. Limited Engagement and Accessibility of Consultation**

Whitestone’s Consultation Booklet sets out a number of design principles, including commitments to “engage with stakeholders to develop the design” and to “find out what is important to people about the local area and seek to incorporate feedback” (Whitestone 3 Consultation Booklet p.8–9). The booklet also confirms that this stage constitutes statutory consultation under the Planning Act 2008.

For a development of this scale, Harthill with Woodall Parish Council is concerned that the consultation delivery does not reflect the scale and complexity of the proposal.

### **2.1 Geographic Distribution of Public Events**

During the statutory consultation period, seven public information events were planned and held across a development corridor exceeding 20 kilometres in length. Only one event was held in Harthill. No dedicated event was held in Kiveton, despite parts of the settlement falling within or immediately adjacent to the defined WS3 inner consultation zone and its substantially larger population compared to Harthill. Given its immediate proximity to Whitestone 3, residents there are likely to experience direct landscape, visual and construction traffic impacts arising from the proposed development.

While consultation events were held in smaller neighbouring villages, no event was provided in Kiveton Park itself, despite it being one of the largest communities directly adjacent to the proposed development.

The limited geographic spread of events does not appear proportionate to the number of settlements materially affected. The consultation materials do not explain the rationale used to determine event locations or how decisions were made regarding which communities warranted direct engagement events, making it difficult to understand how equitable access to engagement opportunities was ensured.

### **2.2 Notification Methodology and Consultation “Zones”**

The consultation booklet does not explain the methodology used to determine which households received direct notification of the consultation. From the information provided, the notification approach appears to have been primarily proximity-led rather than based on the likely extent of impacts.

While distance from panel arrays may have informed mailing zones, the impacts of a project of this scale extend beyond immediate site boundaries and include:

- Construction traffic corridors and haul routes
- Elevated viewpoints overlooking the valley
- Cable route options and crossing points
- Noise and operational infrastructure
- Cumulative landscape and visual effects

The consultation materials do not explain how these broader impact pathways were taken into account when defining the consultation notification area.

As a result, residents located outside narrowly defined proximity zones — but materially affected by traffic, visual or infrastructure impacts — may not have received direct notification. This raises concerns as to whether consultation was sufficiently inclusive of all affected communities.

The Statement of Community Consultation (SoCC) confirms that the inner consultation zone was defined by drawing a boundary approximately 1 km from the site, expanded to include whole villages. However, the consultation materials do not clearly explain how this “whole village” approach was applied in practice or which settlements were ultimately included within the direct notification area. Nor do they explain how the consultation boundary accounted for potential construction traffic routes or other impact corridors extending beyond the immediate site boundary.

While a 1 km proximity band may be administratively convenient, its appropriateness must be considered in the context of the scale of the proposal. Whitestone Solar Farm is not a compact single-site development but a 750 MW scheme extending across approximately 20 kilometres. Landscape, visual, traffic and cumulative impacts are therefore likely to extend well beyond a 1 km radius. In this context, a fixed 1 km inner consultation zone appears narrow and insufficiently reflective of the project’s geographic and functional reach.

The Parish Council also notes that a number of residents attending the Harthill public event indicated that they had only recently become aware of the proposal. Following the event, the Parish Council hosted an additional information session at the Village Hall, where residents sought clarification on how to submit feedback and expressed concern that key aspects of the scheme remained unclear. While anecdotal, this suggests that awareness and understanding of the consultation may not have been as widespread as intended.

Taken together, these issues suggest that the consultation notification methodology may not have fully reflected the geographic extent of communities likely to experience impacts from the proposal. They also highlight the importance of direct notification for affected households, as reliance on general publicity, social media or local press coverage cannot reasonably be assumed to reach all potentially affected residents.

### **2.3 Event Timing and Accessibility**

Event timing was limited primarily to weekday daytime and early evening hours. Only one Saturday event was provided, and no events extended beyond 7pm. No structured presentations or formal question-and-answer sessions were delivered.

For a Nationally Significant Infrastructure Project of this scale, the consultation materials do not set out any assessment of potential accessibility barriers, including provision for residents without digital access or those unable to attend events during working hours.

The Statement of Community Consultation (SoCC) also does not indicate whether any assessment was undertaken regarding the proportionality of seven events across a development corridor exceeding 20 kilometres, or whether event provision was benchmarked against the scale of the proposal.

The Harthill event was held in a village hall with a capacity of approximately 100 people and operated as a four-hour drop-in session. While drop-in formats do not require all attendees to be present simultaneously, the potentially affected population across Harthill, Woodall,

adjacent parts of Kiveton, and nearby cross-boundary settlements significantly exceeds the capacity of the venue.

The combination of limited venue capacity and a short event duration raises questions as to whether the consultation infrastructure provided sufficient opportunity for meaningful engagement for all potentially affected residents. The SoCC does not indicate whether venue size, anticipated attendance, or geographic catchment were assessed when determining appropriate locations and facilities for consultation events.

## **2.4 Conclusion on Accessibility**

Taken together, the limited geographic distribution of consultation events, the lack of clarity regarding notification methodology, and the constraints on event timing and venue capacity indicate a consultation approach that appears limited relative to the geographic extent of communities potentially affected.

The Parish Council respectfully considers that, for a proposal of this scale and complexity, a broader and more clearly explained approach to community engagement would reasonably have been expected in order to ensure accessible and meaningful participation for all affected communities.

In combination, these factors raise questions as to whether the consultation approach adopted was proportionate to the geographic scale and potential impact of the proposed development.

## **3. Clarity of Information and Community Confidence**

Beyond issues of geographic accessibility, the Parish Council is concerned about inconsistency and lack of clarity in the information presented during consultation.

### **3.1 Statements Regarding Finality of the Layout**

At public events, members of the project team indicated that the current layout represented the “final” boundary for Whitestone 3. However, during the same consultation period residents observed landowner enquiries and notices placed in fields outside the published red-line boundary seeking ownership information.

This apparent inconsistency created uncertainty as to whether the published boundary represents a fixed proposal or remains subject to change. The Consultation Booklet does not explain whether discussions to secure additional land are ongoing or how such discussions relate to the published project boundary (“Order Limits”).

While the SoCC confirms that the design process is iterative and subject to refinement, this iterative nature was not consistently communicated at public events, where the project boundary was described as “final”. The presence of land ownership enquiries beyond the mapped boundary during the consultation period has therefore contributed to a perception within the community that additional land may still be under consideration.

For affected communities, clarity regarding the extent of the proposed development is fundamental to meaningful consultation.

### **3.2 Landowner Engagement and Perceived Pressure**

The Parish Council has been informed by several landowners that approaches relating to cabling routes and land access have included references to potential compulsory acquisition powers. While compulsory acquisition is a lawful mechanism within the NSIP regime, discussion of such powers during pre-application consultation may reasonably be perceived as creating pressure if not carefully contextualised.

It is not the Council's role to adjudicate on individual interactions. However, the consistency of these reports has contributed to a perception within the community that consultation is occurring in parallel with efforts to secure land agreements.

Such perceptions, whether intended or not, have the potential to undermine confidence in the good-faith nature of the consultation process.

### **3.3 Accessibility of Information**

Attendees at public events reported that a number of questions were answered with references to matters "still to be decided". While iterative design is expected in NSIP projects, meaningful consultation requires sufficient clarity for consultees to understand what is proposed and what remains flexible.

In addition, the Parish Council notes that:

- Printed copies of the full Draft Environmental Statement and supporting documents were not proactively distributed.
- The consultation relied heavily on online access to technical documents.
- No clear explanation was provided as to how residents without reliable internet access or those with accessibility needs could review the full documentation.

These factors suggest that greater provision for non-digital engagement would reasonably have been expected.

At the Harthill consultation event, copies of technical documents were present but held in multiple lever-arch files at the rear of the hall. Attendees were not actively directed to these materials, and their format made meaningful review during the event impractical.

The SoCC further states that hard copies of the Draft Environmental Statement may be subject to a charge of up to £750 to cover printing costs. While cost recovery may be lawful, such a charge represents a significant practical barrier for residents wishing to review the full documentation in printed form. Reliance on online access combined with high-cost printed copies raises questions as to whether the consultation materials were fully accessible in practice.

### **3.4 Impact on Community Confidence**

Taken together, these issues have created uncertainty and reduced confidence locally in the consultation process.

Where clarity and consistency in consultation information are perceived to be lacking, this can affect the ability of residents to participate in the process with confidence and fully understand the proposals on which they are being asked to comment.

### **3.5 Transparency of the Promoter's Corporate Identity**

Consultation materials refer to “Whitestone Solar Farm” and “Whitestone Net Zero Limited”, but the Statement of Community Consultation and Consultation Booklet do not prominently display the promoter's registered company number, registered office address or place of registration. While such information is publicly available via Companies House, it would reasonably be expected that the legally accountable entity is clearly identified within consultation documentation for a project of this scale. Clear corporate identification supports transparency and public confidence, particularly where long-term land use change and potential compulsory acquisition powers are proposed.

### **4. Insufficient Clarity Regarding Access Routes, Infrastructure and Future Land Requirements**

While Section 3 addresses the clarity of information presented during consultation, the Parish Council is also concerned about the completeness of the technical information made available to consultees.

The Parish Council notes that several core infrastructure elements were described as provisional, indicative, or subject to ongoing refinement. While some degree of evolution is expected within Nationally Significant Infrastructure Project (NSIP) processes, consultation requires sufficient certainty for affected communities to understand the likely extent and nature of impacts.

At the time of consultation, a number of key elements of the scheme remained unclear or incomplete. In particular:

- Key construction access routes and haul corridors were not definitively identified, with several maps indicating that routes remained under consideration and representatives at consultation events indicating that routes were still under review.
- Cable corridors and associated infrastructure were presented with multiple potential alignments and options, without clarity as to final routing or land requirements.
- Buffer distances between panel arrays, Public Rights of Way and residential properties were described inconsistently within consultation documentation and at public events.
- Ecological surveys were stated to be ongoing, with further bat, bird and habitat assessments expected to be completed after the consultation period.
- The Draft Environmental Statement and associated figures present information for Whitestone 1, 2 and 3 within shared documents and appendices, requiring consultees to navigate across multiple volumes and figures to identify impacts relevant to their local area.

The absence of confirmed access routes, defined cable alignments, completed survey baselines and clearly separated site-specific information limited the ability of consultees to assess potential impacts in a meaningful and informed way. Consultation on evolving or incomplete information reduces the practical value of the opportunity to comment and raises questions as to whether the pre-application engagement provided consultees with sufficient clarity to respond effectively.

### **5. Volume and Complexity of Documentation**

The statutory consultation was accompanied by a full Draft Environmental Statement and numerous supporting technical appendices covering landscape, transport, ecology, cultural heritage, noise, glint and glare, flood risk and other specialist disciplines. Collectively, these

documents represent a substantial volume of technical material for consultees to review within the consultation period.

While documentation was labelled to distinguish Whitestone 1, 2 and 3, understanding impacts specific to any one locality nevertheless required consultees to review multiple topic chapters, figures and appendices across the Draft Environmental Statement. Even where W1, W2 and W3 were separated, identifying parish-level effects involved extensive cross-referencing between chapters and technical drawings rather than reliance on clear, locally focused summaries. The practical task of extracting site-specific implications from the documentation was therefore complex and time-consuming.

Whitestone Solar Farm is a 750MW scheme extending across approximately 20 kilometres and three counties. This is around fifteen times the statutory 50MW threshold for a Nationally Significant Infrastructure Project. Although the consultation period exceeded the statutory minimum of 28 days, proportionality remains a relevant consideration when assessing adequacy. A project of this magnitude required affected communities to review and interpret extensive technical documentation within a six-week consultation window, during which public events and presentations occurred part-way through the period.

The statutory consultation period ran from 16 September to 28 October 2025. Public consultation events were held between 2 October and 15 October, with the final event taking place on 15 October at Whiston Village Hall, only 13 days before the consultation closed. For many residents these events represented their first opportunity to view plans and ask questions about the proposals. Those attending the later sessions therefore had a limited period remaining in which to review the consultation documentation and prepare responses before the closing date. The Parish Council understands that several parish councils requested a short extension to the consultation period to allow communities additional time to consider the information presented at these events. The consultation period was not extended.

For small parish councils operating with limited administrative capacity, including part-time clerks and volunteer councillors, this level of documentation represents a significant practical burden. Adequate consultation under the Planning Act 2008 requires not merely the availability of information, but that information be presented in a manner that allows meaningful understanding and informed response. Where the scale and structure of documentation make it difficult for consultees to identify and assess impacts specific to their area within the consultation period, questions of adequacy legitimately arise.

In the context of the project's scale and geographic reach, it would have been reasonable to expect consultation materials structured in a way that facilitated straightforward parish-level scrutiny without extensive cross-referencing across technical disciplines. The cumulative volume and complexity of documentation, when considered alongside the limited number of engagement events and reliance on digital access, appear disproportionate to the consultation infrastructure provided.

## **6. Accuracy and Completeness of Consultation Information**

The Parish Council is concerned that certain elements of the Draft Environmental Statement and associated consultation materials contain omissions or inaccuracies which materially affect the ability of consultees to understand likely impacts.



For example, the documentation does not clearly acknowledge an existing housing development, off Hard Lane, immediately adjacent to the proposed Whitestone 3 site. Given its proximity, such development is clearly relevant to the assessment of visual impact, traffic, residential amenity and cumulative effects. The absence or insufficient treatment of this receptor within consultation materials may reduce the reliability of the baseline against which impacts are assessed.

The Parish Council also notes that the consultation booklet includes illustrative diagrams of landscape mitigation and screening, including examples where solar panels are shown behind hedgerows or tree planting intended to reduce visual impact. These illustrations appear to represent idealised scenarios in which vegetation lies directly between residential properties and solar arrays. The Consultation Booklet states that solar panels are being assessed up to a maximum height of approximately 3.8 metres, yet this scale is not readily apparent from the visual illustrations presented.

In the case of Whitestone 3, however, parts of Harthill and Woodall are situated on elevated terrain overlooking sections of the proposed development area. In such circumstances, mitigation planting located within lower-lying fields is unlikely to materially screen views of solar arrays from higher residential properties. The consultation materials do not clearly explain how the proposed mitigation measures would function where residential receptors are positioned above the development site. This has contributed to concern within the community that the visual examples presented may not accurately reflect the likely experience of residents in elevated parts of the village.

The masterplan diagrams also depict proposed solar areas using uniform green shading similar to surrounding agricultural land. While this may reflect the existing land use, the presentation makes it difficult to distinguish between fields that would remain unchanged and those that would contain solar infrastructure. A clearer visual distinction within the diagrams may have assisted consultees in understanding the extent and visual presence of the proposed solar arrays within the landscape.

Meaningful consultation requires that information presented to consultees is sufficiently accurate and complete to enable informed comment. Where material receptors or developments are omitted or inadequately described, consultees may be placed at a disadvantage when attempting to evaluate potential effects.

These concerns are not raised in isolation. When considered alongside the infrastructure uncertainties described in Section 4 and the documentation complexity outlined in Section 5, such omissions reinforce the Parish Council's submission that the consultation materials did not always provide the clarity and completeness necessary to support fully informed engagement.

## **Conclusion**

The Parish Council respectfully requests that Rotherham Metropolitan Borough Council give careful consideration to the matters set out above when forming its view on the adequacy of consultation under Section 42 of the Planning Act 2008.

Taken individually, some of the issues identified may appear administrative in nature. However, when considered cumulatively — including questions regarding consultation accessibility, geographic coverage of engagement events, clarity of infrastructure information,

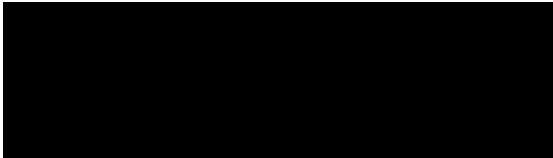
documentation complexity, and baseline omissions — they raise legitimate questions as to whether affected communities were provided with a fully informed and proportionate opportunity to participate in the statutory consultation process.

The Parish Council therefore asks that these matters be taken into account when determining whether the standards for adequate consultation have been met.

The Parish Council also notes that a further “targeted consultation” leaflet has recently been circulated electronically to parish councils and individuals who had previously registered interest in the project. The leaflet does not appear to advertise additional public events and appears primarily to rely on digital distribution. While any further engagement is welcome, such targeted communication does not address the Parish Council’s concerns regarding the accessibility and geographic reach of the original statutory consultation.

The recent communications issued in March 2026 indicate that aspects of the scheme design and layout continue to evolve prior to submission of the Development Consent Order application. While iterative design is expected in large infrastructure projects, these ongoing revisions further illustrate the challenges faced by consultees when attempting to comment on proposals that were still developing during the statutory consultation period.

Yours Sincerely,

A large black rectangular box redacting the signature of the Clerk and Responsible Financial Officer.

Clerk and Responsible Financial Officer  
Harthill with Woodall Parish Council

## HELLABY PARISH COUNCIL

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Bateman Road  
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S66 8AH

**Clerk & Finance Officer**  
[REDACTED]

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20 May 2026

To: Ms Lisa Brooks  
Development Manager – Strategic Applications  
Rotherham Metropolitan Borough Council  
Riverside House  
Main Street  
Rotherham  
S60 1AE

Dear Ms Brooks,

### **Whitestone Solar Farm – Adequacy of the Statutory Consultation Process in Relation to Hellaby and Surrounding Communities**

This letter is submitted in relation to the Whitestone Solar Farm proposals and the adequacy of the statutory consultation undertaken under Section 42 of the Planning Act 2008.

While recognising the importance of renewable energy and the role it plays in supporting national climate objectives, significant concerns remain regarding whether the consultation process has provided communities within Hellaby and the wider Rotherham area with a fair, meaningful and proportionate opportunity to understand the proposals and respond in an informed manner.

The concerns set out below draw upon issues raised across a number of parish councils and local residents affected by the proposals, together with specific concerns relevant to Hellaby and its surrounding transport corridors.

#### **1. Accessibility and Effectiveness of Consultation**

There are serious concerns that the consultation process has not been sufficiently accessible or effective for many affected communities.

The consultation relied heavily on leaflet distribution, online materials and digital access to extensive technical documentation. Many residents reportedly mistook consultation leaflets for commercial advertising material relating to domestic solar installations and discarded them without recognising their significance.

For a Nationally Significant Infrastructure Project of this scale, the consultation infrastructure appears limited and disproportionate to the geographic extent of the proposals and the number of communities potentially affected.

Only a small number of public engagement events were held across a development corridor extending across multiple parishes and local authority areas. Several communities likely to experience indirect impacts, including traffic, landscape and infrastructure effects, were not provided with dedicated consultation events.

Event timing also restricted participation:

Only limited evening and weekend availability was provided  
No formal presentations or structured question-and-answer sessions were delivered  
Some events were held in venues with limited capacity  
The final events took place close to the consultation deadline, leaving insufficient time for residents and parish councils to review complex documentation and formulate responses

This raises legitimate concerns as to whether affected communities were provided with a genuinely accessible opportunity to participate in the consultation process.

## 2. Inadequate Geographic Scope of Consultation

The consultation methodology appears to have relied heavily on proximity-based consultation “zones”, rather than a realistic assessment of the wider impacts arising from a project of this scale.

A fixed distance-based approach does not adequately account for:

- Construction traffic corridors
- Access and haulage routes
- Landscape and visual impacts
- Cumulative environmental effects
- Infrastructure connections and cable corridors
- Operational impacts extending beyond immediate site boundaries

This is particularly important for Hellaby, which is already heavily impacted by motorway traffic, industrial development and transport-related environmental pressures associated with the M18 Junction 1 corridor.

Although Hellaby may not sit immediately adjacent to all proposed solar array areas, the community is likely to experience significant indirect impacts through construction traffic movements and cumulative environmental effects.

Residents and local councils therefore remain concerned that communities materially affected by the proposals may not have been fully identified or adequately engaged during the statutory consultation process.

## 3. Lack of Clarity and Completeness of Information

A recurring concern throughout the consultation process has been the lack of clarity and consistency in the information presented to consultees.

Key infrastructure components remained unclear or subject to ongoing revision during consultation, including:

- Construction access routes
- Cable corridors
- Substation locations
- Battery storage infrastructure
- Haulage routes
- Traffic management arrangements
- Associated construction compounds

Representatives at consultation events frequently indicated that significant aspects of the proposals remained “under consideration” or “still to be decided”.

While some degree of design evolution is expected in NSIP projects, meaningful consultation requires consultees to understand with reasonable certainty what is actually being proposed.

Without confirmed infrastructure layouts and route-specific information, communities such as Hellaby are unable to properly assess likely impacts on:

- Residential amenity
- Traffic congestion
- Road safety
- Air quality
- Noise exposure
- Ecology and landscape

The extensive reliance on online technical documentation also created significant barriers for many residents attempting to engage meaningfully with the process.

The volume and complexity of the consultation material placed an unreasonable burden on parish councils and residents, particularly given the limited consultation window.

#### 4. Construction Traffic and Hellaby Highway Impacts

One of the most significant concerns for Hellaby residents relates to construction traffic impacts and the absence of clear route-specific information.

At the time of consultation, definitive construction haul routes and access strategies had not been clearly identified. Multiple routes remained under consideration, preventing residents and consultees from understanding the likely extent of impacts on local communities.

However, it is evident that a development of this scale will generate substantial HGV movements associated with:

- Solar panels and mounting systems
- Aggregate and construction materials
- Heavy plant and abnormal loads
- Cabling and substation equipment
- Construction workforce movements

Hellaby is already heavily affected by traffic congestion associated with:

- M18 Junction 1
- A631 Bawtry Road
- Denby Way
- Cumwell Lane
- Kingsforth Lane
- Existing industrial and logistics developments

Additional construction traffic associated with Whitestone would add further pressure to a corridor already experiencing:

- Daily congestion
- Elevated air pollution levels
- High transportation noise exposure
- Road safety concerns
- Significant HGV activity

There remains insufficient clarity regarding:

- Which roads would be used for construction access
- Frequency and duration of HGV movements
- Timing of vehicle movements
- Mitigation measures and enforcement mechanisms
- Potential cumulative impacts alongside other major developments

This lack of route-specific information significantly limits the ability of affected communities to provide informed comment.

## 5. Cumulative Impacts on Hellaby and Surrounding Areas

A major concern is the apparent failure to adequately assess cumulative impacts on Hellaby and neighbouring communities.

Hellaby is already subject to substantial cumulative environmental pressures arising from:

- Existing motorway infrastructure
- Logistics and industrial developments
- Ongoing and committed housing developments
- Freight and distribution sites
- Heavy vehicle movements associated with nearby industrial estates

The area surrounding M18 Junction 1 has experienced extensive industrial and logistics expansion over recent years, resulting in increased traffic volumes and associated environmental pressures.

The cumulative effect of additional construction traffic associated with Whitestone has not been properly assessed alongside:

- Existing committed developments
- Potential overlapping construction phases
- Existing transport congestion
- Existing air quality conditions
- Existing transportation noise exposure

This omission is particularly concerning given Hellaby's location adjacent to one of the borough's busiest transport corridors.

## 6. Air Quality and Public Health Concerns

Hellaby already experiences elevated levels of transport-related air pollution associated with the M18 corridor and surrounding industrial development.

Residents remain concerned that the consultation materials underestimate or fail to properly assess the cumulative health impacts of additional construction traffic and associated emissions.

Current concerns include:

- Elevated nitrogen dioxide levels
- Particulate matter exposure (PM2.5 and PM10)
- Existing traffic congestion
- Lack of comprehensive roadside monitoring
- Prolonged exposure for residents living close to key transport corridors

The consultation materials appear to dismiss the need for a full air quality assessment on the basis that construction impacts would be "temporary" or "short-term".

However, growing medical evidence demonstrates that even relatively short-term exposure to elevated pollution levels can have significant impacts on human health.

This is particularly important for communities such as Hellaby where residents are already exposed to prolonged periods of transport-related pollution and environmental noise.

The cumulative effects of additional construction activity therefore require far more robust assessment than has currently been provided.

## 7. Transportation Noise and Residential Amenity

Hellaby residents have longstanding concerns regarding high levels of transportation noise associated with:

- The M18 motorway corridor
- Heavy freight traffic
- Industrial developments
- Congestion along Bawtry Road and associated routes

The proposed development risks increasing these impacts during the construction phase through:

- Additional HGV movements
- Extended construction working hours
- Construction compounds and associated activity
- Increased traffic congestion and stop-start vehicle movements

Residents already experience substantial periods of road traffic noise affecting homes, gardens and wider residential amenity.

The consultation process did not provide sufficient information regarding:

- Predicted construction noise impacts
- Route-specific transportation noise assessments
- Mitigation measures
- Cumulative noise effects alongside existing developments

The absence of clear and detailed information on these matters further undermines the adequacy of the consultation process.

## 8. Adequacy of Community Engagement

Reports from public engagement events indicate that consultation representatives were frequently unable to provide clear answers to local concerns.

Communities sought clarification on issues including:

- Construction traffic
- Flooding
- Biodiversity impacts
- Highway safety
- Landscape impacts
- Community benefit
- Long-term land use change

In many cases, responses were vague or indicated that matters remained unresolved.

There is also concern that engagement appeared focused on meeting statutory requirements procedurally, rather than genuinely assisting communities in understanding the proposals and participating meaningfully in the process.

Where communities perceive consultation to be incomplete, inconsistent or unclear, confidence in the overall process is significantly undermined.

## 9. Overall Adequacy of the Consultation Process

Taken together, the issues identified above raise significant concerns as to whether the consultation process has met the standards required under the Planning Act 2008.

The concerns are not limited to isolated administrative matters. Rather, they collectively suggest a consultation process that has not provided communities such as Hellaby with:

- Clear and reliable information
- Sufficiently accessible engagement opportunities
- Adequate route-specific transport information
- Meaningful opportunity to assess likely impacts
- Sufficient time and clarity to respond effectively

In particular, the absence of confirmed construction traffic routes and cumulative environmental assessment represents a material gap in the information available to consultees.

For communities already experiencing substantial transport-related environmental pressures, these omissions are especially significant.

## Conclusion

It is respectfully requested that Rotherham Metropolitan Borough Council carefully considers the concerns outlined above when determining whether the statutory consultation undertaken for Whitestone Solar Farm should be regarded as adequate under Section 42 of the Planning Act 2008.

In relation to Hellaby and surrounding communities, there remain serious concerns regarding:

- The accessibility and proportionality of the consultation process
- The adequacy of geographic engagement
- The lack of clarity regarding infrastructure and construction routes
- The cumulative impact of construction traffic and environmental effects
- The absence of detailed route-specific transport, air quality and noise assessments
- The ability of residents and parish councils to provide informed comment

The consultation process does not appear to have provided affected communities with a sufficiently clear, comprehensive or proportionate opportunity to understand the proposals and participate meaningfully in the process.

It is therefore requested that these concerns are fully taken into account when assessing the adequacy of consultation and determining whether further consultation and clarification should be required prior to submission of any Development Consent Order application.

Yours sincerely,



Clerk & RFO Hellaby Parish Council



**FORMAL SUBMISSION****ADEQUACY OF CONSULTATION**

*Report by Hooton Roberts and Firsby Parish Meeting to Rotherham Metropolitan Borough Council*

|                     |                                                                                                                                                                                                                                                                |
|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>PROJECT</b>      | Whitestone Solar Farm NSIP (EN0110020)                                                                                                                                                                                                                         |
| <b>APPLICANT</b>    | Whitestone Net Zero Ltd (Green Nation)                                                                                                                                                                                                                         |
| <b>SUBMITTED BY</b> | Hooton Roberts and Firsby Parish Meeting                                                                                                                                                                                                                       |
| <b>SUBMITTED TO</b> | Rotherham Metropolitan Borough Council                                                                                                                                                                                                                         |
| <b>DATE</b>         | May 2026                                                                                                                                                                                                                                                       |
| <b>PURPOSE</b>      | To inform Rotherham MBC's Adequacy of Consultation Representation to the Planning Inspectorate at acceptance stage, and to be appended to that Representation as the Parish Meeting's evidence on the adequacy of the Applicant's pre-application consultation |

*This Report is submitted by Hooton Roberts and Firsby Parish Meeting, a civil parish authority and a statutory consultee in respect of the Whitestone Solar Farm Nationally Significant Infrastructure Project. It is provided to Rotherham Metropolitan Borough Council to assist the Council in the preparation of its Adequacy of Consultation Representation to the Planning Inspectorate. The Parish Meeting respectfully requests that the Council have regard to the analysis set out in this Report, draw upon it as the Council considers appropriate, and append the Report in full to the Council's Representation.*

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## A. Purpose and standing of this submission

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1. This Report is submitted by Hooton Roberts and Firsby Parish Meeting (“the Parish Meeting”) to Rotherham Metropolitan Borough Council (“the Council”) in connection with the proposed application for a Development Consent Order in respect of the Whitestone Solar Farm Nationally Significant Infrastructure Project (PINS reference **EN0110020**), promoted by Whitestone Net Zero Ltd (“the Applicant”). The Applicant’s stated programme is for submission of the application in late May 2026.
2. The Parish Meeting is the civil parish authority for the parish of Hooton Roberts and Firsby, one of three parish meetings within the democratic framework of Rotherham Metropolitan Borough Council. It is a statutory body under the Local Government Act 1972 and a statutory consultee under section 42 of the Planning Act 2008 for this project. The parish lies immediately adjacent to the W1 solar generation area and the cable corridor route, and is directly affected by W1 in particular and by the development as a whole.
3. **Purpose of this Report.** This Report is provided to assist the Council in the preparation of its Adequacy of Consultation Representation (“AoCR”) to the Planning Inspectorate (“PINS”) at the acceptance stage of the proposed application. The Parish Meeting invites the Council to:
  - (a) have regard to the matters set out in this Report when forming the Council’s view on the adequacy of the Applicant’s pre-application consultation;
  - (b) draw upon any element of this Report — in full or in part — in the Council’s own AoCR; and
  - (c) append this Report in full to the Council’s AoCR as the Parish Meeting’s evidence on the adequacy of consultation.
4. **Approach.** The Parish Meeting has taken planning and legal advice in preparing this Report. It does not oppose renewable energy development in principle, and recognises the national policy framework for energy infrastructure. Its concern is narrower: an application for development consent of this scale and permanence - approximately 1,173 hectares for a generating capacity of up to 750 MW, with effects extending across at least sixty years - must be supported by a pre-application consultation that meets the standard required by the Planning Act 2008. The Parish Meeting’s view is that the consultation conducted by the Applicant does not meet that standard.

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

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## **B. The proposed development and consultation history**

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### **The proposed development**

- 6.** The Applicant proposes a solar generating station with associated battery energy storage and grid connection infrastructure, comprising three geographically distinct solar generation areas designated W1, W2 and W3 totalling approximately 1,173 hectares, for a stated generating capacity of up to 750 MW. The three areas are linked by cable corridor infrastructure and associated substations, and span the administrative areas of three local planning authorities: Rotherham MBC, the City of Doncaster Council, and North East Derbyshire District Council.
- 7.** The W1 area lies immediately to the west of the civil parish of Hooton Roberts and Firsby. The cable corridor connecting W1 to the wider grid connection infrastructure passes within or adjacent to the parish boundary. The Parish Meeting and its community are directly affected by W1, by the cable infrastructure within the parish, and by the cumulative effects of the development as a whole.

### **Consultation chronology**

- 8.** The Applicant's statutory consultation under sections 42, 47 and 48 of the Planning Act 2008 closed on 28 October 2025. A targeted consultation on described changes to the draft Order Limits ran between 4 March and 3 April 2026. A Programme Document, a Community Update Newsletter setting out revised masterplans for W1, W2 and W3, and a Targeted Consultation Leaflet running to 43 pages and 31 numbered changes were published in March 2026. The Environmental Statement supporting the application was finalised in April 2026 — approximately six months after the close of statutory consultation.
- 9.** That sequence matters. Between the close of statutory consultation in October 2025 and the intended May 2026 submission, the scheme has evolved materially, the environmental evidence has been completed, and the heritage baseline at W1 has been further investigated. The community has not been the subject of a further statutory consultation under sections 42, 47 and 48 in that period. The targeted consultation between March and April 2026 was, in its own terms, limited to a defined set of described changes - not a further statutory consultation.
- 10.** The Parish Meeting responded to the statutory consultation, responded to the targeted consultation, and engaged with the Applicant through correspondence during the pre-application period. The Parish Meeting also raised matters of concern with the Planning Inspectorate directly during the pre-application period on issues going to the adequacy of consultation rather than to the merits of the application.

### C. The adequacy framework in outline

- 11.** PINS may only accept an NSIP application for examination if it is satisfied that the applicant has complied with the pre-application duties in Chapter 2 of Part 5 of the Planning Act 2008 - in particular the section 42 duty to consult prescribed consultees, the section 47 duty to consult the local community, the section 48 duty to publicise the proposed application, and the section 49 duty to have regard to the responses received. Section 55(4) of the Act gives Adequacy of Consultation Representations from local authorities a particular status in that assessment: PINS is required to have regard to them.
- 12.** The decisive statutory question is whether the consultation undertaken complied with those duties in relation to the application *as submitted*. Earlier or provisional iterations of the scheme are not the test. Pre-application consultation is intended to be “front-loaded” - it is the stage at which the community can influence the scheme - and the statutory guidance issued in 2024 expressly anticipates that the design will evolve up to submission. The corresponding limit, which the same guidance recognises, is that the scheme as submitted must still be one whose likely effects have been “fully consulted upon”.
- 13.** The Parish Meeting accepts that scheme evolution between consultation and submission is lawful in principle and does not argue otherwise. The question in any individual case is one of degree: where the scheme has evolved materially in respect of its nature, its scale, its location, the identity of the communities affected, the likely environmental effects, or the substance of the planning judgment to be made, the earlier consultation may no longer satisfy the statutory duties. The courts have made clear in the planning context that the question is one of substance, not of how the applicant chooses to label the changes - the test is whether consultees had a fair opportunity to engage with the scheme actually being submitted.
- 14.** The common law adds two further requirements that have long been settled in consultation law generally. First, consultation must be undertaken on the basis of sufficient information to enable consultees to make an intelligent response; that requirement is reinforced in the NSIP context by the EIA Regulations, which require the Preliminary Environmental Information published during consultation to contain what is “reasonably required” for an informed view of the proposal’s likely significant effects. Second, the responses received must be conscientiously taken into account by the applicant.

- 15.** The five concerns the Parish Meeting raises in Sections D and E below are framed against that statutory and common law backdrop. Each goes to whether the consultation, in respect of the application that the Applicant now intends to submit, met the standard required.

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## D. Summary of the Parish Meeting's concerns

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- 16.** The Parish Meeting raises five concerns. The first four are primary concerns: each, in the Parish Meeting's view, is independently material to the adequacy of the consultation. The fifth concern brings together a series of further matters about how the consultation was operated which are most usefully understood cumulatively rather than as freestanding grounds. The strongest framing of the Parish Meeting's case, however, is the cumulative one: the concerns set out below are mutually reinforcing, and the case is stronger taken as a whole than as the sum of its parts.
- 17. Concern 1 — The submitted scheme is not the scheme that was consulted upon.** The Applicant's March 2026 revised masterplan - which the Applicant describes as the submission masterplan - differs from the scheme that the community was consulted upon in respects that affect where the impacts fall, which communities are affected, the configuration of associated infrastructure, and the planning balance overall. The community has not had a fair opportunity to comment on the scheme that is actually being submitted.
- 18. Concern 2 — The environmental evidence was incomplete during consultation.** The Environmental Statement was not finalised until April 2026, around six months after the consultation closed. Major elements - including the Agricultural Land Classification survey for W1, the Coal Mining Risk Assessment, the outline Construction Traffic Management Plan, the Flood Risk Sequential Test, and parts of the ecology and cumulative effects work - were either incomplete or absent from the consultation materials. The community was being asked to comment without the evidence it needed.
- 19. Concern 3 — Heritage and archaeology at W1 remain unresolved.** Archaeological trial trenching at W1 was still ongoing in March 2026 - after the statutory consultation had closed. The trial trench findings, which may identify previously unknown remains or require further mitigation and design changes, were not before consultees during the consultation. This concern is particularly acute for the Parish Meeting because of the proximity of W1 to the Conisbrough Parks Romano-British Villa (Scheduled Monument SM1491751, designated July 2025) and to other heritage assets in and around the parish.



- 20. Concern 4 — A targeted consultation cannot stand in for statutory reconsultation.** The Applicant has chosen to address the post-consultation changes through a targeted consultation rather than a fresh round of statutory consultation. It describes the changes as “minor proposed changes to the draft Order Limits”. The Applicant’s own materials make that characterisation difficult to sustain: the changes include the removal of entire solar field areas around multiple settlements, the removal of a substation, a 37% reduction in the developable solar area, the introduction of new contingency Brinsworth substation infrastructure with acknowledged flood, heritage and coal mining implications, and a dual-substation contingency arrangement. The question is one of substance, not labels.
- 21. Concern 5 — Cumulative concerns about the consultation process.** Three further matters about how the consultation was operated — the inconsistent Freepost address, the accessibility of the consultation for the most directly affected rural communities, and the Applicant’s treatment of the responses received - do not, individually, necessarily rise to the level of independent failings. Taken together with the primary concerns, however, they materially strengthen the picture that the consultation did not provide affected persons with a fair, stable and intelligible opportunity to engage with the scheme that is actually being submitted.

#### **THE PARISH MEETING’S SUBMISSION**

The Parish Meeting’s view is that Concerns 1, 2, 3 and 4 are each, individually, capable of supporting a finding that the pre-application consultation has not met the standard required by the Planning Act 2008 in relation to the application as submitted.

More importantly, these concerns are mutually reinforcing. The scheme has evolved materially after consultation; the environmental evidence available during consultation was incomplete; the heritage baseline at W1 was unresolved; the targeted consultation does not, in substance, substitute for fresh statutory consultation. Taken together with the Concern 5 process matters, the case is significantly stronger than the sum of its parts.

The Parish Meeting asks the Council to advance the case cumulatively in its AoCR - not as a series of discrete technical defects, but as a single procedural fairness narrative that the consultation, viewed as a whole, did not give the community a fair opportunity to participate in the scheme actually being submitted.

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## **E. The concerns in detail**

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

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

**PARISH MEETING'S VIEW**

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

**E2. The environmental evidence was incomplete during consultation**

- 26.** This concern is analytically separate from Concern 1. The first concern is about whether the project ultimately submitted differs from the project consulted upon. This concern is about whether the community had enough environmental evidence during the consultation to engage with the project at all.
- 27.** The Environmental Statement was not finalised until April 2026 — around six months after the close of the statutory consultation. The Environmental Statement material before the community during the statutory consultation was drawn from preliminary environmental information and described by the Applicant as such.
- 28.** In the intervening months, on the Applicant’s own account, the following work has been completed or substantially completed: archaeological trial trenching at W1; the outstanding part of the Agricultural Land Classification survey for W1 (the Applicant’s materials acknowledged that the survey covered around 45% of the W1 area at the close of consultation); ecology surveys including breeding bird, badger and bat work; landscape and visual assessment based on the revised masterplan; the transport assessment, including the outline Construction Traffic Management Plan; the Coal Mining Risk Assessment; the Flood Risk Sequential Test; and the Cumulative Effects Assessment. None of this completed work has been the subject of a statutory consultation.
- 29.** The Parish Meeting recognises that environmental statements are not required to be perfect at submission - the EIA regime allows for deficiencies to be identified and remedied during examination. The Parish Meeting does not contend that the Applicant’s Environmental Statement is so deficient that it ceases to qualify as an environmental statement at all. The concern is the more focused one: that the environmental information available *during the consultation* was not what is reasonably required for consultees to develop an informed view of the proposal’s likely significant effects. The categories of incompleteness - landscape, heritage, cumulative impacts, flooding, ecology - are precisely those that bear most heavily on the planning judgment for a scheme of this nature.

**PARISH MEETING'S VIEW**

Even if the masterplan had not changed at all between October 2025 and May 2026, the fact that the environmental evidence supporting the submission masterplan was finalised six months after the close of consultation would raise an adequacy issue in itself.

This concern is independent of, and additional to, the material divergence point at E1. Taken together, the two are mutually reinforcing: the community was consulted on a scheme the Applicant has now changed, on the basis of environmental information the Applicant itself acknowledged was incomplete and that has now been completed without the community being reconsulted.

**E3. Heritage and archaeology at W1 remain unresolved**

- 30.** The W1 area sits within a landscape of substantial archaeological sensitivity. The Conisbrough Parks Romano-British Villa was scheduled by the Secretary of State as Scheduled Monument SM1491751 in July 2025 - after the Applicant's draft Environmental Statement was finalised. The scheduling itself is significant: it is evidence that the heritage baseline relied upon during consultation was incomplete, in a way subsequently confirmed by the Secretary of State's designation decision. The wider W1 area contains a substantial range of further heritage assets, including the Firsby Lane medieval pottery industry, the Conisbrough Deer Park, a Roman drain (HER 02566/01), Iron Age enclosures, and a number of other recorded archaeological remains.
- 31.** On the Applicant's own Programme Document, archaeological trial trenching at W1 was due for completion in March 2026 - some five months after the close of the statutory consultation. The trial trench findings, which may identify previously unknown remains, alter the assessed significance of known remains, require further mitigation, or precipitate consequent design amendments, were not available to consultees during the statutory consultation period.
- 32.** Historic England's guidance on planning and archaeology, and the National Planning Policy Framework, are both clear that planning decisions on heritage assets must be based on sufficient information about significance, and that intrusive field evaluation may be necessary precisely because desk-based assessment alone is often not enough. The Parish Meeting's view is that, where the trenching is itself capable of altering the heritage understanding of W1, the consultation was being conducted on a heritage baseline that was known to be incomplete.

**PARISH MEETING'S VIEW**

This concern is of particular importance to the Parish Meeting because the W1 area lies immediately to the west of the parish and the heritage assets referred to either lie within or are closely connected to the parish.

The Parish Meeting also notes that this concern reinforces the wider argument advanced separately by Save Our Greenbelt that W1, W2 and W3 should properly have been the subject of three separate Development Consent Order applications. If W1 had been treated as a separate application, the trial trenching could have been completed and a complete heritage baseline established before any W1 application was submitted and this concern would fall away.

**E4. A targeted consultation cannot stand in for statutory reconsultation**

- 33.** The Applicant has chosen to address the post-consultation changes through a targeted consultation rather than a further round of statutory consultation under sections 42, 47 and 48. The targeted consultation ran for 31 days, from 4 March to 3 April 2026. The Applicant's characterisation of the changes is that they are "minor proposed changes to the draft Order Limits".
- 34.** As noted in Section C, the courts treat the question of whether further consultation is needed as a question of substance, not of how the applicant has chosen to label the changes. The Parish Meeting's view is that, on the face of the Applicant's own targeted consultation materials, the "minor" characterisation is not sustainable. Four points are relevant.

**(i) Scale and number of changes**

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

***(ii) The dual-substation contingency arrangement***

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

***(iii) Multiple unresolved cable route alternatives***

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

***(iv) Discouragement of resubmission***

- 38.** The Targeted Consultation Leaflet states that the Applicant has already considered the responses received during the statutory consultation and that consultees should not resubmit feedback already provided. That instruction narrows the scope of permissible response during the targeted consultation in a way that is difficult to reconcile with the duty to consult fairly, particularly where the evidence base has changed materially in the intervening months.
- 39.** Taking those four points together, the Applicant's own targeted consultation materials make the "minor" characterisation untenable. The targeted consultation is not, on this evidence, a substitute for the fresh statutory consultation that the scale of the changes properly required.



**PARISH MEETING'S VIEW**

The Parish Meeting respectfully asks the Council to read the Targeted Consultation Leaflet for itself. The Parish Meeting's view is that, once the Leaflet is read in full, the "minor" characterisation cannot be sustained.

If the Applicant later concedes that the changes were in fact material, the adequacy of the targeted consultation as a substitute for statutory reconsultation is directly in question. If the Applicant maintains that the changes are minor, that position is open to challenge by reference to the Applicant's own materials. Either way, the Council's AoCR is well-founded in raising this concern.

**E5. Cumulative concerns about the consultation process**

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

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

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

**(ii) Accessibility and reach of the consultation**

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

**(iii) Treatment of consultation responses**

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

**PARISH MEETING'S VIEW**

The Parish Meeting acknowledges that these process matters are unlikely, taken individually, to support a finding of inadequacy. Absent specific evidence of actual prejudice, the Freepost issue may be characterised as a clerical irregularity and the accessibility points as administrative imperfections.

The Parish Meeting's submission is the more limited one: these matters are most usefully advanced cumulatively. Read alongside the primary concerns, they materially strengthen the broader picture that the consultation did not give the community a fair, stable and intelligible opportunity to participate in the scheme that is actually being submitted.



## **F. The Hooton Roberts and Firsby Parish perspective**

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- 45.** The Parish Meeting draws the Council's attention to four matters bearing on the adequacy question specifically from the Parish Meeting's perspective.

### **Direct impact from W1**

- 46.** The parish lies immediately to the east of the W1 solar generation area, with the W1 boundary close to the parish boundary and cable corridor infrastructure proposed to pass within or adjacent to the parish. The parish will experience the direct landscape, traffic, heritage and amenity effects of W1, and the operational and decommissioning effects across a period extending at least sixty years. The Concerns at E1, E2 and E3 are of particular significance to the parish because of the proximity of W1, its heritage sensitivity, and the W1 trial trenching programme.

### **Statutory consultee status under section 42**

- 47.** As noted in Section A, the Parish Meeting is a statutory consultee under section 42 of the Planning Act 2008. It was entitled to be consulted in its own right as the civil parish authority for an area directly affected by the proposed development. The Parish Meeting asks the Council, in preparing its AoCR, to satisfy itself that the Applicant's consultation report records the consultation of the Parish Meeting in that capacity, and to record any deficiency in the Council's Representation.

### **Geographic isolation of the parish**

- 48.** Firsby lies administratively within Rotherham. The hamlet has no parish council, no parish offices, no resident-facing parish facility other than the parish meeting structure itself, and no public transport service that would permit residents to attend the public events held during the consultation. These features make the hamlet particularly dependent on direct engagement by the Applicant. The accessibility concerns at E5 are particularly pertinent to the parish for that reason.

### **A 60-year footprint in a long-occupied landscape**

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

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**G. Conclusion and requests to Rotherham MBC**

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- 50.** In summary: the community has not had a fair opportunity to comment on the scheme that the Applicant intends to submit; the environmental evidence available during the consultation was incomplete in material respects; the heritage baseline at W1 was unresolved at the close of the consultation; the targeted consultation does not, in substance, substitute for the statutory reconsultation that the scale of the changes required; and the cumulative process concerns at E5 reinforce the picture.
- 51.** The Parish Meeting respectfully invites the Council to take the following steps in the preparation of its Adequacy of Consultation Representation:
- (a)** to consider this Report in full when forming the Council's view, and to draw upon the analysis at Sections D, E and F in the body of the Council's Representation to the extent the Council considers it well-founded;
  - (b)** to append this Report in full to the Council's Representation, so that the Parish Meeting's evidence is placed formally before the Planning Inspectorate;
  - (c)** to frame the Council's Representation around the practical evidence of what changed, when, and what consultees did and did not have available to them — a chronology-based, evidence-led submission rather than a broad-brush assertion of unfairness;
  - (d)** to ask the Applicant to: (i) confirm whether all responses sent to the alternative Freepost address have been received and recorded; (ii) make available the trial trenching results for W1 and confirm the timing of any consequential design changes; and (iii) make available the Coal Mining Risk Assessment, the complete Agricultural Land Classification survey, the outline Construction Traffic Management Plan and the Flood Risk Sequential Test for the application area within the Council's administrative boundary;
  - (e)** to record in the Council's Representation the Parish Meeting's status as a section 42 statutory consultee and the Parish Meeting's position that the specific absence of any public event held within or convenient to the parish is a substantive consultation failing in respect of a community directly affected by W1 and the cable corridor; and
  - (f)** if PINS accepts the application notwithstanding the Council's Representation, to preserve the consultation adequacy concerns as live matters for examination by recording them in the Council's Local Impact Report and Relevant Representations.

- 52.** The Parish Meeting is grateful for the Council's consideration of this Report and remains available to provide any further information or clarification the Council may need. The Parish Meeting will make its own representation to the Planning Inspectorate at the appropriate stage, but considers it important, given the weight given to local authority AoCRs, to assist the Council in the preparation of the Council's own Representation in the manner set out above.

Submitted on behalf of Hooton Roberts and Firsby Parish Meeting



Chair, Hooton Roberts and Firsby Parish Meeting

*19 May 2026*

## H. Schedule of supporting documents

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

| No. | Document                                                                             | Date           | Author / Source          |
|-----|--------------------------------------------------------------------------------------|----------------|--------------------------|
| 1   | Whitestone Solar Farm — Programme Document                                           | March 2026     | Whitestone Net Zero Ltd  |
| 2   | Whitestone Solar Farm — Community Update Newsletter (revised W1, W2, W3 masterplans) | March 2026     | Whitestone Net Zero Ltd  |
| 3   | Whitestone Solar Farm — Targeted Consultation Leaflet (43 pp, 31 numbered changes)   | March 2026     | Whitestone Net Zero Ltd  |
| 4   | Whitestone Solar Farm — Statement of Community Consultation                          | 2025           | Whitestone Net Zero Ltd  |
| 5   | Planning Act 2008 — Pre-application stage guidance (section 50)                      | 2024           | DLUHC / DESNZ            |
| 6   | National Policy Statement for Renewable Energy Infrastructure (EN-3)                 | 2023 (updated) | DESNZ                    |
| 7   | Scheduled Monument designation — Conisbrough Parks Romano-British Villa (SM1491751)  | July 2025      | Secretary of State       |
| 8   | Historic Environment Advice Note 17: Planning and Archaeology                        | 2022           | Historic England         |
| 9   | National Planning Policy Framework, para 207                                         | December 2024  | DLUHC                    |
| 10  | Correspondence on Freepost address inconsistency                                     | Sept–Oct 2025  | Harthill with Woodall PC |



## **Laughton-en-le-Morthen Parish Council**

Incorporating Brookhouse, Carr, Slade Hooton and Newhall Hamlet

**The Village Hall  
Firbeck Avenue  
Laughton-en-le-Morthen  
SHEFFIELD  
S25 1YD**

**Telephone – 01709 528823**

**Email: [clerk@laughtonparishcouncil.gov.uk](mailto:clerk@laughtonparishcouncil.gov.uk)**

Date: 20th May 2026

### **Ms Lisa Brooks**

Development Manager – Strategic Applications  
Rotherham Metropolitan Borough Council  
Riverside House  
Main Street  
Rotherham  
S60 1AE

Dear Ms Brooks,

### **Whitestone Solar Farm – Adequacy of Consultation**

Laughton-en-le-Morthen Parish Council asks that Rotherham Metropolitan Borough Council take the following comments into account when considering the adequacy of consultation undertaken in relation to the Whitestone Solar Farm proposal.

The Parish Council understands that the proposed development is not located within the parish boundary of Laughton-en-le-Morthen. However, Council is concerned that Whitestone's consultation approach appears to have been based on defined zones, with the level of consultation received depending on a community's proximity to specific parts of the proposed infrastructure. While the Council understands that this was the approach adopted by Whitestone, it does not consider that this zoning strategy properly reflected the wider area likely to be affected by the proposal, particularly in terms of construction disruption, traffic movements, recreational use of the countryside, and visual amenity.

Many residents across the wider Rotherham area regularly travel through, walk in, visit, or commute across areas affected by the proposal. For those residents, the potential impacts are not remote. They may include disruption during the construction phase, changes to familiar walking routes and recreational areas, increased journey times, highway diversions, and changes to the visual amenity of landscapes which form part of their daily lives.

This concern has become particularly evident to the Parish Council through the comparatively smaller Common Farm Solar Farm development. Although that development is not within our parish, its construction phase has already had noticeable effects on local commuters, including disruption, diversions and increased travel times. In the Council's view, this demonstrates how solar developments can have a practical impact well beyond the immediate application site or host parish.

Council is therefore concerned that Whitestone has not taken sufficient steps to ensure that residents outside its selected consultation zones properly understand the scale of the proposal, the likely construction impacts, or how the application may affect their day-to-day lives. Council considers that many residents across the wider Rotherham area have had little or no meaningful information about the scheme, despite being likely to experience some of its impacts.

Council considers that the issue is not simply whether consultation has taken place in a procedural sense, but whether the communities likely to be affected have been given a fair and reasonable opportunity to understand the proposal and its likely day-to-day impacts.

For these reasons, Council considers that the consultation approach has been too narrowly focused and has not adequately reflected the wider communities likely to be affected by the proposed development.

The Parish Council would be grateful if these concerns could be noted by Rotherham Metropolitan Borough Council when considering the adequacy of consultation and the wider local impact of the proposal.

Yours sincerely,



Clerk to Laughton-en-le-Morthen Parish Council

# Ravenfield Parish Council

Ravenfield Parish Hall  
Birchwood Drive  
Ravenfield  
Rotherham  
S65 4PT

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[clerk@ravenfieldparishcouncil.gov.uk](mailto:clerk@ravenfieldparishcouncil.gov.uk)

19 May 2026

Ms Lisa Brooks  
Development Manager – Strategic Applications  
Rotherham Metropolitan Borough Council  
Riverside House  
Main Street  
Rotherham  
S60 1AE

Dear Ms Brooks,

## **Whitestone Solar Farm – Adequacy of Consultation**

Ravenfield Parish Council wishes to formally raise serious concerns regarding the adequacy of consultation undertaken by Whitestone Solar Farm during both the informal and statutory consultation stages of this proposed development.

At the outset of the consultation process, Ravenfield Parish Council was not included within consultation arrangements, as the parish was not initially identified by Whitestone as a “host parish”. It was only after concerns were raised locally, and the Parish Council actively requested involvement, that Whitestone acknowledged that the proposal would impact Ravenfield Parish and subsequently involved the Council within consultation discussions.

As a result, Ravenfield Parish Council was excluded from the early stages of engagement and missed the first stage of consultation entirely. The Council considers this to be a significant failing given the scale and potential impact of the proposed development upon the surrounding rural landscape and neighbouring communities.

The consultation events held by Whitestone were considered by many residents and members of the Parish Council to be inadequate and poorly organised. Only one local drop-in session was held within Ravenfield Parish at Ravenfield Parish Hall. The event concluded by 7pm, included no formal presentation and offered limited opportunity for meaningful engagement. Residents raised concerns that the timing and format of the event made attendance difficult, particularly for those working during the day, and that accessibility arrangements were poor.

The consultation material itself was also problematic. Maps and plans displayed at events were often unclear, incomplete and difficult to decipher, lacking sufficient detail for residents to properly understand the proposals. Parish Council representatives and members of the public found it difficult to identify the extent of the development, associated infrastructure and likely impacts upon Ravenfield Parish.

The Parish Council also wishes to raise concerns regarding the volume and complexity of the technical documentation provided throughout the consultation process. Many of the documents released by Whitestone were extremely lengthy, highly technical in nature and difficult for members of the public to meaningfully understand without specialist knowledge.

Residents repeatedly expressed concerns that important information was buried within extensive technical reports, making it unreasonable for ordinary members of the community to properly review and assess the likely impacts of the development. The scale and complexity of the documentation, combined with limited consultation periods, created significant barriers to effective public participation.

The Parish Council considers that consultees could not reasonably be expected to provide informed responses where information was overly technical, inaccessible and difficult to interpret.

Initially, there was no meaningful information provided regarding proposed cable corridors, despite the potentially significant impacts associated with underground cabling, construction works and land access arrangements. Even after more than two years of consultation and scheme development, many residents remain unclear regarding the true scale of the proposed solar farm, the extent of associated infrastructure, the likely disruption during construction and the long-term impact upon the landscape and character of the area.

The Parish Council also remains concerned that many residents are still unaware of the proposal altogether. In many cases, awareness within the local community has only been achieved through the efforts of the Parish Council in publicising the development and sharing information with residents.

Residents and Parish Council representatives also found that many questions raised during consultation events could not be adequately answered by Whitestone representatives. It was apparent that representatives had limited knowledge of the local area and were unable to provide clear responses regarding local concerns.

In particular, Whitestone representatives were unable to provide satisfactory information relating to flooding and drainage impacts, construction traffic routes, biodiversity impacts, impacts upon bridleways and public rights of way, land access arrangements and the cumulative impacts arising from other nearby developments and infrastructure proposals.

The Parish Council considers that the lack of available information significantly restricted the ability of residents and consultees to provide informed responses during consultation. Residents and consultees could not properly assess the likely impacts of the scheme because sufficient and meaningful information was unavailable throughout much of the consultation process.

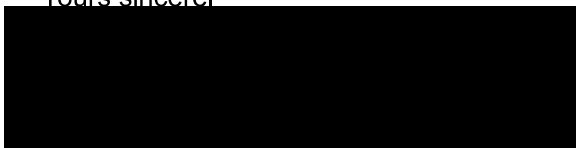
Ravenfield Parish Council also shares the concern that the developer's chosen approach to engagement has not captured all individuals and communities that will ultimately be affected by the proposal.

The Council considers that the consultation process has too often appeared focused upon satisfying minimum statutory requirements, rather than ensuring genuine and meaningful engagement with affected communities.

Ravenfield Parish Council respectfully requests that Rotherham MBC gives full consideration to the concerns outlined above when preparing its submission regarding the adequacy of consultation.

We would appreciate confirmation of receipt and would welcome being kept informed of any further developments relating to this matter.

Yours sincerely



Clerk to Ravenfield Parish Council

**Please note:** This correspondence has been sent by email only to the address of: [lisa.brooks@rotherham.gov.uk](mailto:lisa.brooks@rotherham.gov.uk) No hard copy will follow.



## **Proposed changes to the boundary of Whitestone Solar Farm, known as the 'draft order limits'.**

**Below are the Responses from Treeton Parish Council in Respect of Changes Numbers 8 to 13**

### **Number 8**

**Description of Change:** Additional land is proposed along Long Lane southwest of Whiston to allow the proposed access to Cable Route E, to comply with highway safety standards for visibility and temporary speed reductions if required.

**Impact of Change:** This change may lead to the loss of hedgerow and roadside vegetation. This impact is already being considered within the EIA being undertaken to support the Proposed Development. The Proposed Development will include commitments to planting new hedgerows and creation of additional areas of habitat including safeguarding of any species as needed. With suitable mitigation, this change is unlikely to lead to significant adverse effects

*Response - This will involve taking land from each side of Long Lane at both ends of the proposed Substation and will contribute further to the overall loss of habitat and change visible appearance.*

### **Number 9**

**Description of Change:** While the grid connection is to the Long Lane 400kV Substation, the Applicant notes that this substation is still in planning and has not yet been constructed. Therefore, additional land is being proposed to connect into the existing Brinsworth substation if for any reason the new Long Lane 400kV Substation is not constructed. Works would include underground cabling to the substation.

**Impact of Change:** As the change consists of running an underground cable, the potential effects could be flood risk, cultural heritage and land and soils due to a high risk from coal mining. These constraints would need to be fully assessed and construction work would be managed to limit and mitigate potential impacts.

*Response -Treeton Parish Council's view is that there **is insufficient information provided by the developer for it to give any informed feedback**. This is however a significant tranche of land which would appear to run between the existing Brinsworth and the proposed substations. This boundary change will significantly increase the size of the development around Treeton where there has been no mitigation following either the informal or statutory consultation phases. We will write to you separately about this matter. The PC has always maintained that this development is too big and will have a damaging effect on the unique character of the village*

*Not only will this boundary change significantly extend the size of the development, it relates to land which is known to routinely flood but you have failed to date to undertake any impact assessments where significant risks have already been identified relating to flooding, cultural heritage and previous coal mining activity*

*It is of concern that these impact assessments have not been undertaken given their potential to significantly affect residents, the environment and grid connectivity.*

*The establishment of this link will involve much earth work and will add significantly to the disruption during construction.*

#### **Number 10**

**Description of Change:** Additional land is proposed south of the M1 between Treeton and Pleasley Road (A618) to provide for an alternative cable route option south of the M1. This is an alternative cable route option to Cable Route D-1, which is north of the M1, and could provide an alternative route to the grid connection location at Long Lane 400kV Substation, subject to engineering assessments.

**Impact of Change:** This change is not anticipated to result in any impacts that are not already being considered within the EIA being undertaken to support the Proposed Development. Any noise generated during construction of the cable corridor is already being assessed in the EIA and industry best practice mitigation will minimise any short-term disturbance on nearby receptors. Construction work will be managed in a way to minimise any disturbance on receptors through an Outline Construction Environmental Management Plan. This change is unlikely to lead to significant adverse effects.

*Response - This change will result in the loss of a significant amount of prime agricultural land and will again add to the size of the development around Treeton.*

*This work will also significantly increase disruption during construction.*

#### **Number 11**

**Description of Change:** Additional land is proposed along Long Lane northeast of Treeton to allow the proposed access to solar area to comply with highway safety standards for visibility and temporary speed limits if required. The works could include trimming hedges or roadside vegetation for safe visibility, temporary road signage for managing safe access and temporary speed limits during construction if required.

**Impact of Change:** This change may lead to the loss of hedgerow and roadside vegetation if other mitigations such as temporary speed limits are not feasible. This impact is already being considered within the EIA being undertaken to support the Proposed Development. The Proposed Development will include commitments to planting new hedgerows and creation of additional areas of habitat including safeguarding of any species as needed. With suitable mitigation, this change is unlikely to lead to significant adverse effects

*Response - This will involve taking land from each side of Long Lane, below the sewer treatment plant to the bend before the motorway underpass, and will contribute further to the overall loss of habitat and change visible appearance.*

#### **Number 12**

**Description of Change:** Additional land is proposed along Pleasley Road (A618) to allow the proposed access to Cable Route F, to comply with highway safety standards for visibility and temporary speed limits if required. The works could include trimming hedges or roadside vegetation for safe visibility, temporary road signage for managing safe access and temporary speed limits during construction if required.

**Impact of Change:** This change may lead to the loss of hedgerow and roadside vegetation if other mitigations such as temporary speed limits are not feasible. This impact is already being considered with the EIA being undertaken to support the Proposed Development. The Proposed Development will include commitments to planting new hedgerows and creation of

additional areas of habitat including safeguarding of any species as needed. With suitable mitigation, this change is unlikely to lead to significant adverse effects

*Response - This will involve taking additional land from each side of Pleasley Road and will contribute further to the overall loss of habitat and change visible appearance.*

*Pleasley Road is a fast, busy and dangerous road which has seen a high incidence of traffic accidents and fatalities over the years. Heavy construction work on this road will increase the risk to road safety. It carries a high traffic load and should this work proceed it will significantly impact traffic flow.*

#### **Number 13a**

**Description of Change:** Additional land is proposed west of Burnt Wood and east of Treeton to provide for an alternative cable route option to Cable Route G-1. This alternative cable route is likely to be a better engineering route to connect the solar areas north of Treeton due to the topography of the land.

**Impact of Change:** This change is not anticipated to result in any impacts that are not already being considered within the EIA being undertaken to support the Proposed Development. Construction work will be managed in a way to minimise any disturbance on receptors through an Outline Construction Environmental Management Plan. This change is unlikely to lead to significant adverse effects

*Response - This represents a further and significant loss of agricultural land and will affect local habitat and visible appearance.*

#### **Number 13b**

**Description of Change:** Additional land is proposed along Treeton Lane to provide an additional access point to and from the solar area. This change has been proposed in response to consultation feedback about the potential traffic impacts of the proposed access point on Long Lane. This access point is being proposed in addition to the access point on Long Lane to either reduce traffic impacts on Long Lane, or remove that access point altogether. The proposed access includes additional land to access solar area, to comply with highway safety standards for visibility and temporary speed limits if required. The works could include trimming hedges or roadside vegetation for safe visibility, temporary road signage for managing safe access and temporary speed limits during construction.

**Impact of Change:** This change may lead to the loss of hedgerow and roadside vegetation. This impact is already being considered within the EIA being undertaken to support the Proposed Development. The Proposed Development will include significant commitments to planting new hedgerows and creation of additional areas of habitat including safeguarding of any species as needed. With suitable mitigation, this change is unlikely to lead to significant adverse effects.

*Response - The Parish Council considers this a major change to the development and like many of the changes proposed during this 'targeted consultation' will result in the loss of more of the green belt around Treeton. Treeton has three access and egress routes of which Treeton Lane is one. There are major concerns relating to road safety, the road has a high incidence of accidents, many of which go unreported. The stone wall, opposite the proposed entrance, and extending hundreds of meters was rebuilt several years ago but has been mostly destroyed as a result of vehicle accidents which serves to demonstrate the real safety issues associated with this road*

*During the proposed construction timetable, Treeton Lane will become the main access route in and out of Treeton due to bridge replacement work at Catcliffe which will take in excess of three years, the contract has yet to be awarded, and massive construction works on Long Lane which, in addition to Whitestone, may include a large housing development and the likely construction of the proposed substation.*

*Treeton Lane has a junction with Pleasley Road at Aughton where long queues are routinely experienced. Early mornings and evenings frequently have tail backs stretching up to half a mile with very long delays.*

*Should Treeton Lane become the major access route to the solar farm, particularly during construction, residents of Treeton face a likely scenario of being unable to access and egress the village for what will run into years and this is totally unacceptable.*

### **Number 13c**

**Description of Change:** Additional land along Pleasley Road (A618) is being proposed for landscaping to minimise potential glint and glare impacts on the adjacent road. Works could include the planting of trees, hedges or other landscaping and visual barriers as needed.

**Impact of Change:** The impact is dependent on type of visual screening. There is a preference for planting of hedgerows and trees which would have beneficial impacts on habitat creation and connectivity. It may be necessary to install temporary fencing whilst vegetation establishes, however it is expected that any adverse impact would be not significant as receptors would be driving and views impacted would be fleeting

*Response -The Parish Council cannot overstate the perilousness of Pleasley Road and its accident history, particularly where this boundary change is proposed. There is concern that the proposed measures to address glint and glare must be properly risk assessed given the road safety issues . Immature trees will take time to establish and will need to provide year round cover.*

*In your assessment you are dismissive of the adverse impact of your proposal stating that 'receptors would be driving and views impacted would be fleeting'. This area, where your panels will be sited, is one of extensive local beauty; it is entirely inappropriate and profoundly insensitive to describe the impact as 'fleeting'. For people who are local to this area the impact will be overwhelming.*



Clerk to the Council – [REDACTED]  
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Website: [www.treetonparishcouncil.gov.uk](http://www.treetonparishcouncil.gov.uk)

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16 February 2026

Ms Lisa Brooks  
Development Manager Strategic Applications  
Rotherham MBC  
Riverside House  
Main Street  
Rotherham  
S60 1AE

Dear Ms Brooks

### **Whitestone Solar Farm – Inadequacy of the Consultation Process**

Treeton Parish Council is deeply dissatisfied with the consultation process undertaken by Whitestone at both the informal and statutory consultation stages of this proposed development. At no point has the process been transparent, meaningful or fit for purpose.

Written communication with residents throughout has relied heavily on flyer distribution, which by many was reportedly mistaken for junk mail and discarded as it resembled commercial advertising for domestic solar panels.

### **Informal Consultation**

At the informal stage of consultation 8 public events were held across the entire development which was inadequate in number with no event held in Treeton resulting in residents having to travel to other venues. The events were poorly advertised resulting in lacklustre attendance. Moreover, the information presented at these events largely comprised large maps displayed on tables which residents found extremely difficult to read. The maps and associated literature did not clearly show the locations of the proposed development. In the case of Treeton, the print was so small it was impossible to identify as a location. At these meetings it was clear that Whitestone representatives had a poor knowledge of the area and were unable to provide adequate responses to local concerns.

At the end of this initial process local communities remained largely ignorant of the proposed development.

### **Statutory Consultation**

Despite being more than two years into planning, Whitestone, at the end of the statutory consultation stage, has failed to provide clear information on the siting of many critical infrastructure components including: -

- Cable corridors
- Battery storage areas
- Primary and secondary substations
- Associated infrastructure.

As a result, the proposals presented during the statutory consultation were unclear, incomplete and left residents insufficiently informed about the true scale and impact of the development. This important stage of consultation was premature and residents remain ignorant as to where critical infrastructure will be sited and its impact on the landscape and local communities.

## **Statement of Community Engagement**

Whitestone's *Statement of Community Engagement* (September 2025), produced to meet the statutory consultation requirements of the Planning Act 2008, divided residents into Inner Zone and Outer Zone categories, based on perceived levels of impact determined by proximity to the proposed development. This approach has resulted in serious omissions and failures in engagement.

### **(i) Inner Zone Residents**

Whitestone's consultation document in relation to the statutory consultation states that public events would be held ***"at a variety of times, including evenings and weekends to enable participation by people with different time commitments."*** In reality:

- Only seven public drop-in events were arranged across the entire development area
- These covered a distance of over 25 miles, from Conisbrough in the north to Harthill and Woodall in the south
- The events spanned 22 host parishes
- There were no formal presentations
- Only one Saturday morning event was held
- No events finished after 7pm

All of the above severely restricted access to the events for working residents and fell well short of the stated commitment to accessibility.

The statutory consultation period itself was limited to just six weeks, close to the legal minimum. Given the scale, complexity and impact of what is proposed, this timeframe was wholly inadequate.

There has been little meaningful engagement with Treeton Parish Council or its residents. Whitestone repeated its failure to offer Treeton a consultation meeting despite the village's requests and close proximity to a significant part of the development.

It was only after persistent intervention by our Member of Parliament, Sarah Champion, that a meeting was eventually arranged. This meeting was held at very short notice, limiting attendance. When it did take place, Whitestone's representatives demonstrated a dismissive attitude and an unwillingness to address legitimate concerns. They were unable to provide satisfactory responses to questions relating to flooding, construction traffic access, biodiversity impacts and community benefit among others.

The list of unresolved issues is extensive and the engagement was wholly inadequate.

### **(ii) Outer Zone Residents**

Whitestone has failed seriously to consult with residents in neighbouring villages bordering the proposed development area. In the case of Treeton, as a 'Host Parish Council', no material consultation has taken place with the neighbouring parishes of Catcliffe, Waverley or Orgreave.

As a result, the majority of residents in these communities have little knowledge of the proposed development, nor any meaningful understanding of how it will affect them and the surrounding landscape.

This is a major omission. Due to the sheer scale and prominence of the proposed solar farm, its impacts will extend well beyond the immediate host parishes, affecting residents across Rotherham and much of South Yorkshire impacting the landscape for generations. Consultation should have been far more extensive.

Instead, engagement with Outer Zone residents has been limited to:

***“Publicising the consultation via the project website, email updates to a ‘keep informed’ list, social media advertising, statutory notices, and press releases to local media.”***

This approach has resulted in a woeful and disturbing lack of public awareness among large sections of the local community.

## **Conclusion**

Whitestone’s *Statement of Community Consultation* appears to be designed solely to satisfy the statutory requirement to consult, rather than to genuinely engage with affected communities.

At both stages of consultation, Whitestone has ignored the concerns raised by Treeton Parish Council and its residents, set aside no land to mitigate local impacts and failed to account for the cumulative effects including the proposed National Grid Substation, itself a major infrastructure project, and a 170 home development to be sited adjacent to the substation.

It is entirely unacceptable that a Nationally Significant Infrastructure Project (NSIP) of this magnitude consuming approximately 3,400 acres of Green Belt land should proceed on the basis of such superficial and inadequate engagement.

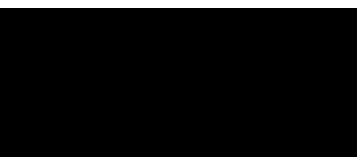
The consultation process is unfit for purpose and Treeton Parish Council firmly belief that the Secretary of State should declare the entire consultation process invalid.

Treeton Parish Council asks that Rotherham MBC Planning Department acknowledge receipt of this letter and confirm how these serious concerns regarding the adequacy of the consultation process will be addressed?

In particular, we would welcome clarification as to whether Rotherham MBC intends to make formal representations to the Secretary of State regarding the deficiencies outlined above.

We would also appreciate being kept informed of any updates or decisions relating to this matter and are willing to meet to discuss our concerns in more detail should that be helpful.

Yours sincerely



Parish Clerk  
Treeton Parish Council

***(This letter was sent electronically to the address of: [lisa.brooks@rotherham.gov.uk](mailto:lisa.brooks@rotherham.gov.uk))***



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**Telephone 07868 813 547 Email: treetonpc@aol.com**  
**Website: treetonparishcouncil.gov.uk**

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Consultation Team  
Whitestone Solar Farm  
Freepost  
SEC Newgate UK Local

21<sup>st</sup> October 2025

Dear Sir/ Madam

**Re: Formal Objection to the Proposed Whitestone Solar Farm**

Treeton Parish Council formally objects to the proposed Whitestone Solar Farm Development. Having engaged extensively with residents, attended consultation events and reviewed the materials made available, the Parish Council can confirm that the **overwhelming majority** of Treeton residents strongly oppose this development.

Treeton is a historic village of just over 3,000 residents, recorded in the Domesday Book and with a church dating back to the 11th century. The surrounding landscape, once scarred by deep and open-cast mining, has undergone several decades of natural regeneration to become a rich and thriving ecosystem. The proposed Whitestone project would reverse that recovery, destroying habitats and erasing our village's rural character.

This proposal is disproportionate in scale, inadequate in consultation, and profoundly damaging to the environment and the identity of our landscape.

Our objection is based on the following:

**1. Inadequate and Misleading Consultation**

Treeton Parish Council is deeply dissatisfied with the consultation process, which has been neither transparent nor meaningful. Despite being two years into planning, Whitestone has yet to determine the siting of many infrastructure components including cable corridors, battery storage areas, primary and secondary power stations and other infrastructure. The plans for this development are not sufficiently clear and this formal phase of the consultation is premature.

Written communication with the public has been via flyers which many residents did not read mistaking them for junk mail advertising solar panels!

Only seven public drop-in sessions were arranged across the entire development which will range from Conisborough in the north to Harthill and Woodall in the south, covering a distance of over 25 miles and affecting 22 parishes where solar panels will be physically sited. The drop-in sessions did not include formal presentations with most taking place during working hours effectively excluding many residents. The statutory consultation period has been limited to almost the bare minimum of six weeks.

There has been little, and no meaningful engagement with Treeton Parish Council or its residents. Whitestone failed to offer Treeton a consultation meeting in the first round of informal consultation despite the village's close proximity to a large part of the development. In this second round of statutory consultation, it repeated the mistake and it was only after persistent pressure from our MP, Sarah Champion, was one arranged at very short notice limiting the number who could attend. When it finally took



place, Whitestone's representatives demonstrated a dismissive attitude and an unwillingness to address legitimate concerns. They were unable to answer adequately questions on issues such as flooding, access during construction, biodiversity and community benefit. The list is not exhaustive.

Whitestone has largely failed to consult with inhabitants of the local area where solar panels or infrastructure are not planned to be physically sited. This is a major omission as all of the residents of Rotherham and well beyond will be affected by this development because of its scale and prominence across South Yorkshire. Consultation should have been more extensive and this failing has led to a woeful and disturbing lack of public awareness amongst sections of the community. The impact of this development on the wider population and on human health will be enormous.

Whitestone's 'Statement of Community Consultation' seems to be aimed at merely satisfying its statutory requirement to consult. At both stages of consultation Whitestone has chosen to ignore completely the concerns put forward by the Parish Council and its residents, has set aside no land to mitigate impact and has failed to take account of the proposed National Grid Sub Station next to Treeton which in itself is a major infrastructure project.

It is simply unacceptable that a Nationally Significant Infrastructure Project (NSIP) of this magnitude covering 3400 acres of green belt land should proceed under such superficial engagement. The consultation process is unfit for purpose and unsafe and as such we believe that the relevant Secretary of State should declare the whole consultation process null and void.

## **2. Flooding Risk**

Flooding is a major and immediate concern. Treeton has a well-documented history of flood events, most recently in 2023, when the village was cut off for two days due to all three access routes being submerged.

The proposed site in Treeton lies within an area known for surface water accumulation and runoff. The large-scale installation of solar panels and associated infrastructure will increase impermeable surfaces, increase soil compaction and worsen downstream flood risk.

There have been no topographical/relief maps provided by Whitestone, these would show the contours and the steep relief of the proposed development in the Parish of Treeton.

The natural drainage for this site follows the lie of the land into a valley, where the natural base flow enters the Ulley Brook, from there into the River Rother catchment basin. This basin is particularly flashy with the flood frequency increasing significantly in recent years, mainly due to urbanisation in the surrounding catchment, river management schemes which control flooding in surrounding urbanised town centres and the uncertainty of 'normal' /expected climatic expectations.

An increase in industrialised impermeable surfaces such as solar panels will compromise this catchment further and the implications on Treeton and Catcliffe residents will be considerably more dangerous.

Impermeable surfaces will increase the intensity of flow directly onto what will be compacted surfaces after the works are completed on the erection of the panels. Such an increase in flow will therefore cause further overland flow and shorten the lag time of the water entering the river basin. This will in turn increase the flashy nature of the River Rother potentially increasing the frequency and magnitude of flood events in this area.

Currently, these fields are arable and this benefits infiltration rates into the ground which causes the rainwater to become ground water rather than overland flow. This slows the passage of water into the base flow river and allows the water to pass through the basin in a more controlled manner. You have stated to us that the ground under and between the panels will be grass and that infiltration rates will not be impacted. We reject this hypothesis. With such a huge area now covered with impermeable surfaces there is a significantly increased flood risk.

Whitestone's documentation provides no convincing hydrological modelling or mitigation strategy. The responses to our queries were evasive and inadequate. This omission is unacceptable and poses a real danger to residents and property.

### **3. Long Lane and Construction Traffic**

The proposed use of Long Lane for construction traffic is entirely inappropriate. The road is narrow, dangerous albeit a main access route for residents. Whitestone's own figures project over 630 construction vehicles per day, including more than 200 HGVs, operating for extended hours.

This traffic volume, coupled with the nearby proposal to build the proposed National Grid Sub Station (itself consuming 18 acres of green belt), will cause serious congestion, safety hazards, and prolonged disruption for residents. Two of the three access routes to the village are inadequate for such heavy use, risking bottlenecks and delays for emergency vehicles and essential services.

The lack of a coordinated traffic management plan, especially in light of concurrent infrastructure projects, is indefensible. It was staggering to learn that Whitestone had not even considered traffic management issues at this stage of the project including the impact on residents who use this as a main entry/exit point to Treeton. As we stated at the consultation meeting access to Long Lane from Treeton and Whiston, the only two access points, are clearly signed as unsuitable for heavy vehicles.

### **4. Biodiversity and Habitat Loss**

Since the end of mining, Treeton's landscape has experienced a remarkable ecological recovery. Wetlands, woodlands, and grasslands now provide habitat for a wide range of species.

The areas proposed for the siting of solar panels around Treeton support a large population of birds through the winter including Tree Sparrows, Chaffinches, Linnets, Goldfinches, Reed Buntings and Yellowhammers and records of these species do exist. Access to some of the areas has made recording a challenge, but records of these species have been submitted to the Rotherham Biological Records Centre by our Parish Councillor, Robert Croxton who has advised that surveys through the breeding season will not highlight this habitat. It is of note that these areas also have a high population of Brown Hares.

Whitestone's ecological assessment is wholly inadequate. Local experts, including those identified by the Parish Council, have been ignored, and the applicant's 'consultants' simply have no knowledge of our local habitat. RMBC does not currently employ an ecologist and the Yorkshire Wildlife Trust does not have anyone with specific knowledge of Treeton's habitat or wildlife. Without this local knowledge a proper environmental assessment cannot be made – it seems Whitestone has employed experts/consultants for the sole purpose of ticking the appropriate 'environmental boxes'.

This development will destroy vital green corridors, reduce biodiversity, and undermine years of regeneration. Serious mitigation by removing solar panels is requested to offset this loss.

### **5. Cumulative Development and Environmental Impact**

Whitestone has failed to sufficiently consider other significant solar and housing developments which impact our environment. **In Whitestone 2 (W2) alone** RMMC is in the process of considering or have already approved numerous planning applications.

These include:

- Path Energy – Common Farm Solar Park, Dinnington (290 acres) already approved and under construction
- Abei Energy – Piper Lane Solar Farm, North of Anston (100+ acres, 72,000 panels)
- Exagen Development Ltd, near Wickersley (254 acres)
- Downing Renewables, Aughton – 3,000 panels, already approved.

- Newton Energy, Thurcroft, BESS
- Harmony Energy, Thurcroft, BESS
- Two large scale housing developments at Hellaby (260 homes) and at Shrogswood Road in Whiston (217 homes) both taking up a further 18 acres of land

The above excludes all of the nearby developments outside the catchment area of W2. For example, Root Power is to planning to build a Battery Energy Storage System (BESS) in neighbouring Brinsworth.

Neither Whitestone nor RMBC's Environmental Impact Assessments acknowledge this cumulative burden. The absence of a coordinated regional assessment is unacceptable and misleading to the public.

South Yorkshire has seen and continues to see a massive increase in the building of huge industrial units, car parks, large petrol stations etc which can, but rarely do, host solar panels. This is allowed whilst our green belt is consumed by the panels.

## **6. Loss of Agricultural Land and Food Security**

Almost 3400 acres agricultural land would be lost under Whitestone's proposal alone. This at a time when the population is increasing and food security is a national priority. The payments offered to landowners are so lucrative that many feel compelled to lease their land for 60 years. It has also been alleged that if landowners refuse to surrender land, it could be acquired compulsorily at less favourable rates.

Once converted to solar use, this land will not return to viable agricultural production. This approach undermines the UK's food independence and contradicts national sustainability goals. The displacement of food production in favour of industrial energy generation is a short-sighted and a regressive policy choice.

## **7. Ethical and Environmental Concerns Over Panel Sourcing**

There are widespread concerns that Whitestone's panels will be sourced from Chinese manufacturers, whose supply chains have been linked to forced labour and high-carbon production methods.

To brand this project as "green" or "sustainable" is deeply misleading if the technology used carries such ethical and environmental liabilities. The Parish Council urges RMBC and national authorities to require full supply chain transparency and independent verification before any such development is approved including the assessment of threats to national security, including potential cyber-attacks, associated with the use of Chinese produced panels and components.

## **8. Impact on Treeton's Identity and Rural Character**

Treeton's historical and cultural heritage is central to its community identity. The village's origins date back to at least the 11th century, and its rural surroundings have always been integral to its sense of place.

The Whitestone development threatens to overwhelm the village on an industrial-scale. The result of the solar arrays would be a permanent erosion of landscape character, a loss of accessible green space and a reduction in residents' quality of life.

Over the last 20 to 30 years Treeton has been forced to accommodate several large scale housing developments, more than doubling the size of the village, causing major disruptions and eroding our green belt. Also, the Waverley housing development of over 4,000 new properties is taking place on our doorstep to the immediate west of Treeton. The cumulative impact is an enormous threat to our village identity.

## **9. Disproportionate Scale, Duration of Impact and Decommissioning**

At 750MW, Whitestone would be the largest solar farm in Europe, far exceeding comparable schemes elsewhere in the UK. It is disproportionate in scale and deeply damaging to Treeton and its surrounding.

The construction period of two years will cause massive disruption, affect the condition of our roads, air quality and once built it will dominate the landscape. Its operational lifespan of 60 years will affect current residents and their children for generations.

Should the proposal be approved, it is essential that firm and legally enforceable commitments are secured to ensure the land is returned to agricultural use and reinstated as part of the Green Belt once the operational period of the solar installation has ended. A comprehensive decommissioning and restoration plan should be required by condition and supported through a legal agreement to guarantee the complete removal of all infrastructure, cabling, and hardstanding, together with the restoration of soil quality to a level suitable for productive agricultural use. The agreement should also secure the necessary investment in supporting infrastructure, such as access improvements, drainage, and landscaping, to protect the integrity of the site during its operation and to facilitate its successful reinstatement upon decommissioning.

#### **10. Community Benefit**

A community benefit fund of £300,000 has been proposed but this would be of little financial benefit to our small parish irrespective of how the fund was administered. It is the local communities who will have endure the effects of this major industrialisation of our green space but it will be the investors and developers who take the profits. £300,000 shared between 22 shared is no benefit for the widespread destruction of a large part of South Yorkshire. When you were asked 'What are the actual benefits to Treeton of this project?' there was a deafening silence.

Rather there should be clear and enforceable measures to ensure that the communities most directly affected by the development receive appropriate and lasting benefits. The level of financial contribution to local parish councils reflecting the scale and duration of the impact on the local area. Consideration should also be given to a local energy discount scheme offering reduced energy costs for households situated within a defined proximity to the site. These measures would ensure that the community shares in the benefits of the scheme in a meaningful way and that the obligations associated with its delivery are transparent, equitable, and fully secured through binding planning mechanisms.

#### **11. Green Nation and Energy Security**

Green Nation (GN) currently manages 75 solar farms and more than 700 solar rooftop installations with a portfolio total of 200 MW. Only 5 of the 75 solar farms were developed by GN, this is insignificant in relation to the size of the proposed development.

The development is intended to produce 750 MW and is of NSIP status. It is deeply troubling that Whitestone has remained silent throughout the consultation concerning its experience, competence and financial ability to deliver a project of such magnitude and complexity,

It is clear that Green Nation does not have the funding to support this project and you advised that you would be looking to the financial markets to secure the required capital should the development be approved. We would expect that due diligence is exercised when sourcing future capital to ensure our future energy supply is secure should funding come from a hostile state, organisation or individuals.

#### **12. Mitigation**

Following initial consultation, you did not remove any of the land from your initial proposal concerning Treeton in order to mitigate the impact of the development except for a tiny strip of land which was taken out at the landowner's request.

Given the increased threat of flooding to Treeton and Catcliffe which this development presents, the congestion associated with the construction of Brinsworth B on Long Lane, unmanageable traffic during construction due to access restriction and the significant loss of wildlife we want to see the land around **Treeton removed from Whitestone 2 in its entirety**. Should this be refused there needs to be a sufficient portion of land removed to mitigate all of the identified risks.

## **Conclusion**

Treeton Parish Council recognises the need for renewable energy and responsible climate action. However, this project is neither responsible nor sustainable. It represents environmental harm, procedural failure and the marginalisation of local voices. For the reasons outlined above including inadequate consultation, flood risk, unmanageable traffic, biodiversity loss, cumulative solar and other development sprawl, loss of farmland, ethical concerns, disproportionate impact and major concerns about the deliverability of the project. **Treeton Parish Council formally and strongly objects** to the Whitestone Solar Farm proposal.

Should this proposal progress, we will do everything we can to urge the Secretary of State for Energy Security and Net Zero to reject this application and to initiate a transparent review of how large-scale renewable energy projects are being sited, assessed and imposed on rural communities.

Yours faithfully,



Chairperson

**Treeton Parish Council**

On behalf of the residents of Treeton

[REDACTED]  
Parish Clerk & Responsible Financial Officer  
Ulley Parish Council  
C/o Ulley Village Hall  
Main Street  
Ulley  
S26 3YD

20 May 2026

Dear Lisa Brooks

**Re: Whitestone Solar Development (Consultation Period 16 September to 28 October)**

Ulley Parish Council confirms that the attached submission represents our final position on the adequacy of consultation for the proposed Whitestone Solar Farm development. We consider that the consultation undertaken by the developer was inadequate, with incomplete and inaccurate documentation, missing records, insufficient time for meaningful engagement, and an inability to provide clear answers to questions raised by parishioners in both written and verbal communications. The developer also declined our request for a short extension to the consultation period. We request that this submission be appended in full to RMBC's formal response to the Planning Inspectorate.

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## **Ulley Parish Council – Submission on the Adequacy of Consultation**

This response draws on issues identified during the statutory consultation period (16 September to 28 October) and subsequent public engagement events.

### **1. Scale of Development and Adequacy of Submitted Evidence**

The Parish Council considers the scale of the proposed development to be excessive and inappropriate for its rural setting. There is insufficient evidence to demonstrate that the cumulative and site-specific impacts of the proposal have been fully assessed, particularly in relation to landscape character, residential amenity, highways, ecology, and public rights of way.

The Environmental Impact Statement and supporting documentation are overly complex, not readily accessible, and were incomplete and inaccurate at the time of consultation. Errors were identified and acknowledged, yet no revised or complete information was provided within a timeframe that allowed for meaningful scrutiny. The Parish Council considers this to represent a material procedural weakness in the consultation process.

### **2. Consultation Process and Availability of Information**

A public consultation event was held in Ulley on 14 October, leaving only a limited period before the consultation deadline of 28 October. This restricted the ability of the community and statutory consultees to review information, seek clarification, and submit informed responses. The Parish Council considers that the consultation did not provide a reasonable opportunity for informed engagement and that this should be afforded significant weight in the planning assessment.

### **3. Unassessed Impacts and Absence of Mitigation**

Evidence was submitted by residents demonstrating potential shadowing and reflective impacts arising from the interaction between existing wind turbines and the proposed solar panels. At the public consultation event, the developer confirmed that no assessment of this issue had been undertaken and that no established methodology was available to do so. Later responses to questions raised have been and continue to be inadequate with a failure to directly address the questions asked, failure to provide relevant data and monitoring information, or to address possible mitigation.

In the absence of assessment, evidence, or mitigation, the Parish Council considers that land parcels affected by this issue should be removed from the proposal entirely, as this represents the only effective means of avoiding harm.

### **4. Highways, Traffic, and Construction Impacts**

The Parish Council remains concerned that the proposal lacks sufficient detail regarding construction access, internal access routes, traffic volumes, and mitigation measures, particularly in relation to Whitestone 2.

Ulley is served by narrow rural roads that are unsuitable for prolonged construction traffic and have a history of serious road traffic incidents. Some routes are subject to heavy goods vehicle restrictions. There is no site-specific evidence assessing the impacts of increased heavy vehicle movements on road safety, residential amenity, noise, vibration, or the structural integrity of nearby properties.

The Parish Council considers these omissions to be significant and contrary to the requirements for robust highway and amenity assessment.

### **5. Landscape and Visual Impact**

The proposed siting of solar panels on elevated land surrounding the village and adjacent to rural roads would result in substantial and unavoidable visual harm. Development on hillsides fundamentally alters landscape character and cannot be effectively mitigated through screening or planting.

The Parish Council considers the impact along Penny Hill Lane to be particularly harmful and advises that any solar development should be set back significantly further from this route to preserve the rural approach to the village.

### **6. Ecology, Wildlife, and Public Rights of Way**

The Parish Council notes that the area supports a wide range of wildlife, including birds of prey, owls, deer, hares, and diverse flora and fauna. The submitted ecological assessments do not adequately address hunting territories, habitat connectivity, or the functional land needed to sustain these species.

The surrounding network of public footpaths and bridleways is of high recreational and well-being value. The Parish Council considers that the proposal fails to demonstrate how the openness,

views, and rural experience of these routes will be preserved. A substantially greater setback from public rights of way is required.

#### **7. Battery Storage, Substations, and Associated Infrastructure**

There is insufficient certainty regarding the siting of battery storage facilities, substations, and cable corridors. Indicative plans showing battery storage on elevated land near Upper Whiston raise serious concerns regarding visual prominence, noise impact, and proximity to residential properties.

The Parish Council considers the lack of defined locations and impact assessments for this infrastructure to be unacceptable at this stage of the planning process.

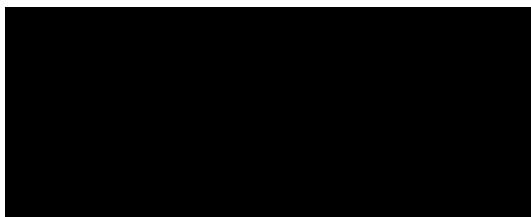
#### **8. Community Impact and Weight of Harm**

The Parish Council notes that the proposed community benefits package does not address the direct impacts on those most affected, including loss of amenity, disruption, and potential impact on property values. While community benefits are not a material planning consideration, the absence of adequate mitigation or compensation reinforces the imbalance between public benefit and local harm.

#### **Conclusion**

For the reasons set out above, the Parish Council considers that the proposed development is unsupported by sufficient evidence, fails to demonstrate acceptability in planning terms, and would result in significant and avoidable harm. The Parish Council therefore requests assurance that the Local Planning Authority is actively seeking the necessary information and clarification from the developer and relevant RMBC officers, and that, where this cannot be provided, these deficiencies are clearly reflected in the Authority's formal response and report to the Secretary of State. The Parish Council also asks that a copy of this response be made available once it is completed.

Yours sincerely,



Parish Clerk & Responsible Financial Officer  
Ulley Parish Council

[clerk@ulley-pc.gov.uk](mailto:clerk@ulley-pc.gov.uk)



**From:** Clerk <[clerk@walesparishcouncil.gov.uk](mailto:clerk@walesparishcouncil.gov.uk)>

**Sent:** 14 May 2026 12:31

**To:** [lisa.brookes@rotherham.gov.uk](mailto:lisa.brookes@rotherham.gov.uk)  
[REDACTED]

**Subject:** Whitestones- adequacy of consultation statement by Wales Parish Council

Dear Lisa

Wales Parish Council would like its adequacy consultation statement to be appended to RMBC's submission as per the email circulated to Parish Clerks.

Given our council calendar does not align with the window given to make the Parish's submission, the response relies on comments previously submitted in a letter to the Consultation Team for the proposed Whitestone Solar Farm in October 2025.

The Parish's comments are as follows:

"The consultation period has not been meaningful; your representatives do not listen to local opinions. The number of drop-in sessions have been inadequate and to add insult to injury there was no consultation in Kiveton for the October sessions. Kiveton has the largest village hall and a large car park available for use. However, your company chose small village halls with no or very little car parking available. This in itself indicates the lack of care your company has for the local community. Your consultations appear to be a tick box exercise only.  
"There has been little communication with Wales Parish Council."

I confirm that:

- it represents Wales Parish Council's final position; and
- The Parish agree for it to be appended to RMBC's submission.

This action was taken in consultation with the Chair of the Council, Cllr Shaw.

Kind regards,

[REDACTED]

Clerk to Wales Parish Council

[REDACTED]

[REDACTED]

Normal working days: Tuesday-Wednesday-Thursday



# WHISTON PARISH COUNCIL

*The Parish Hall  
Well Lane  
Whiston  
S60 4HZ*

**Telephone: 07712 305729**

**Email [clerk@whistonparishcouncil.gov.uk](mailto:clerk@whistonparishcouncil.gov.uk)**

25<sup>th</sup> March 2026

RMBC  
Regeneration & Environment  
Riverside House  
Main Street  
Rotherham  
S60 1AE  
E-mail: [Lisa.Brooks@rotherham.gov.uk](mailto:Lisa.Brooks@rotherham.gov.uk)

Dear Lisa,

We write to record our Parish council's support of your letter 'Whitestone Solar farm – Adequacy of Consultation Milestone (AoCM) to dwd-ltd, published at the RMBC website [Whitestone Solar Farm and nationally significant infrastructure projects – Rotherham Metropolitan Borough Council](#)

Within the Whiston Parish boundary the proposed works comprise areas of solar panels, a significant area of cable installation with their associated construction impacts as well as permanent substations and BESS (Battery Energy Storage System) - all in combination with the new connecting 'Brinsworth' sub-station. We find ourselves in a position of not fully understanding the likely impacts of both the construction operations and permanent features in terms of nuisance (noise, dust, traffic, flooding etc), medium term impacts of reinstatement of farmland and hedgerows and longer term visual impacts and noise implications.

The green space around Whiston is limited, bisected by M1, and under increasing pressure from a significant number of developments. Circular walks, cycling and equestrian routes from Whiston Parish also run through neighbouring parishes. It is extremely important to us that the value of PROW and the visual impact and change of character that the panels will impose must not be under-estimated and our green space must be protected. Not all residents have capability to travel to alternative locations and filling in our local greenspace will have long term impact on both the current and future generations health and wellbeing.

The consultation process to date has not been focussed sufficiently on local issues, in particular we are deeply concerned that the impact of the works within our parish are only just starting to emerge and that the vast majority of our parishioners are unaware of the extent and scope of the works.

Our concerns are broadly addressed by the bullet points within your letter, however we feel it is appropriate to expand as follows. For ease of reference our concerns regarding lack of consultation are detailed below under the relevant headings from your letter.

**a. Consultation process lacked transparency, clarity, and genuine community engagement**

- As detailed further below the number and timing of events was inadequate
- The initial documentation lacked detail of cable routes, hence unlikely to attract the full attention of residents of Whiston who may consider the works to be located in other parishes
- The red line boundary drawings issued with the March 26 targetted consultation is the first time a scale has been put to the width of cable works
- Limits on height and scale of buildings, panels and ancillary equipment remains unclear
- The new 'Brinsworth' substation planning development is on our doorstep. It is claimed the two development applications are not connected but surely a key driver of that scheme is to facilitate the connection point for the solar farm? Why is the sub-station considered separately, or the impacts of the solar farm considered in isolation?

**b. Not all directly affected residents received communication about consultation events.**

The definition of 'directly affected' is unclear – for example there is a potential for noise nuisance in the long term, perhaps from cooling fans within battery energy storage systems and sub-stations. This could affect residents in Whiston and Upper Whiston in particular. We have no information on this issue.

**c. Only a small number of drop-in sessions were held across a very large geographical area, many during working hours, with no formal presentations.**

- To date there has been only one public engagement event within the Whiston Parish, this was held 12pm to 4pm at Whiston Parish Hall, on Wednesday 15<sup>th</sup> October. Only 1 event was held at weekend (in Conisborough, 8 miles away). This contradicts the SOCC statement that events organised at a range of times to ensure people with different schedules are able to attend. It is, for example, unlikely that anyone taking a bus to work would contemplate travelling to an event outside the parish

**d. Consultation events were poorly advertised and offered limited opportunity for meaningful participation.**

- Apparently an introductory newsletter was sent to 30,755 addresses in Autumn 2024, yet in the SoCC 45000 addresses have been identified in the inner zone. How has the consultation been notified to the 15,000 households not included originally. Note we don't recall receiving such a letter to our home addresses in Whiston.
- The proposals at the Autumn 2024 consultation were limited to an outline plan which did not show the proposed cable routes, the scheme has developed

significantly since and unless individuals have maintained an interest through seeking information on-line they will not be aware of the emerging detail.

- It appears that invitations to the statutory consultation in Autumn 2025 were not published by post

**e. Whitestone representatives showed poor local knowledge, dismissive attitudes, and were unable to answer key questions regarding flooding, traffic, biodiversity, and community benefits.**

- One example where local issues have not been understood is flood risk within Whiston. The environmental statement, chapter 10 Water Resources and Flood Risk has no mention of Whiston Brook. This is the primary watercourse through Whiston, classed as a main river to permit YW discharges, and extremely sensitive to flash flooding. The risk of run off during the construction period causing pollution and silting is significant
- The consultation session in Whiston was attended by Parish councillors, in combination with other discussions, at no stage have the local impacts of cable routes been explained. To quote 'we are more concerned about what they haven't told us than what they have'.

**f. After two years of planning, key infrastructure locations (cable corridors, battery storage, substations) remain undetermined and were not clearly presented.**

- The scale, and in particular the width of the corridors for cable installation have only become clear in the most recent publication of documents. We are still reliant on scaling the drawings as dimensions have not been provided, but a boundary up to 200m wide within which the developer can do as they please is not acceptable. What is the actual working width? what gaps will be cut through hedgerows? what are the effects on land drainage? Are trees protected/avoided? how will road crossings be undertaken? - how and when will all this be reinstated?
- There is no visualisation of what BESS and substations at the proposed locations will look like – only typical examples with no dimensions. What heights are proposed, will visual screening be provided?

**g. Technical documentation was extensive, but the consultation period was too short for residents and organisations to review and understand its implications.**

- A very short ( 6 week) consultation period does not allow sufficient time for a volunteer group of non-expert parish councillors to understand and review the details within the many pages of the environmental statement. The documentation has been prepared by a team of full time specialist consultants employed by the applicant to support the case for the works over a period in excess of 12 months. There is no opportunity to employ the same level of expertise to challenge and support the concerns of residents affected.

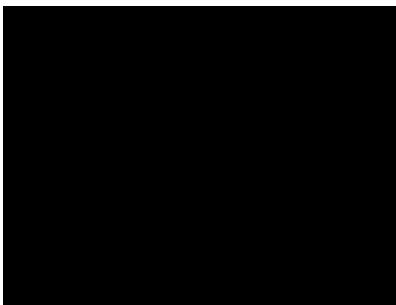
In addition we consider that the documentation upon which the consultation is based is incomplete and in some areas misleading.

1. The draft ES consistently refers to a construction period of 2 years being worst case, yet also suggests 3 years is more likely. What is the construction period and over what period will our villages be subjected to noise, dust, siltation, traffic disruption and so on?
2. What are the proposals for reinstatement of hedgerows, it could be 15 to 20 years for full recovery.
3. What is the proposed cross section of the cable routes? – the indicative sections within the consultation documents show 2 trenches, access road, working area and 2 strips for stockpiling arisings. This indicative drawing infers a width of circa 50m, not the 200m shown on the very latest drawings which define order limits.

We have not yet formally objected to the scheme as the details and implications are only becoming clearer as more detailed information is issued, and as we have taken time to study what has been published. Given that the statutory consultation period is over we anticipate there will be an opportunity to raise and discuss these issues once the full DCO submission is available. We do expect to undertake a review of the proposals and raise our concerns in full when the DCO application is submitted.

Meanwhile we would appreciate if the detailed concerns listed above would be considered during the RMBC development of the Local impact Report.

Yours Sincerely



**Clerk to Whiston Parish Council**

[REDACTED]  
**Sent:** 24 March 2026 14:24

**To:** Lisa Brooks <Lisa.Brooks@rotherham.gov.uk>

**Cc:** Andrew Bramidge <Andrew.Bramidge@rotherham.gov.uk>; [REDACTED]  
[REDACTED]

**Subject:** Subject: STRICTLY CONFIDENTIAL: Evidence of Intentional Concealment and Section 47 Breach – Whitestone Solar Farm (EN0110020)

**Subject: URGENT: Evidence of Intentional Concealment and Section 47 Breach – Whitestone Solar Farm (EN0110020)**

**To:** Lisa Brooks (RMBC)

**From:** Sharon and Christopher Leahy (Springvale Farm / Yew Cottage)

Dear Lisa Brooks,

We are submitting the attached **Heads of Terms (issued 6 March 2026)** and **Map Box 5a** in strict confidence. This evidence proves that the Applicant has intentionally masked the industrial scale of **Cable Route C (Corridor CR 2a)** throughout the statutory consultation process.

While the Applicant has used "survey access" via the residential driveway, these documents prove their long-term intent was always a major East-to-West Industrial Haul Road. This explains the **300m corridor width** previously queried by PINS; it was never for "routing flexibility," but to provide a footprint for an unconsulted industrial staging area and HGV thoroughfare.

### **1. The Deception: "Cable Route" vs. "Industrial Thoroughfare"**

Throughout the public consultation, CR 2a was presented as a "Cable Route."

However, **Section 13c-d and Map Box 5a** prove the true requirement:

- **The Intent:** A "Temporary Hard Core Access Track" for heavy plant and HGVs and a "Temporary Compound" featuring security fencing, floodlighting, and 24/7 generators.
- **The Omission:** By omitting the "Haul Road" and "Compound" designations from public maps, the Applicant avoided mandatory Noise, Vibration, and Dust Assessments for an industrial site situated only **30m from our residence**.

- **The Impact:** This is a blueprint for the total industrialization of our home. If granted, the operational impact on **Springvale Farm** would be catastrophic—a *de facto* closure order for our smallholding and tourism business.
- **2. Economic Sterilisation & 10-Year Blight**

**Section C (Items 4-7)** seeks to "freeze" our livelihood until **2036**. The Applicant is attempting to strip the commercial value of our land while offering a predatory "agricultural" rent of just £0.15 per square metre. For a company burning millions in cash, this is an attempt to use our home as a cheap industrial staging post at the expense of our future.

### **3. "Change 5a" as a Forced Admission**

The recent "Change 5a: Road Safety" notice is a late-stage attempt to retro-fix a failure to consult. By admitting a need for "visibility standards" and "speed limits" now, the Applicant confirms the site was **never suitable** for the heavy HGV use they privately intended. This admission coincides with suspected surveyors being present on Morthen Road on 13 March, as noted in recent correspondence from our neighbor at New Sycamore Farm.

### **4. The "Gagging Clause" (Section 21 a-e)**

This "voluntary" offer is contingent on us **withdrawing all existing representations to PINS** and waiving our right to object. This is a predatory attempt to "cleanse" the public record of the documented **20 February Trespass** and other misconduct before the May DCO submission reaches the examination stage.

### **5. Financial Inadequacy & Insolvency Risk**

The offer is based on a generic agricultural valuation (£12k/acre). The offer ignores the **£6M+ asset value** of the Morthen Lane Cluster. Given the Applicant's negative net worth and high cash burn, the **Funding Statement** for the May submission will be factually inadequate to cover the statutory compensation (Injurious Affection) required. Furthermore, **Section 6** reveals a risk of "permanent abandonment," leaving us with a ruined field and no remediation funds if the developer fails.

### **6. The "31 July" Procedural Sham**

Issuing a voluntary deadline of **31 July** while rushing a DCO submission in **May** confirms the Applicant is bypassing the "Last Resort" requirement for Compulsory Acquisition, in direct breach of **DCLG Guidance**.



**Conclusion**

The Applicant has used the "Cable Corridor" label to bypass the scrutiny that a Major Haul Road would naturally trigger. We request that this evidence informs the **Section 55 Acceptance Test** and the **Adequacy of Consultation Report**. The prior consultation is legally flawed.

Kind regards



## STATEMENT OF FACT: Dean Baker (Morthen House)

**Subject:** Technical Mapping Failure and Unauthorized Survey Attempt (EN0110020)

### 1. Land Interest & Residential Status:

I, [REDACTED]

[REDACTED]. My property is situated within the proposed **Order Limits** for the Whitestone Solar Farm (**CR2a Cable Corridor**).

### 2. Procedural Irregularity of Section 172 Notice:

While I have received Section 42 consultation documents, I have **not** signed for or formally accepted any statutory notice of entry. Despite this, the Applicant (Whitestone Net Zero Ltd) issued a **Section 172 Notice** dated 30 January 2026.

- **The Mapping Fiction:** The map provided with this notice identifies a "**Red Line**" **access route** originating from Morthen Lane and crossing a **private concrete bridge** directly into my residential garden.
- **Structural Risk:** This bridge is a private residential feature, not designed for industrial survey vehicles or heavy plant machinery. The Applicant has conducted no structural assessment or safety briefing regarding this crossing.

### 3. Attempted Entry & Abandonment (19 February 2026):

On 19 February 2026, agents of the Applicant attempted to access my property.

- **Contractor Admission:** On 20 February, the Applicant's surveyor, [REDACTED], explicitly admitted to my neighbor, [REDACTED], that he had **abandoned the survey at Morthen House** the previous day.
- **Procedural Failure:** This abandonment proves that the Applicant's "desktop-mapped" access strategy is technically unworkable. They are attempting to force entry via private gardens because they have failed to secure viable agricultural access.

### 4. Material Breach of Privacy (Article 8):

The Applicant's insistence on mapping a private garden and a residential bridge as an industrial corridor—without a validly served notice or structural survey—represents a disproportionate interference with my **Right to Respect for Private Life and the Home**.

### Conclusion:

The "Morthen House Failure" on 19 February demonstrates that the Applicant's survey plan is a fiction. I request that **RMBC** marks this consultation as **INADEQUATE** due to these systemic mapping and safety failures.

**Signed:** \_\_\_\_\_ **Date:** \_\_\_\_\_

## STATEMENT OF FACT:

**Martin Pashley**

**(New Sycamore Farm)**

**Subject:** Failure of Statutory Consultation and Diligent Inquiry (EN0110020)

### 1. Land Interest & Residential Status:

I,

[REDACTED]  
[REDACTED]  
[REDACTED]

, Morthen Road. I am a second-generation agricultural tenant on the surrounding fields. Over a decade ago, I purchased 2.5 acres of land from the landowner, **Warde-Aldam**, and was successfully granted planning permission by **Rotherham Metropolitan Borough Council (RMBC)** to construct a permanent agricultural dwelling within the Green Belt. This house is my primary residence.

### 2. Business Operations:

I have operated a livery stable and agricultural business on this site for several decades. The remainder of the paddocks associated with my business are leased from Wardolden, with **Savills** acting as the managing agents. My livery business involves the care of livestock and the daily presence of sub-tenants (stable renters) and members of the public.

### 3. Total Failure of Consultation:

Despite the proposed **CR2a Cable Corridor** potentially bisecting my active paddocks with a 300-metre wide construction zone, I have received **zero correspondence** from the Applicant (Whitestone Net Zero Ltd) or their agents (Ardent).

1. I have not been served a **Section 42 Statutory Consultation** notice.
2. I have not been served a **Section 172 Notice of Entry**.
3. My business and residential dwelling appear to have been entirely omitted from the Applicant's **Book of Reference**.

### 4. Incident of Unauthorised Scouting:

On [Insert Date], suspected agents of the Applicant entered my private yard without notice. Bypassing my residence (located 20m from the yard), they approached my sub-tenants and requested they 'bring in the horses' to facilitate a survey. This unauthorised interference with livestock, conducted without a safety briefing or statutory notice, represents a **grave risk to animal welfare** and a material breach of professional conduct.

**Conclusion:**

The Applicant has failed the legal test of '**diligent inquiry**' by ignoring a highly visible, long-standing residential and commercial interest. I request that RMBC marks this consultation as **INADEQUATE**.

**Signed:** [REDACTED]**Date:** 08/03/2026\_\_\_\_\_

Sent from my iPhone

Dear Lisa Brooks, please see the following in regards to adequacy of consultation. Sorry I sent this to the wrong address previously.

## **STATEMENT OF FACT: Susan Patching (Springvale House)**

**Subject:** Inconsistency of Statutory Process and Failed Consultation (EN0110020)

### **1. Land Interest & Residential Status:**

[REDACTED]

Morthen Lane, for several decades. My property includes two agricultural fields situated within the proposed **Order Limits** for the Whitestone Solar Farm (specifically the **CR2a Cable Corridor**). These fields are identical in nature and location to those owned by my neighbour, Sharon Leahy.

### **2. Record of Correspondence:**

Until recently, I received identical correspondence from the Applicant (Whitestone Net Zero Ltd) and their agents (Ardent) as my neighbours at Springvale Farm. This included the **Section 42 Statutory Consultation** documents and a final request in January 2026 to sign a **Voluntary Licence Agreement**. I have not signed this agreement, nor have I engaged in any voluntary discussions with the Applicant to date.

### **3. Omission of Section 172 Notice:**

Despite my land being identical to the neighbouring parcel [REDACTED], which was served a formal **Section 172 Notice of Entry** on 30 January 2026, I have **not** been served with any such notice.

- The Applicant appears to be exercising statutory powers **selectively**.
- Because my fields do not have direct driveway access and rely on an informal gate to the neighbouring Parkes' land, it appears the Applicant has bypassed my legal interest in favour of "easier" residential targets.

### **4. Procedural Failure & Mapping Inconsistency:**

The failure to serve a Section 172 notice on my land while targeting the identical adjacent plot proves that the Applicant's survey strategy is fragmented and technically unsound. If the Applicant intends to "punch through" this corridor, they have a **statutory duty** to consult and notice all affected owners equally.

### **Conclusion:**

The Applicant's "pick-and-choose" approach to statutory notices is a misuse of the DCO process. I support my neighbours' request that **RMBC** marks this consultation as **INADEQUATE** due to the inconsistent and unprofessional handling of residential land interests.

**Signed:** \_\_\_\_\_

\_\_\_\_\_ **Date:** \_08/03/2026\_

Sent from my iPhone