

Relevant Representations to the Whitestone Solar Farm Development Consent Order

Application: EN0110020

On behalf of:

Rotherham Metropolitan Borough Council



Prepared for: RMBC

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Prepared by: CC/JB

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Whitestone Solar Farm DCO Relevant Representations
Rotherham Metropolitan Borough Council

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1 Introduction

1.1 Context

- 1.1.1 These Relevant Representations have been prepared by Stantec, on behalf of Rotherham Metropolitan Borough Council (“the Council”). The Council is an interested party for the purposes of the examination of the Whitestone Solar Development Consent Order (DCO) application by virtue of being a local authority in whose area the land to which the application relates is located, as set out in section 102(1)(c) of the Planning Act 2008 (“the 2008 Act”). The Council has been given notice by Whitestone Solar Ltd of a deadline for receipt by the Secretary of State of representations giving notice of our interest in, or objection to the application. The Council is therefore pleased to provide its relevant representation.
- 1.1.2 The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 (as amended) (“the 2015 regulations”) provide that relevant representations must include ‘the principal submissions, and where practicable, the full particulars of the case which the person proposes to make in respect of the application’.
- 1.1.3 This relevant representation sets out an overview of the Council’s opinion on the application identifying key issues and recommendations. The Council’s overall position with regard to Whitestone Solar is that it objects to the Proposed Development and application as currently drafted due to strategic concerns relating to the loss of high-quality agricultural land and Green Belt together with the cumulative impact of the project on Rotherham’s environment, local communities and businesses as well as the requirement for further assessment and evidence to support the proposed development.
- 1.1.4 The Council will nevertheless continue to work constructively with the applicant on the detail of the proposals to minimise impacts and maximise benefits where possible.

1.2 Structure of the report

- 1.2.1 The remainder of this report comprises the following chapters:
- Section 2 – Background and Context
 - Section 3 - Impacts of the Proposed Project – Strategic Comments
 - Section 4 – Impacts of the Proposed Project - Key Concerns
 - Section 5 – Development Consent Order
 - Section 6 – Conclusions



2 Background and Context

- 2.1.1 Stantec have been appointed by The Council together with The City of Doncaster Council as one of the other Host Authorities to act on their behalf through the Development Consent Order application of Whitestone Solar Farm Application: EN0110020. These representations are only the opinion of the Council and The City of Doncaster Council Relevant Representations are set out separately, however much of the content is similar due to the nature of how the application has been written and submitted therefore many comments apply to both host authorities.

Project Overview and Context

- 2.1.2 The 'proposed development' comprises the construction, operation and maintenance, and decommissioning of solar photovoltaic (PV) arrays with a generating capacity of up to 750MW, Battery Energy Storage System (BESS), onsite substations and supporting infrastructure, and grid connection infrastructure cable corridors to the new National Grid Long Lane 400kV Substation. The proposed development also includes for landscaping and habitat enhancements and is applied for an operational period of 60 years.
- 2.1.3 The construction of the development is anticipated to approximately 24-36 months and decommissioning would take place after the 60 year operational period.
- 2.1.4 The proposed development is split across three main areas over four administrative boundaries of the City of Doncaster Council (CDC), Rotherham Metropolitan Borough Council (RMBC), North East Derbyshire District Council (NEDDC) and Derbyshire District Council (DCC). The Order Limits comprise a total area of approximately 1,488 hectares (ha), consisting of approximately 339ha proposed for the 18 Cable Corridors, and 1,149ha proposed for the Site.
- 2.1.5 The three main areas of the Order Limits are defined in the application as:
- Whitestone 1 (W1), located south of Conisbrough (centred on National Grid Reference (NGR) SK 503962) – 327 ha of agricultural land.
 - Whitestone 2 (W2), located between Treeton in the west and Dinnington in the east (centred on NGR SK 477874)- 651 ha of predominantly agricultural land
 - Whitestone 3 (W3), located south of Wales and Kiveton Park (centred on NGR SK 481807) – 172 ha agricultural land
- 2.1.6 The Councils administrative area is mainly located in Whitestone 2 and 3 with a small portion in Whitestone 1.



Councils Position Overview

- 2.1.7 The Council recognises the essential need to generate renewable energy to meet national target and that the proposed development would contribute towards meeting the UK's commitment to achieve net zero carbon emissions by 2050 and the Government's Clean Energy target of 2030. The Council is therefore not wholly against renewable energy schemes in principle which is demonstrated by the consent of TCPA planning applications in the borough. However, in determining this application, the Examining Authority must apply the statutory test under section 104 Planning Act 2008, having regard to the relevant National Policy Statements, including the need to assess whether the identified benefits of the proposal outweigh its adverse impacts. The relevant policy framework for this application comprises the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable Energy Infrastructure (EN-3), together with EN-5 in respect of associated network infrastructure (where relevant).
- 2.1.8 In this context, the Council has identified significant harm arising from the development, including impacts on heritage, the Green Belt, wider landscape, ecology and amenity. The Council considers these impacts significant and expects them to be given appropriate weight in the section 104 planning balance, alongside the national need case. This representation therefore addresses both the nature and extent of those impacts together with the need for the Development Consent Order ("DCO") to include robust, precise and enforceable provisions. The Council has engaged, and will continue to engage, constructively with the applicant, on detailed drafting of the DCO and as highlighted later in this representation, will reserve the right to comment further on the draft wording through the examination period.
- 2.1.9 The Council wishes to make a relevant representation regarding the proposed DCO as whilst they recognise the essential need to generate renewable energy to meet national targets, the Council objects to the project and application as drafted and continues to raise concerns about the specific harms the development will cause which are set out below.
- a. **Landscape and Visual Effects:** Introduction of solar panel equipment, BESS infrastructure, and multiple substations into sensitive rural landscapes, causing permanent change to character and views.
 - b. **Loss of Green Belt:** the Introduction of development between towns and urban areas which would harm the contribution the green belt currently has on restricting urban sprawl and preventing towns from merging.
 - c. **Heritage Impact:** Adverse effects on the setting of multiple designated heritage assets which need further detailed assessment to assess the harm on each individually.
 - d. **Ecological Impact:** Loss and fragmentation of habitats including loss of hedgerows and trees, with potential impacts on protected species and biodiversity.
 - e. **Agricultural Land Loss:** Permanent and temporary loss of productive farmland.



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- f. **Residential Amenity/Public Health:** Noise, air quality, visual intrusion and disruption during construction and operation especially in light of cumulative impacts.

- 2.1.10 The harms identified in the application documents are notable. They must be given very significant weight in the planning balance and the DCO must include robust controls to ensure these harms are not compounded by inadequate drafting.
- 2.1.11 This Relevant Representation sets out the Council's principal concerns regarding the proposed development as drafted and requests clarification, further evidence and recommendations to inform the application and examination process. Further supporting evidence and detail will be provided in the Local Impact Report at the Examination stage.



3 Impacts of the Proposed Project – Strategic Comments

3.1.1 As highlighted above, the Council notes the governments need for renewable energy but has some key concerns over the proposed development and issues with the application as currently drafted for the proposed Whitestone Solar Farm which would be located on 1,488 ha of Green Belt extending across Rotherham. The key strategic concerns with the application are summarised below:

3.2 Environmental Statement Methodology

3.2.1 Following a review of the application submission documents and the Environmental Statement included, there are various methodology and referencing issues across numerous chapters of an Environmental Statement, affecting clarity and confidence in the assessment. Firstly, the Council would like to see these matters addressed to ensure a robust Environment Statement (ES) is provided. The key concerns are summarised below and set out in detail underneath with recommendations.

- Inconsistent ES volume references, unclear and inconsistent application of professional judgement, and insufficient evidence on decommissioning effects.
- Specific chapters require improved explanation on site selection, alternatives, design evolution, and worst-case scenarios, with missing or inconsistent figure references noted.
- The cumulative effects assessment and non-technical summary need updates to reflect corrections and ensure clarity for all readers.

3.2.2 The Table below sets out the detail of where improvements in the ES are recommended:

Chapter 1 Introduction APP-053

Chapter REF APP-053	Para ref	Comment
Introduction		
Schedule 2	1.3.3	Para 1.3.3 concludes that the project is Schedule 2 development because it constitutes "<i>industrial installations of electricity, steam, and hot water</i>" and is likely to have significant effects due to its nature, size, and location. Whilst we do not challenge the need for EIA on a 100+ MW solar NSIP, but this section is lacking in the following detail: - scale of development - inclusion of BESS - extensive cable corridors - sensitivity of receiving environment - why significant effects cannot be excluded



Limited explanation of assessment limitations		Compliance table states that forecasting methods, limitations, and uncertainties are addressed elsewhere. However, Chapter 1 contains no overarching statement that there are no significant data gaps, and that uncertainties have been addressed using professional judgement and accepted methodologies. We seek reassurance that the ES hasn't been prepared with material information gaps and this should be clarified.
Referencing of ES	Various	Throughout the chapter the ES is referenced as Volume 1-3, however Para 1.5.1 sets out the ES as Volume 6 Parts 1-3. All referencing should be updated and corrected throughout. This also applies to Appendix 1.1.

Chapter 2 EIA Methodology REF APP-054

Chapter REF APP-054	Para ref	Comment
2 EIA Methodology		
Referencing of ES	Various	Throughout the chapter the ES is referenced as Volume 1-3, however Chapter 1, Para 1.5.1 sets out the ES as Volume 6 Parts 1-3. All referencing should be updated and corrected throughout. This also applies to Appendix 2.3.
Professional judgement		Professional judgement has been used where formal methodologies do not exist, specifically the landscape and cultural heritage chapters, but Chapter 2 doesn't explain how professional judgement has been applied, documented and quality assured. The degree to which professional judgement may override the significance matrix outcomes is not clearly defined potentially resulting in inconsistency between technical chapters. This should be refined and clarified.
Decommissioning assessment		Assumption that decommissioning effects won't be greater than construction effects are not fully evidenced and might underestimate future impacts given evolving environmental conditions and land uses over the 60 year operational lifespan. Further evidence is required.
Effect interactions		The methodology for assessing interaction effects is not presented in sufficient detail within the chapter, making it difficult to determine how combined impacts on receptors have been evaluated.
Referencing	2.5.46 2.5.24	Unresolved cross referencing errors creating uncertainty regarding supporting evidence relied on for methodology. Should be corrected to ensure clarity/transparency.
Consultation response tracking		Chapter 2 states that responses have been addressed across technical chapters but doesn't provide a trail showing issues raised, chapters affected, changes made, and any residual disagreements. We would request a more transparent tracking mechanism in this section to ensure matters have been addressed and resolved.



Chapter 3 The Site and Surrounding Area REF APP-055

Chapter REF APP-055	Para ref	Comment
3 The Site and Surrounding Area		
Referencing of ES		Again throughout the chapter the ES is referenced as Volume 1-3, however Chapter 1, Para 1.5.1 sets out the ES as Volume 6 Parts 1-3. All referencing should be checked and corrected throughout.
	3.4.4, 3.4.12, 3.4.21, 3.5.7, 3.5.15, 3.5.23, 3.5.29, 3.5.33, 3.5.49, 3.5.53, 3.5.57, 3.5.65, 3.5.71, 3.5.74	Incorrect reference to Figure 15.7 and incorrect title used, needs updating for clarity.
Figure 8.11	3.4.5, 3.4.14, 3.4.22, 3.5.35, 3.5.38, 3.5.41	Figure 8.11 is not listed on contents page of APP-077.
Fig 8.2	3.4.6	Figure 8.2 title does not align to Figure 8.2 presented within APP-077. Update requested.
Kearsley Brook	3.4.9	Surface watercourses are shown on Figure 10.3 not 10.2. Kearsley Brook is not labelled on Fig 10.3 so it is not clear where it travels to and from. A watercourse is shown north/south through W1 on Fig 10.3 but appears to turn east along the northern boundary not west (the boundary does not extend west at this location)? Kearsley Brook is labelled on Fig 10.2, however it does not appear to be within the order limits of W1. Information provided is very confusing. Incorrect reference to Figure 10.6 provided. Clarifications for consistency are required.
Fig 8.5	3.4.15	Figure 8.5 is not provided on PINS website APP-077.
	3.4.18	Unable to identify 3 branches of Ulley Brook on Fig 10.2. Incorrect title for Fig 10.2 provided in para. Fig 10.3 has no labels for River Rother or Ulley Brook. Kingsforth Brook is not labelled on Fig 10.2 and none are labelled on Fig 10.3. Incorrect reference to Figure 10.6 provided.
	3.4.23	Figure 8.8 is not provided on PINS website APP-077
	3.4.26	Harthill Reservoir is not shown on Figure 10.2 but is shown on Fig 10.3. Incorrect title for Fig 10.2 provided in para. Incorrect reference to Figure 10.6 provided.
	3.5.6	The scale of Figure 3.4 makes it difficult to identify some smaller sites. No labelling is provided.
	3.5.19	Pinch Mill Brook is not labelled on either Figure 10.2 or Fig 10.3
	3.5.36	Whinston Brook is not labelled on Fig 10.2 or Fig 10.3



Chapter 4 Alternatives and Design Evolution REF APP-056

Chapter REF APP-056	Para ref	Comment
4 Alternatives and Design Evolution		
Search area	4.6.8	While the chapter explains that a 12 km search area was adopted, it is not entirely clear why this distance was selected over other alternatives. The chosen search area appears to have been influenced largely by commercial and technical considerations, with limited evidence of any comparative environmental appraisal of different search extents. More clarification would be beneficial here.
Reliance on willingness of landowners	4.6.15	Land parcels were discounted where landowners were unwilling to participate in the scheme. Whilst this is clearly an important delivery consideration, landowner willingness is not, in itself, an environmental constraint. The chapter doesn't clearly separate environmental reasons for ruling out alternatives from commercial or deliverability factors, making it difficult to understand whether any environmentally preferable options may have been excluded at an early stage. Clarification and further detail is needed.
Green belt	4.6.10	Given that substantial areas of the project are located within the green belt, an additional explanation could be helpful on how green belt considerations influenced site selection. It isn't clear whether alternative locations were explored that may have reduced impacts on openness or better avoided conflict with green belt purposes.
Alternative technologies	Section 4.5	It states that wind generation would likely result in greater environmental impacts than the project but provides little comparative evidence to support this. Of course, such alternative technologies need not be assessed to the same level of detail as the chosen one, but an additional explanation might assist in understanding how alternative technologies were evaluated/discounted.
Brownfield land assessment	4.6.13	Previously developed land was considered but again limited info provided regarding the assessment undertaken. Doesn't identify sites reviewed, methodology used, or reasons for discounting.
design evolution	4.7	Documents design evolution and responsiveness to consultation/env constraints, but limited information on the environmental benefits secured through these changes and does not (generally) quantify the extent to which impacts have been reduced through design refinement
Cable routes	4.6.17	Multiple cable routes options on the table. Recognising flexibility, it doesn't seem to consistently explain the environmental trade-offs between the alternative routes or demonstrate why each option remains acceptable from an environmental perspective. Further detail on this matter is requested.

Chapter 5 The Proposed Development REF APP-057

Chapter REF APP-057	Para ref	Comment
5 The Proposed Development		
supporting document 7.3 Outline Design Parameters	Table 2.1	Incorrect Reference to Figure 5.3 The Proposed Development (6.8). Figure 5.3 is not included in Figures for Chapter 5. Figure 5.2 (6.19) is 'Penny Hill wind Farm Height Restriction Area'



Chapter 5	general	Check all referencing to Document numbers and titles. There are incorrect references to Figures at 6.20. All ES chapter figures are located at 6.19. ES Appendices are located at 6.20.
	5.3.3	PRoW are not mentioned in 7.3 Outline Design Parameters.
Rochdale envelope/design flexibility		Does not clearly demonstrate whether the environmental assessment is based on a single coherent worst-case scenario or a series of topic-specific worst cases. Clarification is requested.
BESS safety		Further clarification would be beneficial regarding the assumptions that underpin the assessment of BESS-related impacts and whether these assumptions remain robust across all potential battery technologies

Chapter 17 Cumulative Effects Assessment REF APP-069

Chapter REF APP-069	Para ref	Comment
17 Cumulative Effects Assessment		
Chapter	17.4.23	It would be helpful to the reader to have a short list of developments set out and the list of topics for each where they fall within each topic Zone of Influence. As it is set out, the reader needs to navigate every chapter of the ES to each topic assessment.
	17.7.2	This paragraph sets out that the inter-project effects were considered in each individual chapter of the ES. It would be helpful to include a summary sentence here to confirm that no significant cumulative effects were identified.

Chapter 18 Summary of Significant Effects Ref APP-070

- 3.2.3 The summary must be refreshed wherever corrections or omissions in the technical chapters change assessment outcomes. For completeness Chapter 17 Cumulative Effects Assessment should be added to each summary table 18.1 and 18.2.

Non-Technical Summary REF APP-155

- 3.2.4 Several abbreviations are not expanded on first use (Paragraphs: 2.3.5, 2.3.6, 2.3.17) which may confuse readers. Paragraph 3.4.2 does not clearly explain whether brownfield sites were considered or why urban areas were unsuitable. Any corrections to assessment outcomes in the technical chapters also need to flow through to the NTS.
- 3.2.5 Many of the points above are requested for clarification and completeness to ensure the ES is methodology is sound.

3.3 Cumulative Impacts

- 3.3.1 The Council notes a concentration of large-scale proposals and consents within the Whitestone 2 and 3 areas particularly. These schemes are a mix of applications including large scale housing,



infrastructure and renewable energy proposals which must be considered in terms of their cumulative and in-combination effects as required by the EIA Regulations and the Planning Act 2008. The long list of cumulative schemes at application document: *6.20 Appendix 17.2: Long List of Developments for Cumulative Effects Assessment* include 32 schemes in Rotherham boundary which could have cumulative impacts. Many of these applications are still pending and will be subject to determination through the examination period. There are limited details on construction timescales and mitigation on the majority of these applications therefore there is concerns over the cumulative impact on the borough moving forward.

3.3.2 The Council is concerned that the cumulative and in combination effects of these Projects, together with existing infrastructure, will result in:

- Landscape and Heritage Harm arising from the introduction of industrial-scale infrastructure incompatible with rural character;
- Ecological Impact as a result of potential loss and fragmentation of habitats and effects on biodiversity; and
- Community Disruption due to noise, disturbance and disruption during construction and operation phases.

3.3.3 The overlapping construction programmes, which will extend over a number of years, will exacerbate these cumulative and in-combination effects including movement of abnormal loads requiring road closures, road widening and associated loss of hedgerows and trees.

3.3.4 The Council therefore recommends the requirement of comprehensive mitigation measures to address landscape, heritage, ecological and community impacts including those arising from cumulative and in-combination effects. The Council also recommends measures to ensure that construction phasing and traffic management plans are coordinated to minimise disruption to residents and businesses, having regard to the interaction between multiple schemes.

3.3.5 The Council acknowledges that there are national benefits with the delivery of these projects. However, these benefits are achieved at the expense of substantial local harm. Given the scale of identified impacts, the Council considers that significant weight should be afforded to heritage, visual, ecological and local amenity harms in the planning balance.

3.4 Green Belt and Grey Belt

3.4.1 In Appendix 2 of the Planning Statement (Document 5.4.1) a Green Belt Assessment is provided. The Council does not agree with the conclusions of the Assessment and does not agree that the whole site should be considered as Grey Belt especially given the lack of evidence provided to demonstrate Grey Belt status. We also believe that a development of this scale and magnitude would have further Very



Special Circumstances to help outweigh the harm of the proposal if considered inappropriate development in the Green Belt.

Reliance on "Grey Belt"

- 3.4.2 The Green Belt Assessment concludes at paragraph 4.7.1 that *"the Proposed Development is located on grey belt land and meets the tests for being not inappropriate within the grey belt."* The Council does not agree with this conclusion.
- 3.4.3 The Planning Balance in the Planning Statement and Green Belt Assessment places a significant reliance on the assertion that the site comprises Grey Belt land and therefore falls within the category of development that may be treated as not inappropriate development. However, the evidence submitted does not robustly demonstrate that the land satisfies the requirements of the NPPF definition of Grey Belt.
- 3.4.4 The Council therefore considers that the evidence provided is insufficient to conclude that the site makes only a limited contribution to Green Belt purposes.
- 3.4.5 To be considered as Grey Belt, inline with the tests of the NPPF (2026), Grey Belt land firstly is *"land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2."*
- Purpose a is to: Check the unrestricted sprawl of large built-up areas;
 - Purpose b. is to: Prevent neighbouring towns merging into one another;
 - And Purpose d. is to: Preserve the setting and special character of historic towns.
- 3.4.6 The Council does not agree that there are no historic towns adjacent to the application site boundary and order limits. Conisborough in the Doncaster administrative area is considered a historic town and while the Council will let Doncaster comment on this matter, it is not considered that the land does not contribute to Purpose d. Furthermore, the Council does not agree with the Applicants position that the land does not contribute to the checking of unrestricted sprawl of large built-up areas; or does it help Prevent neighbouring towns merging into one another.
- 3.4.7 The Order Limits comprise a total area of approximately 1,488 hectares (ha), consisting of approximately 339ha proposed for Cable Corridors, and 1,149ha proposed for the Site. At their maximum extent, the Order Limits extend approximately 18.5km in a north-south direction, and approximately 8km in an east-west direction. This includes land between the following towns and built up areas as confirmed by the Applicant:
- Conisbrough;
 - Brinsworth (Rotherham Urban Area);



- Whiston (Rotherham Urban Area);
- Bramley, Wickersley and Ravenfield Common (grouped); and
- Dinnington, Anston and Laughton Common (grouped).

3.4.8 The Order Limits includes the whole red line which abuts the boundary of the towns and urban areas above. It is the whole red line which needs to be assessed and considered in the Green Belt Assessment, not just the Proposed Development. The Order Limits are vast, and it is considered by the Council that the land within the Order Limits Boundary do in various places contribute to the prevention of towns merging and the restriction of urban sprawl. Therefore, the land should not be considered as Grey Belt in line with the initial NPPF tests.

3.4.9 If the land is however considered as Grey Belt, the Council accepts there is an identified need for the development but reserves it right to comment on the impact of the purposes of the Green Belt as a whole if the Examining Authority determines the Order Limits to be considered as Grey Belt.

3.4.10 In conclusion, the Council do not consider the whole application site to be classified as Grey Belt and the scheme should therefore be considered as inappropriate development and very special circumstances should be demonstrated to outweigh the harm to enable the Examining Authority to find it appropriate development in the Green Belt.

Harm to Green Belt Openness

3.4.11 The NPPF requires consideration of both the spatial and visual dimensions of Green Belt openness.

3.4.12 Whilst the Proposed Development mainly involves structures of relatively limited height, the Proposed Development comprises a significant industrialisation of the countryside through the introduction of:

- i extensive solar arrays;
- ii inverters and transformers;
- iii power conversion stations;
- iv battery energy storage infrastructure;
- v substations and associated electrical equipment;
- vi security fencing and surveillance equipment; and
- vii compounds and internal access tracks and operational infrastructure.

3.4.13 The scale of development proposed across a very extensive area would fundamentally alter the perception, character and openness of the Green Belt.



3.4.14 The Applicant's own evidence identifies significant residual landscape and visual effects. It is therefore difficult to reconcile these findings with the conclusion that Green Belt openness would experience only limited harm.

3.4.15 Consequently, substantial weight should be given to the resulting harm to Green Belt openness.

Conflict with the Purposes of the Green Belt

3.4.16 The Council is not satisfied that the Applicant has appropriately assessed the contribution of the site to Green Belt purposes on a parcel-by-parcel basis.

3.4.17 The application site performs an important function in maintaining openness between settlements including, but not limited to, Conisbrough, Wickersley, Clifton, Harthill, Woodall, Ulley and Kiverton. The retention of intervening open land is an important characteristic of the area and contributes directly to the Green Belt purpose of preventing neighbouring towns and villages from merging into one another and restricting sprawl from the urban area as highlighted above in the Grey Belt comments.

3.4.18 The Council considers that the submitted assessment understates the contribution made by the site to these strategic Green Belt objectives.

Very Special Circumstances

3.4.19 Should the Examining Authority conclude that the application site is not Grey Belt, the Proposed Development would be inappropriate development and inline with Policy GB6 of the NPPF:

"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Such circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposed development, is clearly outweighed by other considerations. In making this assessment, substantial weight should be given to the harm to the Green Belt which would be caused, including harm to its openness. 61 3. In the case of proposals for renewable and low carbon energy development, very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources."

3.4.20 The Applicant argues that the development's contribution to renewable energy generation and its status as nationally significant infrastructure amount to Very Special Circumstances together with BNG enhancements, Economic/Education Benefits (with limited information) and a Community Benefit Fund which is not considered within the planning balance.

3.4.21 However, whilst we note the national demand for renewable energy, for a site and development of this scale, the existence of national energy policy support does not automatically outweigh the harm.

3.4.22 The NPPF requires decision-makers to undertake a balancing exercise that considers:



- harm arising from inappropriateness;
- harm to openness;
- conflict with Green Belt purposes; and
- any other harm arising from the development.

3.4.23 The Council is not satisfied that the Applicant has demonstrated that these harms are clearly outweighed by other considerations.

3.4.24 The NPPF requires all other forms of harm to be included within the Very Special Circumstances balance. The application documents acknowledge residual adverse impacts including:

- significant landscape and visual effects;
- impacts on the rural character of the area;
- heritage impacts identified as less than substantial harm; and
- the loss of Best and Most Versatile agricultural land.

3.4.25 The Council is concerned that the Planning Statement treats these harms separately from the Green Belt balance rather than demonstrating how they have been comprehensively weighed within the Very Special Circumstances case and limited evidence has been provided.

3.4.26 Accordingly, the Applicant has failed to demonstrate that all identified harms, taken collectively, are clearly outweighed by the benefits of the scheme and the Council seek further updates and evidence on this matter.

Green Belt Conclusion

3.4.27 For the reasons set out above, the Council considers that the Applicant has failed to demonstrate that the site constitutes Green Belt land. Further evidence and assessment should be undertaken parcel by parcel to fully understand the impact on the purposes of the Green Belt.

3.4.28 The Proposed Development would cause significant harm to Green Belt openness and would conflict with the purposes of including land within the Green Belt.

3.4.29 We do not consider Very Special Circumstances have been fully established to a point where they would outweigh the cumulative harm arising from Green Belt, landscape, heritage and agricultural land impacts.

3.4.30 The Proposal is therefore contrary to the Green Belt objectives and policies of the National Planning Policy Framework.



- 3.4.31 We would recommend further evidence based work looking to the purpose of Green Belt in each parcel of the development together with openness. We still do not consider this would qualify the site as Grey Belt but it could help further inform the design and mitigation strategy in the Development Order Limits. Furthermore, we would urge the applicant to explore further very special circumstances to outweigh the harm and we reserve our right to comment on the balance of the harms and benefits through the examination.

3.5 Other matters

- 3.5.1 Key matters raised at the PIER stage include the unknown parameters regarding the BESS, Substations and other infrastructure associated with the Proposed Development given the Development Order Limits are broad and widespread.
- 3.5.2 The Council have concerns over the large areas highlighted for BESS and Substations in prominent areas such as Substation and BESS 2A located on sloping topography with significant views from the north. The size and requirement are still unknown for the BESS but include units of up to 13m long by 5m wide by 3.5m high but the number of units are not known until detailed design stage so the impacts of these units cannot be rationalised at this stage. The BESS units also include ancillary buildings which combined would be a maximum of 40m length by 40m width, with a maximum height of 8m AGL. This is significant development and the Council is concerned over the locations chosen based on their impact on the landscape and visual impact but also the openness of the Green Belt.
- 3.5.3 Likewise for the Substation proposed at location 2A particularly. The parameters include for a substation of 170m by 100m, and a maximum height of 13.5m AGL. Whilst essential infrastructure, the location and prominence in location 2A does not seem appropriate given the significant effects.
- 3.5.4 Another component which the Councils have concerns over is the Power Conversion Stations which are required throughout the Proposed Development but are not highlighted on the Development Order Limit Plans. These structures are up to of 13m long by 3m wide with a maximum height of 3.5m. These are substantial structures in the open countryside and Green Belt and our concerns are there will be a number of these structures across the Proposed Development with limited information on location at present. These will be viewed above the PV arrays and therefore the impact on the openness of the Green Belt and visual impacts across all three parcels of the development.

3.6 NPPF Referencing

- 3.6.1 Throughout the Planning Statement and other application documents there are various references to the draft 2025 NPPF which are now out of date. Given the 2025 NPPF was draft, the Council would not give any weight to the references to it and would request an update be circulated especially given the amendments referenced in the 2025 NPPF have not been adopted in the 2026 version.



4 Impacts of the Proposed Project

- 4.1.1 Whitestone Solar Farm will have a range of impacts across various technical matters. This section sets out the view of the Council on the environmental impacts for each technical matter together with clarification requests, recommendations and general comments.

4.2 Ecology

- 4.2.1 Below sets out an overview of our principal comments relating to *Chapter 6: Biodiversity and Nature Conservation* and supporting technical appendices. Where relevant paragraphs numbers are referred to. However, there is a formatting error after Para 6.4.58. with the next paragraph numbered 6.4.1.
- 4.2.2 A review of the oCEMP and oLEMP has also been undertaken where this is specifically referred to in the ES. Below sets out our comments and recommendations.

Designated Sites

- 4.2.3 Kings Pond Plantation LWS is shown as being surrounded on its northern, southern and western boundary by the order limits (drawing reference EN00110020/APP/2.6), with Solar Panel installed, surrounding the LWS. In Table 6.9 and 6.11 of the ES, the LWS is stated as being adjacent to W2. No further consideration of the impacts to Kings Pond Plantation LWS is provided within the ES. Given that this LWS is surrounded by the order limits, and supports wet woodland and a pond, an assessment of the impacts on the qualifying features of the LWS should be undertaken. The omission of this undermines the current conclusions of the ES.

Protected Species Surveys

- 4.2.4 At the scoping stage Natural England requested that the area affected by development should be thoroughly surveyed and that surveys should always be carried out in the optimal survey time periods and to current guidance. This request from Natural England does not seem to have been followed through. A number of surveys are stated as being in the process of completion, Table 6-6, Paragraph 6.4.10, 6.4.12. Paragraph 6.4.13 states that a commitment to complete surveys is effectively embedded mitigation.
- 4.2.5 There are significant shortfalls with the survey work completed such that it is not considered that there is sufficient baseline information to inform the impacts of the development. In particular the breeding bird survey only included 4 visits out of the required 6¹, no dusk survey was completed as per guidance, survey guidelines also stipulates that all dawn surveys should be begin half an hour either side of sunrise, 24 survey dates were recorded with only 13 of those starting within 30 minutes of sunrise. Additionally, surveys on the 29th May were started late to avoid heavy rain, however surveys began almost two and half hours after sunrise and the rain was still persisting when the surveys

¹ <https://birdsurveyguidelines.org/methods/survey-method/>



began. Furthermore, the wind speed was recorded as between 5 and 7 on the Beaufort scale throughout the survey nearing gale force winds.

- 4.2.6 The assessment of impacts can only be completed when all survey work has been completed to the standards required by published guidance in order for the ecological baseline to be established, as per CIEEM guidance². A commitment to complete the required surveys at a later date (Para 6.4.13) should not be included as embedded mitigation.

Spatial Scope

- 4.2.7 The ES acknowledges that the proposals have the potential to result in; *changes to hydrological conditions (ground water levels and surface water run-off and changes in electromagnetic field (EMF)*
- 4.2.8 However, there is no assessment of impacts to ground water, in particular where HDD is proposed. This is of particular relevance to Crab Wood SSSI which supports flushes and which are potentially Groundwater-Dependent Terrestrial Ecosystem as well as wet woodland habitats, including King's Plantation LWS.
- 4.2.9 The spatial scope does not state that sensitive ecological receptors within 200 m of the affected road network will be assessed in relation to potential for air quality impacts³. Within the ES no consideration of the proximity of sensitive ecological receptors within 200 m of the affected road network is provided.

Assumptions

- 4.2.10 The assessment of impacts is reliant on a large number of assumptions (Para 6.4.58- 6.4.14 [assumed formatting issue with numbering]), relating to the loss of the qualifying features of a designated site (Brampton Common LWS), the loss of habitat, design and construction methodology. At this stage of the application, it is not considered appropriate to rely on assumptions, particularly where this relates to the loss of the qualifying features of a designated site (Brampton Common LWS), design or the construction methodology which is required to be implemented to avoid impacts to an important ecological feature (IEF).

Embedded Mitigation

- 4.2.11 The embedded mitigation measures refer to further details being provided within the submitted oCEMP. However, the oCEMP only provides summary information on how construction related impacts are to be avoid or reduced. The ES chapter refers to RAMS being provided for reptiles (Para 6.6.48), but these are not included with the oCEMP, unless they are being provided separately.
- 4.2.12 It is considered that insufficient detail is provided within the oCEMP for it to provide certainty that appropriate measures will be taken to avoid or reduce impacts to the IEF's which have been identified.

² [Guidelines for Ecological Impact Assessment \(EcIA\) | CIEEM](#)

³ [Air pollution and development: advice for local authorities - GOV.UK](#)



On this basis, any conclusions that impacts on IEF's will not be significant based on the proposed embedded construction mitigation measures cannot be substantiated.

- 4.2.13 The oLEMP, whilst more detailed than the oCEMP still lacks details on certain aspects. Key concerns are as follows.
- 4.2.14 Tussock grassland is proposed around the panels however it is also stated that it is to be sheep grazed. Maintenance of tussock grassland alongside sheep grazing is largely incompatible unless grazed at very low densities. No information is presented with the oLEMP on how grazing will be managed to create areas of tussock grassland.
- 4.2.15 100 skylark plots on 50 ha of land outside the order limits is proposed. However, there is no indication of where this land is located or any commitments from adjacent landowners to allow skylark plots to be created.
- 4.2.16 Five barn owl boxes are proposed. However, there is no proposed location plan provided. Barn owl boxes should not be encouraged to nest within 1 km of motorway as per best practice guidance⁴. The majority of the site is located within 1 km of a motorway. A location plan should be provided identifying where the boxes are to be located to ensure that they are not installed too close to the motorway.

BNG habitat creation and enhancement

- 4.2.17 The BNG report or the oLEMP does not take into consideration the South Yorkshire Local Nature Recovery Strategy.
- 4.2.18 There are errors with how the BNG assessment has been completed which are detailed below.

Document	Paragraph	Comment
Appendix 6.2 - UK Habitat Survey	6.2.1	w2a Native Pine Woodlands listed as occupying 0.08ha of land (0.01% of the Site). This is a rare and restricted habitat within the UK. Further evidence is required to support this classification.
Appendix 6.4 - BNG	6.4.25	Habitats within the Cable Corridor were in certain cases assigned to UKHab habitat through desk study and aerial imagery however, it is not clear how Habitat Condition for these habitats was assigned. It states in 6.4.57 that condition assessments within the Cable Corridor was achieved by assigning the highest recorded habitat condition elsewhere within the survey area. Cable Routes more often and not pass through multiple land ownerships where habitat management and land management aren't necessarily the same. Whilst this may artificially inflate the baseline habitat score within the CRC, as stated, it also has the potential to undermine the value of the Cable Corridor habitats.

⁴ https://www.barnowltrust.org.uk/wp-content/uploads/Barn_Owls_and_Major_Roads.pdf



Appendix 6.4 - BNG	6.4.62	Woodland and forest - Native pine woodlands. This is a rare and restricted habitat within the UK. Further evidence is required to support this classification.
Appendix 6.4 - BNG	6.4.88	Arable field margins are proposed to be created alongside field boundaries within fields set out for solar pv. These fields will be modified grassland and no longer be considered arable fields. By their very nature as a priority habitat, arable field margins can only exist under that description when present adjacent to arable fields.

Assessment of effects

- 4.2.19 As previously stated, there are concerns with the robustness of the baseline survey data which has been collected and used to inform the assessment of effects presented in the ES. With regards to the proposed embedded mitigation measures it is not considered that sufficient information has been provided at this stage.
- 4.2.20 For bats, no assessment of the operational effect of the solar panels on foraging and commuting bats is provided.
- 4.2.21 Specific concerns regarding the assessment of effects on the important ecological features (IEF's) which are identified within the ES are provided below.

IEF	Paragraph number	Comment
SSSI's	6.7.2 -6.7.6	SSSI are assessed as one IEF. Given they will have differing qualifying features and potential impact pathways, these should be considered separately. Crabtree Woods SSSI supports wet flushes, yet no consideration of impacts via changes to ground water conditions/ surface drainage is provided. Consideration of impacts to IEFs within 200 m of the affected road network has not been considered. Wording suggests IEFs within a 250 m radius of the Study area have been assessed but this is not the correct approach. See Air pollution and development: advice for local authorities - GOV.UK
Firsby Reservoir LNR	6.7.7	No consideration of the impacts of pollution or sediment run-off entering the LNR via surface water run-off.
Brampton Common LWS	6.7.8	The breeding bird survey has some significant limitations and therefore the conclusion that the LWS supported the lowest density of skylark within the survey area cannot be substantiated. Impact assessment does not fully consider the loss of skylark breeding territory. 36 ha would be lost, yet impact is stated as low magnitude, local, adverse.
Axle Lane LWS	6.7.15	Designated for an eyebright species which is associated with herb rich calcareous grassland. However, there is no consideration of whether this grassland type is present. No surveys for eyebright (a late flowering species) have been completed and therefore the distribution of this plant within the LWS is unknown.



		Proposed construction measures are reliant on removing turfs and re-instating these. However, there is no consideration of the ecology of this eyebright species and the correct timing of turf removal to ensure the plant remains on-site (assuming eyebright occurs within the works area)
Chesterfield Canal LWS	6.7.23-6.7.27	It is considered that insufficient detail is provided in the oCEMP to allow for the conclusion of no significant impact to be made.
Wet woodland	6.7.49	No consideration of the impacts of the track construction on the hydrology of the woodland. E.g. will there be an impact on surface water reaching the woodland and if so would this be permanent. Would this result in the drying out of the woodland
Otter and water vole	6.7.71	The proposed precautionary approach cited as being sufficient to avoid potential effects to water voles is not detailed within oCEMP.
White clawed crayfish	6.7.86	The oCEMP needs to include biosecurity measures to prevent the spreads of crayfish plague, given the known presence of signal crayfish in the order limits.
Bats	n/a	No assessment of the operational effect of the solar panels on foraging and commuting bats is provided.
Skylark	6.7.106	Given that skylark plots are areas of fields kept bare to encourage skylark to breed, how will maintaining crop/ grassland at a height of no more than 15 cm dissuade skylark from breeding? How is cropland to be harvested and then maintained in a condition that is unfavourable to nesting skylarks.
Barn owl	6.7.108	There are no specific embedded mitigation measures for barn owl within the oCEMP. Assumptions are made that there would be no habitat loss for barn owl. But the temporary loss of habitat is not quantified therefore it is unclear how the conclusion of no significant impact has been reached
Hobby	6.7.109	There are no specific embedded mitigation measures for hobby within the oCEMP.
Cettis' warbler,	n/a	Whilst it is acknowledged that this is a species which is expanding its range in the UK, it is still listed on Schedule 1 of the WCA 1981 and therefore should not have been scoped out of the assessment. Instead, given the short coming of the breeding bird survey, an assessment of this bird to utilise habitats within the order limits should have been given more consideration.
Operation and Maintenance		
Brampton Common LWS	6.7.117	The conclusion of no significant impacts to breeding skylarks within the LWS is based on the assumption that the loss of breeding habitat can be offset via offsite compensation areas. However, no detail on the provision of offsite compensation areas (presumably skylark plots) is provided within the oLEMP. The oLEMP simply says 50 sky lark plots are to be provided outside of the order limits, but no assurance on how this has been or will be secured is provided.
Axle Lane LWS	6.7.123	No consideration given to the eyebright species which is also a qualifying feature of the LWS and who presence suggest also the presence of species rich grassland.
Wet woodland	6.7.128	No consideration of any permanent changes to the hydrology of the wet woodland along Anston Brook is provided.
Reptiles	6.7.134-6.7.136	Within the oLEMP it is stated that 75 habitat piles are to be created within solar PV panel fields (Para 7.4.38 of the oLEMP). However,



		para 7.4.55 of the oLEMP states the grassland areas will be managed largely by grazing sheep. However, there is no mention of the how the habitat piles will be protected from sheep. Sheep grazing, unless at very low densities is incompatible with creating optimal habitat for reptiles. Therefore, the conclusion of a beneficial significant impact is not supported.
Otters	6.7.145	The reduction in nutrient inputs has not been quantified, therefore there is no certainty that the beneficial impact to otters as a result of this would be significant.
Skylark	6.7.157	The assessment of no significant impacts is reliant on the provision of a 50 skylark plots close to the site. However, these skylark plots are not secured, and no detail is provided on their likely locations.
Barn owl	6.7.158-6.7.159	No specific details relating to barn owl are provided within the oCEMP Grassland within the panel fields is to be grazed by sheep likely to result in a short sward of low suitability for foraging barn owl. 5 barn owl boxes are proposed but the majority of the site is with 1 km of a motorway. These measures are incompatible with providing suitable habitat for barn owls and it is therefore not appropriate to state that there will be a significant beneficial impact to barn owl.
Additional mitigation and residual effects.		
Additional mitigation	6.8.1	This section is confusing. Significant adverse effects at Brampton Common LWS, hedgerows and wet woodland at construction are anticipated even with embedded mitigation in place. Embedded mitigation within the oCEMP is then stated to minimise these effects with measures within the oLEMP inferred to provide appropriate compensation. However, this section doesn't seem to be proposing any additional mitigation measures.
Summary of Impact assessment	Table 6.13	The assessment has considered impacts with embedded mitigation in place and identified significant impacts for the following Brampton Common LWS Hedgerows Wet woodland Table 6.13 and the preceding assessment states that because of the measures within the oCEMP and oLEMP these impacts will be minimised, or the measures within the oLEMP provide compensation. However, this is not explicitly made clear. The oCEMP and oLEMP should not be considered to be additional mitigation.,

Cumulative Impacts

- 4.2.22 The assessment of cumulative impacts should be reconsidered once baseline survey work has been completed and the assessment of impacts has been amended to consider the comments raised above.



- 4.2.23 The following provides comments on those developments within or adjacent to the order limits as these are considered most likely to result in likely cumulative impacts and which have not been sufficiently considered within the ES.
- 4.2.24 The developments, Land off Moat Lane Wickersley and Land off Carr Lane Ulley are located within the cable route and Whitestone 2 respectively. Potential impacts to skylark are raised in relation to Land off Carr Lane Ulley with the ES stating that effects will be local and potentially offset by benefits to the wider breeding bird assemblage. As such cumulative impacts on skylark have not been sufficiently considered. For Land off Moat Lane Wickersley, it is stated no assessment of individual biodiversity, protected species or habitat features at a population scale have been made as the assessment assumes best practice measures will remove any potential effects. This needs further clarification on what is meant.
- 4.2.25 Land at Hard Lane, Kiveton is adjacent to W3. Assessment of impacts is based on a Preliminary Ecological Appraisal and effects on protected features will be avoided via reasonable avoidance measures. Further assessment of the potential for cumulative impacts needs to be undertaken.
- 4.2.26 Common Farm, Bookers Lane Dinnington. Adjacent to Whitestone 2 and in particular Brampton Common LWS. ES states there is a potential for cumulative impacts in relation to Brampton Common LWS but that these will not be significant. However, this ES chapter has identified a residual significant impact at construction stage, therefore, how can it be concluded that there will be no significant cumulative impacts.

4.3 Landscape

General LVIA Comments

- 4.3.1 Below sets out the Council's comments relating to the landscape and visual impact assessment sections of the application.

Methodology, Criteria and Process

- 4.3.2 Appendix 7.2: Landscape and Visual Impact Assessment Methodology provides a detailed description of the methodology, criteria and processes utilised for the ES Chapter. Para. 7.2.2 notes that "The methodology for this LVIA was informed by the Guidelines for Landscape and Visual Impact Assessment (The Landscape Institute and Institute of Environmental Assessment, 3rd Edition, 2013 (GLVIA3)), including Landscape Institute Notes Technical Guidance Notes (LITGN-2024-01) as required". LITGN-2024-01 refers to Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3). Other Technical Guidance is listed at Para. 7.2.8. Section 7.4 of Chapter 7 Landscape and Visual Impact sets out a summarised version of the assessment methodology and significance criteria. This follows best practice guidance and is therefore welcomed.



- 4.3.3 The criteria which informed the assessment are clearly outlined within various tables within Appendix 7.2, with Table 7.2.9 setting out the assessment approach in a matrix style typical of LVIA. Uncertainty remains however with the use of 'Moderate' as a significance criteria. Para. 7.2.40 states "This does not preclude a 'Moderate' effect of lower being significant or a greater than 'Moderate' effect not being significant", while Para. 7.2.43 states "Where 'Moderate' effects are predicted...these have been concluded as 'Significant' in the assessment presented in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.7], however, professional judgement can be used to determine whether the Moderate effects are Significant or Not Significant." A review of the summarised levels of effect within Chapter 7 (Section 7.7) identifies that levels of effect of Moderate or above are significant. Although this is welcomed, the wording identified above remains ambiguous and should be revisited. The overall judgements on Magnitude of Change may benefit from including a 'No Change' scenario where the Proposed Development or construction activity would not (or would no longer be) visible. This would help where the magnitude remains 'negligible' for instances where there is no visibility.
- 4.3.4 The process of the identification of landscape and visual effects was found to be in line with best practice; however the use of intermediate levels of effect and their potential for underplaying effects are discussed in the section below in Para. 2.1.8.

Baseline, Content and Findings of the Assessment

- 4.3.5 In general, the provided baseline sets out relevant landscape and visual receptors, however it is noted that locally designated Country Parks remain omitted from the assessment. Although Rother Valley, Ulley and Thrybergh Country Parks lie within the 3km Buffer of Order Limits (as illustrated on Figure 7.3: Landscape Designations) they are not formally assessed. While it is conceded there would be no direct effects on these Country Parks as a result of the Proposed Development, Figures 7.4: Zone of Theoretical visibility (ZTV) Overview, Figure 7.6: Zone of Theoretical visibility (ZTV) – Whitestone 2, and Figure 7.7: Zone of Theoretical visibility (ZTV) – Whitestone 3 indicate theoretical visibility within both Rother Valley and Ulley Country Parks and therefore experiential effects for receptors would potentially be present. It is therefore considered that potential effects on the valued attributes of the relevant Country Parks should be included in the landscape assessment.
- 4.3.6 Within the narrative for the magnitude of landscape effects and magnitude of visual effects set out in Appendix 7.3 and Appendix 7.4 respectively, it fails to properly identify factors with regard to size/scale, geographical extent, or duration/reversibility. The proportion of view within which the Proposed Development would be visible is discussed; however, there is no direct reference to the criteria mentioned above. Additionally with regards to visual effects the assessment does not discuss the number of people who may be affected by the change, as discussed within Para. 6.3 of GLVIA3 and Section 6(9) of LITGN-024-01.
- 4.3.7 With regards to viewpoints, the selected (and agreed) locations appear to cover relevant receptors (recreational users, road users, residents etc); however, following a site familiarisation visit by the



Stantec landscape team it was found that a large number of sensitive receptors may have been omitted, including local PRoW users (raised within the LPAs PMIE as a main issue), long-distance path users, road users and residents. In addition, a relatively large number of viewpoints (11 in total), were scoped out of the assessment as a result of screening by vegetation, one which was combined with another, and one relocated by agreement. It is generally considered good practice that where views from a previously selected viewpoint location are screened by vegetation or built form etc. that the surveyor should seek the nearest possible location where views are available. It is recognised that at times this may not be possible; however, this typically may occur with only a small number of locations across a large number of viewpoints (as is the case here). It is also the case that viewpoints with no visibility (particularly if previously agreed) can still be used to provide evidence of no visibility. This is however down to the assessor's preferred approach and is not mandatory.

- 4.3.8 Within Appendix 7.4: Representative Viewpoint Assessment it is stated in relation to fieldwork that "Winter visits were undertaken in March 2025 and February 2026. The summer visit was undertaken in July 2025." Chapter 7: Figures: Representative Viewpoints, Figures 7.4.7 – 7.4.62 however state the dates of photography to be April 2025 (29/04/2025, 30/04/2025), May 2025 (01/05/2025, 02/05/2025), September 2025 (4/09/2025, 16/09/2025, 17/09/2025, 18/09/2025), April 2026 (21/04/2026, 22/04/2026, 24/04/2026, 25/04/2026, 30/04/2026), and September 2026 (16/09/2026). This may be an error either within the survey dates in the Appendix, or the dates on the photo sheets themselves may be incorrect. Clarification is required on this matter.
- 4.3.9 The LVIA utilises intermediate criteria in relation to sensitivity, magnitude and level of effect. While there is no clear guidance on whether or not intermediate judgements should be used, it can at times be difficult to follow and potentially underplay effects. As an example, Table 7.2.6: Visual Susceptibility within Appendix 7.2: Landscape and Visual Impact Assessment Methodology states that residents at home are judged to be of high susceptibility; however in a number of instances (for instance at VP4, VP5, VP34, and VP37) residents are assessed as being of medium-high susceptibility, and in other instances (for instance VP17, VP20, VP21 and VP22) residents are assessed as being of medium susceptibility. This lack of consistency with regards to judgements could call into question the validity of the findings. The Applicant should provide some reasoning for these judgements where they stray from those prescribed in the Methodology. Where this variation in susceptibility occurs it should be accompanied by detailed reasoning, such as non-primary views, extensive vegetation within the curtilage etc.
- 4.3.10 The decision to not undertake a Residential Visual Amenity Assessment (RVAA) by the Applicant is agreed given that where major adverse and significant visual effects are predicted over an extended period (i.e. 15 years after planting) no residential properties are predicted to experience overbearing or overwhelming change. The LVIA would however benefit from a clearer understanding of the reasoning behind its non-inclusion.
- 4.3.11 With regards to measures taken to provide safe access for construction vehicles (i.e. vegetation removal as illustrated on Figure 2.9.1: Vegetation Removal Plans) the LVIA does not discuss potential



changes to views as a result of removal. For instance, at VP44: Upper Whiston (East), Field Lane / Whiston Bridleway No.20 extensive hedgerow removal is planned (Ref. H22 - H25) along the northern and southern carriageway of Morthen Lane along with an access track which would result in the conspicuous presence of vehicles and associated construction movements. In this instance the LVIA identifies a medium to high magnitude of change stating that “construction activity would be visible for a moderate to large proportion of the view”. Although we would agree with the overall finding there is no mention of vegetation loss which would potentially open views further. The majority of hedgerow loss is across short sections, and these are identified within Appendix 7.3: Landscape Character Baseline and Assessment where relevant. A short paragraph within the introduction section of the LVIA to describe hedgerow loss / management across the Scheme would be useful. Appendix 7.3 also makes reference to “Assumed clearance of up to 6m of hedgerow and vegetation along the Cable Corridor”. In line with Figure 2.9.1 it would appear that the majority of hedgerow loss would be to facilitate access for solar panel construction, and hedgerows within the cable corridors would require “to be managed at 0.25m during construction”. Hedgerow loss to facilitate access would appear to be far greater than 6m overall and should therefore be calculated and set out in the LVIA / Appendix 7.3 / Appendix 7.4.

- 4.3.12 In terms of embedded mitigation, the proposals appear to take account of all reasonable measures with regards to offsets, and Table 7-11 Location Specific Landscape and Visual Mitigation Measures provides a useful overview of the steps taken.

Critique of the Presentation of the Findings of the Assessment

- 4.3.13 Generally the LVIA is clearly set out, and summary tables are a useful addition given the level of information. The use of Appendices for detailed landscape and visual assessments results in the main Chapter being more digestible.
- 4.3.14 The sequence of Figures and their associated numbers within Chapter 7: Figures (Part 1) are a little confusing, making them difficult to follow. National Landscape Character Areas also appear on the plan twice for each discrete area (Figure 7.3.1).
- 4.3.15 The series of ZTVs which accompany the LVIA state in the notes section that OS Terrain 5 Digital Terrain Model (DTM) data was used to inform theoretical visibility; however, the methodology states that a DEFRA composite 2m First Return Digital Surface Model (DSM) was used. These two datasets can return very different results, therefore the LVIA needs to be clear on which of these is correct. Given that theoretical visibility is shown within urban areas it appears likely that DTM data was used.
- 4.3.16 It would be beneficial to show the location of the Substations and BESS on the associated ZTV plans (Figure 7.9 and Figure 7.10).

Outline Landscape and Ecological Management Plan (oLEMP)

- 4.3.17 The oLEMP (Volume 5: Reports and Statements 5:13 Outline Landscape and Ecological Management Plan provides a thorough overview of “the short and long-term practices that will be implemented to



establish, monitor, and manage landscape and ecology mitigation and enhancement (biodiversity net gain) measures embedded in the design)." The oLEMP is also Appended with the Indicative Landscape Mitigation Plan (Appendix A) and Indicative Permissive Path Plan (Appendix B). A review of the oLEMP has been undertaken to understand where the mitigation proposed has effectively altered and reduced the potential effects associated with the Proposed Development, and potentially where additional measures could be taken to maximise its potential. The LVIA also summarises mitigation proposals in Section 7.6: Embedded Mitigation Measures. It is appreciated that the oLEMP is an outline document, with further detail expected to follow during the post-consent stage of the application.

- 4.3.18 Species selection should align with those identified within Appendix 6.14: Arboriculture Survey and Tree Constraints Plan but may also include additional suitable species in order to diversify existing conditions. For instance, within the oLEMP Table 7.3: Indicative mix for proposed native tree belts, *Carpinus betulus* (Common Hornbeam), and *Tilia cordata* (Small-leaved Lime) are identified within the mix, however they are not present within the Arboriculture Survey. These additional species may however be acceptable to diversify existing conditions.
- 4.3.19 With regards to the presentation of the Indicative Landscape Mitigation Plan, the colour associated with existing vegetation within the legend does not equate with the existing vegetation within the main plan, thereby reducing legibility.
- 4.3.20 Aside from the occasional area where development boundaries appear a little arbitrary, for instance within the angular, 'bucket-shaped' area of land east of Treeton and north of Wood Lane, the approach to mitigation appears reasonable and attempts to reduce significant effects where possible.
- 4.3.21 The addition of Permissive Paths as identified on the Indicative Permissive Path Plan (Sheets 1-7) is welcomed and should provide additional connections for recreational users between existing PRoW, although it is noted that Permissive Paths can be closed at any time by the relevant landowners.

4.4 Drainage

- 4.4.1 The Council as LLFA is generally in support of the flood information and surface water strategy outlined in the FRA and SWDS. We have not assessed in detail the flood model data within the FRA as this is expected to be under review by the Environment Agency, though we do not have any objections to the overall findings and approach at this stage. However, there is one key area of concern as follows:

Requirement for Land Drainage Consents for interactions with existing watercourses.

- 4.4.2 The Applicant is seeking to disapply this provision in the DCO. However, if the LLFAs do not consent to that disapplication, then a Land Drainage Consent application will be required to allow for any temporary or permanent works that may affect the flow of an ordinary watercourse.



- 4.4.3 This would require a provision stating that Section 23 of the Land Drainage Act 1991 (prohibiting obstructions or culverts in ordinary watercourses without consent) does not apply to the works authorized by the order.
- 4.4.4 We must ensure the article also disapplies any local Internal Drainage Board (IDB) or Lead Local Flood Authority (LLFA) byelaws made under Section 66 of the Act that dictate separate approvals.
- 4.4.5 The separate permit process must be replaced with Protective Provisions embedded in a Schedule of the DCO.

Recommendation

- 4.4.6 A specific part should be included in the DCO Schedules detailing "For the Protection of Drainage Authorities". These provisions establish a tailored process where the applicant must still submit plans to the relevant drainage authority (LLFA or IDB) for approval before work begins, maintaining flood risk protections while keeping the workflow legally inside the DCO

4.5 Heritage

Context

- 4.5.1 The applicant accepts there are numerous heritage assets, the setting of which assets would be subject to change as a result of the construction and operational phases of the Proposed Development. The assets which are likely to be affected by the Proposed Development are set out Chapter 8 of the Environmental Statement (document APP-060).
- 4.5.2 We note that the applicant has made further revisions to the documents following pre-application discussions. However, further assessment and refinement are required before clear conclusions can be reached. Having regard to the comments of statutory consultees, this is likely to remain a matter for further consideration during the Examination.

Policy and material considerations

- 4.5.3 The applicant's approach to identifying the relevant policies is appropriate overall, however, evidently since the submission the NPPF has been updated and the submission should be reviewed accordingly. Furthermore, we consider the submission should recognise and reference the relevant Conservation Area Appraisals across Whitestone 1, 2 and 3 as material considerations, and the heritage assessments should be refined with this in mind.

Relevant assets and sieving

- 4.5.4 The applicant concludes in Chapter 8 of the ES that in EIA terms the level of effect would not be significant. The Cultural Heritage and Archaeology chapter finds some Moderate adverse effects on the following assets:



- 1010828 Conisbrough Castle, Scheduled Monument
- 1491751 Conisbrough Parks Romano-British Villa, Scheduled Monument
- Barlborough Hall Registered Park and Garden; and
- Barlborough Conservation Area.

4.5.5 Minor adverse effects are predicted for the following assets:

- Ulley Conservation Area
- 1314636 Hardwick Hall, Grade II Listed building; and
- 1151523 Manor House, Grade II Listed building.

4.5.6 The Environmental Statement outlines the Order Limits have been reduced to pull the boundary away from a number of heritage assets (as explained at paragraph 8.6.2 of the Environmental Statement Chapter 8 Cultural Heritage and Archaeology, document APP-060).

4.5.7 However, it is unclear whether the assets referenced in this section of the ES have been subject to further assessment or whether they are now 'sieved out' (document APP-115). Further clarification should be provided on these points as part of an assessment of heritage matters in the manner required by EN-1 and the NPPF.

Assessment of harm and impact

4.5.8 Overall, the assessment of heritage matters is formulated against broader EIA tests of significant and arrives at an overall conclusion of '*less than substantial* harm'. However, the assessment seemingly seeks to address both EIA and heritage policy matters in the same generalised way despite the different approach required in EIA terms compared with an assessment of heritage assets in line with EN-1 and the NPPF.

4.5.9 Whilst the approach to 'sieving' assets for further assessment is understandable, there does not appear to be a detailed assessment of the remaining assets nor a firm conclusion of the potential harm to each asset which is contrary to NPPF and EN-1, recognising the NPPF has been recently updated. Nevertheless, it is incumbent on the applicant to properly assess each asset and provide a clear conclusion on an asset by asset basis on the level of harm. The applicant's approach is not supported and without such an assessment the council cannot fully respond on heritage matters.

4.5.10 Chapter 8 and the associated appendices identify the moderate and minor adverse effects summarised above, which the applicant concludes amount to less than substantial harm at the lower end of the scale. However, given the variation in the level of harm identified, a more nuanced assessment is required. This reinforces the concern that individual asset assessments have not been undertaken as required by EN-1 and the NPPF. This is particularly important for assets of the greatest



significance, including Barlborough Hall, where the applicant acknowledges that the loss of agricultural land would affect the setting of the asset by diminishing the sense of its historic rural context.

- 4.5.11 As highlighted below by SYAS, these concerns also relate to the approach taken to archaeological matters where adverse effects are anticipated but no mitigation is laid out, nor a justification for no mitigation. It is reasonable to consider the applicant should follow the established evaluation and justification approach, which is currently lacking in the submission.
- 4.5.12 It is then necessary for the applicant to undertake further consideration of the cumulative impact on the historic environment, as the current level of detail is limited. Given the extent of the proposals, this requires greater consideration and we request further assessment in this regard.

4.6 Archaeology

- 4.6.1 Comments have been provided by South Yorkshire Archaeology Service (SYAS) in respect of archaeology. These are provided below.
- 4.6.2 SYAS is a joint service maintained by Barnsley Metropolitan Borough Council, City of Doncaster Council, Rotherham Metropolitan Borough Council and Sheffield City Council. It provides archaeological advice to those authorities. This letter sets out SYAS's Relevant Representation in response to the Development Consent Order application for Whitestone Solar Farm.
- 4.6.3 Archaeological matters are addressed within the Environmental Statement Chapter 8: Cultural Heritage and Archaeology [APP-060], Figures [APP-077] and is supported by a series of technical appendices including 8.1 Legislation Policy and Guidance [APP-112]; 8.2 Cultural Heritage Baseline [APP-113]; 8.3 Sieving Exercise [APP-114]; 8.3.1 Sieving Exercise Assets [APP-115]; 8.4 Assessment of Indirect Effects to Setting [APP-116]; 8.5 Geoarchaeological Desk-Based Assessment [APP-117]; 8.6 Geophysical Survey [APP-118]; 8.7 Archaeological Investigation and Preservation Strategy [APP-119]; 8.8 Cable Corridor Geophysical Survey Report [APP-120]; 8.9 Phase I Trial Trenching Report [APP-121]. An Outline Written Scheme of Investigation [APP-049] has also been submitted.

Summary position

- 4.6.4 SYAS supports the principle of a proportionate and phased archaeological strategy for a solar development of this scale. The assessment has included desk-based assessment, geoarchaeological assessment, walkover survey, geophysical survey and targeted intrusive evaluation. The general approach is broadly consistent with the principles of the Archaeology and Solar Farms Good Practice Guide (2026).
- 4.6.5 The principal concern is whether the submitted archaeological assessment, investigation & preservation strategy and draft DCO provide sufficient information and clear mechanisms to secure proportionate, location-specific archaeological mitigation across the Order Limits.



- 4.6.6 Elements of the pre-consent evaluation remain incomplete; zoning based on impact and archaeological sensitivity is not yet fully defined or mapped; and the relationship between the Archaeological Investigation and Preservation Strategy (AIPS), Outline Written Scheme of Investigation (oWSI), detailed design and draft DCO requirements requires clarification. Consequently, the application does not yet provide sufficient confidence that significant archaeological remains will be identified, evaluated and appropriately avoided, preserved or recorded before works commence.
- 4.6.7 SYAS considers that the Applicant should demonstrate that the archaeological mitigation proposed is sufficiently evidenced, spatially defined, deliverable and secured for the particular locations and impacts to which it would apply.

Principal Issues

Completion and integration of archaeological evaluation

- 4.6.8 Elements of the planned Phase I archaeological investigation remain incomplete and some reports have not been updated to reflect the most recent position. The final results have therefore not yet been incorporated into the ES, Cultural Heritage Baseline, AIPS or oWSI.
- 4.6.9 Consequently, the application does not yet present the complete evidence base upon which the final assessment of impact, archaeological significance and mitigation strategy will depend. Unless the outstanding investigations are completed, reported and reviewed sufficiently early, there may be inadequate time to consider whether their results require additional evaluation, design amendment or area-specific mitigation.

Definition and mapping of archaeological sensitivity

Areas of Heightened Archaeological Sensitivity

- 4.6.10 Areas of Heightened Archaeological Sensitivity (HAS) are a central component of the proposed investigation and mitigation strategy. The documents describe them by reference to heritage assets of known regional research value, or with the potential to be of regional research value. However, they do not provide sufficiently clear and consistently applied criteria for determining:
- what evidence is required for an area to be designated as HAS;
 - how archaeological potential, research value and heritage significance are distinguished;
 - how the boundary of each HAS area has been defined;



- how uncertainty in the evidence has been addressed; or
- how HAS areas relate to High Sensitivity and Unknown Sensitivity Zones.

- 4.6.11 Not all locations that may satisfy the stated criteria appear to have been identified and mapped. This is particularly relevant to the cable corridors, where the final survey evidence has not yet been fully integrated into the ES and associated zoning.
- 4.6.12 The definition, criteria, evidential basis and mapped extent of all HAS areas should therefore be examined and agreed before the zoning is relied upon to determine the scope of post-consent evaluation, preservation or mitigation.

Areas of unresolved or uncertain archaeological potential

- 4.6.13 The definition of Unknown Sensitivity Zones appears too narrow to capture the full range of uncertainty arising from the evidence base. It is principally directed towards undated enclosures, ditches and earthworks identified through geophysical survey or Historic Environment Record data. It does not clearly account for:
- isolated or low-density archaeological remains;
 - remains with weak or negligible magnetic responses;
 - archaeological activity not expressed as ditched enclosures;
 - early prehistoric and early medieval remains that may be difficult to detect through magnetometry;
 - or
 - areas in which magnetic disturbance has prevented reliable interpretation.
- 4.6.14 This is particularly important in areas affected by the spreading of green waste, where magnetometry survey has not produced reliably interpretable results. Such areas should not be treated as archaeologically blank. Their archaeological sensitivity remains unresolved and should be identified as such in the baseline and sensitivity mapping.
- 4.6.15 Where other evidence identifies archaeological potential, for example, the Heritage baseline notes the high potential for further heritage assets of Romano-British and Medieval date within the Conisbrough Parks landscape, the inability of magnetometry to provide useable results increases rather than resolves uncertainty. The AIPS should identify how that uncertainty will be addressed through methods appropriate to the anticipated archaeological resource and the nature of the proposed impact.

Landscape-scale archaeological potential



- 4.6.16 The assessment principally describes discrete archaeological sites, Historic Environment Record entries and geophysical anomalies. This is necessary, but may not adequately address the potential significance of relationships between archaeological remains across the wider landscape.
- 4.6.17 This is particularly relevant within the Conisbrough Parks landscape. The scheduled Roman villa at Conisbrough Parks indicates a locus of elite Roman-period activity centred around the management of an estate. This sits within a wider landscape that also includes evidence for early medieval activity in and around Conisbrough, associations with high-status landholding and the medieval elite centre represented by Conisbrough Castle.
- 4.6.18 The application does not include an assessment of the significance of this landscape as a multi-period elite centre, including its potential to preserve evidence for continuity or discontinuity between Roman, early medieval and medieval systems of landholding, settlement, routeways and administration. This research potential is itself part of the archaeological interest and heritage significance of the area.
- 4.6.19 SYAS does not suggest that landscape-scale archaeological interest should automatically be assigned a particular level of significance. Rather, the baseline and investigation strategy should identify where relationships between known and potential remains represent a material research question and ensure that evaluation and mitigation are designed to investigate or preserve those relationships.

Historic Environment Character

- 4.6.20 The Cultural Heritage Baseline describes aspects of Historic Environment Character, and historic landscape character is considered where it contributes to the setting and significance of selected designated heritage assets. It is not clear, however, whether the assessment has considered potential effects on the inherited character and time-depth of the landscape more generally.
- 4.6.21 Historic landscape assessment is distinct from, although related to, landscape and visual assessment and differs from the landscape archaeological approach in that it relates to the physical components of the landscape itself rather than buried archaeological features. It considers matters including inherited land-use patterns, historic boundaries, routeways, the legibility of former landscapes and relationships between archaeological sites.
- 4.6.22 The Applicant should clarify whether Historic Environment Character has been assessed as part of the cultural heritage assessment and, if so, identify the relevant receptors, assessment criteria and conclusions. If it has been scoped out as a separate consideration, the evidential basis for that decision should be explained.

Definition and assessment of development-related ground disturbance

- 4.6.23 The nature, extent and depth of development-related ground disturbance are not defined with sufficient clarity to allow archaeological impacts and proposed mitigation to be assessed on an area-specific basis.



4.6.24 Particular matters requiring clarification include:

- low-voltage and inter-array cabling and associated connections;
- foundations for substations and other ancillary equipment;
- access tracks, drainage and permissive paths;
- construction compounds and temporary working areas;
- vehicle tracking, rutting, soil compression and ground levelling;
- tree pits, hedge trenches, scrub planting and other landscaping works;
- the creation or modification of grassland, scrapes and ecological mitigation features;
- the removal of infrastructure during decommissioning;
- remediation of tracks and hardstanding; and
- soil-loosening or other operations undertaken to return land to agricultural use.

4.6.25 The comparison of some ancillary works with the impact of timber fenceposts does not adequately reflect the potentially greater or more extensive disturbance associated with cabling, drainage, access and landscaping. Similarly, assumptions that overburden will protect archaeological remains from construction traffic do not appear to be supported by sufficiently detailed information about soil and overburden depth.

4.6.26 SYAS recognises that the final location and construction methodology for every element may not yet be available. Nevertheless, the ES should identify credible worst-case parameters, and the control documents should provide a mechanism for comparing the final design against archaeological sensitivity before the relevant works commence.

Integrated mapping of sensitivity, impacts and mitigation

4.6.27 The application does not clearly map the predicted areas, depths or forms of construction-related ground disturbance against the known and potential archaeological resource i.e. anticipated impact against archaeological sensitivity.

4.6.28 Without integrated impact and sensitivity mapping, it is difficult to demonstrate that the proposed mitigation is proportionate and applicable to the particular locations in which impacts may occur.

4.6.29 SYAS considers that separate figures showing impact areas and archaeological sensitivity and a combined figure showing both to illustrate magnitude of effect, are provided to accompany the Investigation and Preservation Strategy. This will bring the approach more in line with the Archaeology



and Solar Farms Good Practice Guide (2026) which recommends defining disturbance zones and sensitivity areas as supporting the development of archaeological methodologies aligned to specific site conditions and project impacts.

Archaeological investigation, preservation and mitigation

Archaeological recording and residual effects

- 4.6.30 The ES indicates that further archaeological work resulting in preservation by record could reduce adverse effects to Not Significant. SYAS considers that this requires clarification.
- 4.6.31 Archaeological excavation and recording can mitigate the consequences of the loss of archaeological remains by recovering and disseminating information. It does not preserve the remains themselves or reduce the physical magnitude of their removal. The residual-effect assessment should therefore distinguish clearly between:
- avoidance or preservation in situ, which prevents or reduces physical harm;
 - design measures that reduce the extent or depth of impact; and
 - archaeological excavation and recording, which mitigate the consequences of accepted physical loss through the recovery of information.
- 4.6.32 The ES should explain how preservation by record has been taken into account in determining residual effects, including the extent to which the significance of the affected asset depends upon information that can realistically be recovered through investigation.

Selection of evaluation methods

- 4.6.33 The AIPS should adopt an explicitly question-led approach to the selection of evaluation methods. Magnetometer survey is effective for many forms of archaeological remains, but a lack of anomalies cannot in every location be treated as evidence of a lack of archaeology.
- 4.6.34 The proposal not to trench geophysically blank areas located away from identified settlement should therefore be qualified. The appropriateness of that approach will depend upon:
- the reliability of the survey in the particular ground conditions;
 - the types and periods of archaeology reasonably anticipated;
 - evidence from desk-based, topographic, aerial, LiDAR or geoarchaeological sources;
 - the nature and magnitude of the proposed impact; and
 - the research questions relevant to the area.



- 4.6.35 The final strategy should explain how the evaluation method for each area has been selected to address the particular uncertainty identified.

Deliverability of avoidance and preservation measures

- 4.6.36 The ES concludes that embedded mitigation will avoid significant effects, but the AIPS recognises circumstances in which high-impact works may affect areas of high archaeological sensitivity. The documents should therefore explain:
- the circumstances in which avoidance or preservation in situ may not be achievable;
 - how such circumstances will be identified;
 - who will determine the appropriate response;
 - whether design modification must be considered before excavation;
 - how any residual effect will be reassessed; and
 - how the agreed mitigation will be secured.
- 4.6.37 The deliverability of particular avoidance measures also requires further explanation. For example, the use of directional drilling beneath heritage assets depends upon relevant engineering, geological and geotechnical constraints. Where the ES relies upon such measures to avoid significant effects, it should provide proportionate evidence that the measures are feasible or establish an appropriate fallback position.

Archaeological considerations during decommissioning

- 4.6.38 The final decommissioning methodology cannot reasonably be defined at this stage. It is therefore appropriate for the detailed archaeological response to be determined later, but the present control documents should establish the process by which that response will be prepared, consulted upon, approved and implemented.
- 4.6.39 The oDEMP, AIPS and oWSI should require a phase-specific archaeological decommissioning strategy to be submitted before decommissioning works commence. That strategy should:
- review the archaeological evidence available at that time;
 - identify areas preserved in situ during construction and operation;
 - assess the proposed decommissioning methodology and ground disturbance;
 - define any protection, monitoring or investigation required;
 - identify the role of the archaeological contractor or Archaeological Clerk of Works; and



- include arrangements for reporting, archiving and dissemination.

Route to resolution

4.6.40 SYAS considers that these matters are capable of resolution during the Examination through the following measures:

- Completion and reporting of the outstanding Phase I archaeological investigations sufficiently early in the Examination to allow their implications to be considered.
- Updating the Cultural Heritage Baseline and relevant parts of the ES to incorporate the completed investigations and identify remaining limitations in the evidence.
- Defining the criteria and evidential thresholds for HAS, High Sensitivity and Unknown Sensitivity Zones, and explaining the relationship between those categories.
- Provide a zoning plan with figures showing scheme impacts, archaeological sensitivity and a combined plan to show magnitude of effect.
- Updating the AIPS to identify the decision-making process by which agreed investigation, design avoidance, preservation in situ, excavation, monitoring or other mitigation will be assigned to particular locations.
- Ensuring that archaeological evaluation is question-led and uses methods appropriate to the archaeological potential, survey limitations and proposed impacts in each area.
- Providing a clear approval mechanism for detailed design measures relied upon to preserve archaeological remains in situ.
- Securing the preparation and approval of an archaeological decommissioning strategy before relevant decommissioning works commence.
- Amending the draft DCO as necessary to secure the final AIPS, relevant detailed WSIs and phase-specific design measures.

Draft DCO and securing mechanisms

4.6.41 The ES presents both the AIPS and oWSI as integral components of the archaeological mitigation framework. However, only the oWSI is presently identified as a document to be certified under Schedule 13. SYAS considers that the Examination should establish whether the AIPS should also be certified or otherwise expressly secured by the DCO.

4.6.42 The current AIPS is an overarching framework. It identifies a range of investigation, preservation and mitigation measures but does not yet assign final measures to all specific locations. Following



completion of the evaluation programme, a final AIPS should record the agreed archaeological response for each relevant area, including:

- areas subject to excavation or other archaeological recording;
- areas in which remains will be preserved in situ;
- the design measures required to achieve that preservation;
- areas requiring construction monitoring; and
- areas in which no further archaeological work is required.

4.6.43 This would provide a transparent record of the agreed mitigation across the Order Limits, including locations where preservation through design means that no separate investigative WSI is required.

4.6.44 SYAS supports the general preservation principles set out in the AIPS and oWSI but Requirement 10 does not appear to provide a clear mechanism for approving the final, phase-specific engineering and construction details upon which preservation in situ will depend. Provision should be made to secure a mechanism to require the detailed design for each phase to accord with the archaeological documents approved under Requirement 10.

4.6.45 The precise drafting should be agreed between the Applicant, the relevant planning authorities and SYAS during the Examination.

Archaeology Conclusion

4.6.46 SYAS supports continued engagement with the Applicant to resolve these matters. Its concern is not that a phased archaeological approach is inappropriate in principle, but that the application must provide a sufficiently clear connection between the emerging evidence base, the impact and sensitivity zoning, the final design, the mitigation selected for each location and the mechanism by which that mitigation will be approved and enforced.

4.6.47 Until that connection is demonstrated and appropriately secured, SYAS cannot confirm that the application provides sufficient confidence that significant archaeological remains throughout the Order Limits will be appropriately identified, evaluated and mitigated.

4.7 Noise

4.7.1 The below comments relates to Chapter 14 and its appendices relating to noise.

Issue Summary	Comment
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Construction noise LOAEL/SOAEL criteria require further justification	Table 14-6 defines the LOAEL for construction and decommissioning noise as the relevant BS 5228-1 ABC category threshold, with the SOAEL defined as the Category C threshold values of 75 dB $L_{Aeq,T}$ during the daytime, 65 dB $L_{Aeq,T}$ during evenings/weekends, and 55 dB $L_{Aeq,T}$ at night. However, the ES does not clearly explain the rationale for equating the BS 5228-1 ABC category thresholds with LOAEL, or for adopting the Category C threshold as SOAEL in all cases. DMRB for example, sets the LOAEL as the ambient sound level, and the SOAEL and the ABC category threshold. This is important because, depending on the existing ambient sound level category, the adopted SOAEL may be 10 dB higher than the applicable ABC assessment threshold. The Applicant should provide further justification for the derivation of the construction and decommissioning noise LOAEL and SOAEL criteria, including how these align with BS 5228-1, the PPG noise exposure hierarchy and the NPSE concepts of LOAEL and SOAEL. Where such justification cannot be provided, the assessment should be revisited using criteria more closely aligned with the BS 5228-1 ABC threshold approach.
Construction vibration LOAEL/SOAEL criteria require further justification	Table 14-6 adopts 1.0 mm/s PPV as the LOAEL and 10 mm/s PPV as the SOAEL for construction and decommissioning vibration. The Council notes that the justification for the 1.0 mm/s PPV threshold appears to rely on BS 5228-2 guidance indicating that vibration at this level in residential environments is likely to give rise to complaints, although it may be tolerated where prior warning and explanation have been provided. This description appears to correspond to an adverse response rather than simply the onset of the lowest observable adverse effect. The Applicant should therefore provide further justification for adopting 1.0 mm/s PPV as the LOAEL, including how this aligns with the NPSE and PPG noise exposure hierarchy. Similarly, the adopted SOAEL of 10 mm/s PPV appears to be based on BS 5228-2 guidance describing a level that is likely to be intolerable for more than a very brief exposure in most building environments. The Council considers that this description may sit closer to the upper end of the significant adverse response range, rather than necessarily representing the onset of SOAEL. The Applicant should justify the selected SOAEL and explain why lower vibration thresholds have not been adopted, or provide a sensitivity assessment using alternative, more precautionary criteria.
Construction traffic noise criteria accepted	The Council agrees with the assessment criteria used for construction and decommissioning traffic noise.
Potential non-residential sensitive receptors have not been clearly identified or assessed	The Council notes that the assessment appears to focus on residential receptors, with limited evidence that other potentially noise- or vibration-sensitive receptors have been identified and assessed. The ES should clearly identify all receptor types within the relevant study areas, including, where applicable, schools, healthcare facilities, places of worship, community facilities, recreational areas, commercial receptors with noise-sensitive uses, ecological receptors



	where relevant, and Public Rights of Way where prolonged construction exposure or amenity considerations are relevant. The sensitivity of each receptor type should be defined and justified. The Applicant should also explain whether the adopted LOAEL and SOAEL values are appropriate for each receptor type. Criteria derived primarily for residential receptors may not be suitable for all sensitive receptors, particularly where the relevant use, period of sensitivity, duration of exposure, or activity affected differs from residential use. Where non-residential receptors are identified, suitable receptor-specific LOAEL and SOAEL values should be set, justified by reference to relevant guidance, standards and professional judgement, and used in the assessment of likely significant effects. Where receptors have been screened out, the ES should provide a clear justification for doing so. If non-residential sensitive receptors or Public Rights of Way have not been considered, the assessment should be updated to include them or provide a robust explanation as to why they would not be materially affected.
Cable Corridor duration assumptions are not clearly evidenced or secured	The Council notes that the ES concludes that noise impacts from Cable Corridor works would generally be short-term, with exposure at receptors expected to last for “a matter of hours” as the works progress linearly. However, this assumption has not been clearly evidenced or secured. Cable corridor works may be prolonged in some locations due to joint bays, trenchless crossing launch or reception areas, utilities constraints, difficult ground conditions, access limitations, archaeological or ecological constraints, reinstatement works, or other construction complexities. The Applicant should therefore provide further evidence to justify the assumed duration of cable works in proximity to noise-sensitive receptors, including anticipated rates of progress and identification of locations where works may remain static or semi-static for longer periods. Where prolonged works could occur near receptors, the assessment should consider the potential duration of exposure against the adopted significance criteria. The CEMP should also secure controls requiring additional mitigation, monitoring, community liaison and, where necessary, prior notification to and agreement with the relevant Council where cable works are expected to occur near receptors for longer than assumed in the ES.
Piling noise and vibration assumptions appear inconsistent and require clarification	The Council notes that the construction noise assessment appears to be based on a rotary piling rig, whereas the construction vibration assessment appears to be based on a vibratory piling rig. This creates uncertainty regarding the piling method or methods that have been assessed and whether the assumptions are internally consistent. The assessment does not justify why other potentially noisier piling techniques or piling rigs have not been considered. Piling noise and vibration can vary materially depending on the method used, plant selection, ground conditions, pile/post type, installation duration and proximity to receptors. It is therefore not clear whether the assessed



	piling plant represents a reasonable worst case for both construction noise and construction vibration. The Applicant should confirm the piling method or range of methods that may be used, identify the specific plant assumptions and source data used in both the noise and vibration assessments, and justify why these are representative or worst case. Where the piling method has not yet been fixed, the assessment should either consider the worst-case credible piling method or secure a requirement that the final piling method and plant will be no worse, in noise and vibration terms, than that assessed. The oCEMP should also be updated to include any necessary controls on piling methodology, working hours, stand-off distances, monitoring and prior agreement with the relevant Council where alternative piling methods are proposed.
Construction vibration effects on Chesterfield Canal and Harthill Reservoir require asset-specific limits and monitoring	The Council notes that the assessment refers to Chesterfield Canal and Harthill Reservoir in relation to construction vibration, and relies on a peak particle velocity criterion of 15 mm/s PPV as the threshold below which cosmetic damage to structural elements is not expected. While this provides a useful reference for building cosmetic damage in accordance with BS 5228-2 and BS 7385-2, it does not, on its own, demonstrate that vibration effects on the specific waterway and reservoir assets would be acceptable. The Applicant should therefore consult the relevant asset owners/operators, including the Canal & River Trust where applicable and the relevant reservoir undertaker, to agree appropriate asset-specific vibration limits and monitoring requirements. This should include consideration of potential effects on structural integrity, serviceability, embankment stability, water-retaining structures, and disturbance or mobilisation of bed or bank sediment during works. Any agreed limits, monitoring locations, trigger/action levels and contingency measures should be secured through the CEMP prior to works taking place in proximity to these assets.
Construction working hours and out-of-hours controls require clarification	The proposed construction hours do not align with the Council's standard construction hours. The Applicant should confirm that noisy works would be restricted to the Council's standard construction hours, unless otherwise agreed in advance with the relevant Council. Any works proposed outside the agreed standard working hours, including exceptional activities such as trenchless crossings or other time-sensitive works, should be subject to prior agreement with the relevant Council through a Section 61 consent under the Control of Pollution Act 1974, where applicable. The Council notes that the oCEMP identifies core construction hours and states that exceptions may be required for trenchless crossings or time-sensitive activities. It also states that works outside core hours will comply with restrictions agreed with the relevant planning authorities. However, the oCEMP does not explicitly commit to obtaining a Section 61 consent under the Control of Pollution Act 1974 for noisy works outside the agreed working hours. The Applicant should update the oCEMP to confirm that any noisy works proposed outside the Council's standard construction hours, including exceptional or continuous working, will be agreed in advance with the



	relevant Council and, where applicable, subject to a Section 61 consent.
Operational noise magnitude criteria and +5 dB approach require further justification	Table 14-11 appears to define Minor impacts where operational rating levels are less than +5 dB above the prevailing background sound level, depending on context; however, the surrounding text appears to imply that levels up to +5 dB may be treated as Not Significant. The Council considers that further justification is required for this approach. BS 4142 identifies that a rating level around +5 dB above background is likely to indicate an adverse impact, depending on context, and does not establish a general acceptance criterion of up to +5 dB above background. The final assessment should therefore include a more detailed contextual appraisal, particularly where the Proposed Development would introduce a new fixed plant noise source with a potentially different acoustic character to the existing sound environment. The Council considers that this contextual assessment should include, where relevant, consideration of audibility, the absolute rating and specific sound levels, the margin above or below the representative background sound level, spectral differences between the existing residual sound environment and the proposed plant noise, and the likely character of the source, including tonality, intermittency, low-frequency content or other distinctive features. Without this justification, the assessment may understate the potential for adverse effects where rating levels approach or exceed the background sound level. In the absence of robust justification, the Council considers that operational rating levels should be designed to not exceed the representative background sound level at noise-sensitive receptors, with exceedance of background treated as the onset of adverse effect. A rating level around +5 dB above background should be treated as the point at which significant adverse effects may arise, subject to context. The Applicant should either adopt this approach or provide clear technical justification for the alternative magnitude criteria used in Table 14-11. The Council also notes that footnote (1) to Table 14-11 refers to further explanation elsewhere in the ES, but the cross-reference is unresolved. The Applicant should correct this reference and provide the missing justification, particularly if absolute rating level caps such as 42 dB $L_{Ar,Tr}$ during the daytime and 37 dB $L_{Ar,Tr}$ at night have been used to reclassify greater exceedances of background as Minor impacts.
Baseline survey meteorological conditions and wind-direction effects are not presented	The Council notes that the measured weather conditions during the baseline noise survey periods have not been presented. The Applicant should provide raw or summarised meteorological data used to validate the survey, including wind speed, wind direction, rainfall and any periods excluded from the dataset due to unsuitable weather conditions. Where data from a nearby weather station have been used, the source and location of that data should be identified.



	The Applicant should also confirm how weather conditions were reviewed when selecting representative background sound levels and whether any periods affected by adverse or unrepresentative weather were removed from the analysis. This is particularly important because the baseline acoustic environment is reported to be influenced by major road traffic sources. Wind direction can have a material effect on measured sound levels from distant or dominant road traffic sources, with downwind conditions potentially increasing measured levels and upwind conditions reducing them. The Applicant should therefore demonstrate that the selected representative background sound levels are not unduly influenced by atypical wind direction conditions relative to the main road traffic sources, or explain how this has been accounted for in the assessment.
Early morning and evening operational noise periods require specific assessment	The Council notes that the operational noise assessment considers daytime and night-time periods, but does not clearly assess the potential for elevated operational noise during the early morning period, particularly between approximately 04:00 and 07:00 hours. This period may be important for solar inverter operation, as plant output and associated cooling/ventilation noise may begin to increase around sunrise, while background sound levels may remain lower than during the later daytime period. The Applicant should therefore provide an assessment or sensitivity check for the early morning period, using representative background sound levels for this period and operational assumptions that reflect credible plant operation around sunrise. This should include consideration of seasonal variation, particularly during summer months when sunrise occurs before 05:00 hours. The Council also considers that operational noise during the evening period, between 19:00 and 23:00 hours, should be specifically considered in the context of residential amenity. Although this period may fall outside the core daytime assessment period, it is a time when occupants are more likely to be using gardens, opening windows, or undertaking quiet indoor and outdoor activities. Background sound levels may also reduce during this period relative to the daytime. The Applicant should therefore confirm whether the daytime operational assessment is representative of the evening period or provide a separate evening assessment using appropriate representative background sound levels and plant operating assumptions. Where evening or early morning noise levels could be higher relative to background than shown in the current assessment, the operational noise assessment and mitigation strategy should be updated accordingly.
Assumed night-time inverter noise reduction requires evidence	The Council notes that the assessment assumes inverter noise emissions are reduced during the night-time period on the basis that inverter power output would not exceed 20% between 23:00 and 07:00. However, the relationship between electrical output and sound power level has not been justified. Noise from central inverters may be materially influenced by cooling and ventilation systems, which can depend on ambient temperature, thermal load, and control strategy, rather than electrical output alone. The Applicant should justify the assumed night-time sound power levels, including



	evidence that the stated reduction from the 100% load sound power level to the 20% load sound power level is representative of the selected or worst-case equipment. If this cannot be demonstrated, a more conservative night-time operating noise assumption should be assessed.
Operational source data are based on professional experience rather than candidate manufacturer data	The Council notes that the operational noise assessment is based on indicative equipment noise source data and operating assumptions derived from professional experience of similar developments, rather than manufacturer data for candidate plant representative of that proposed. While this may be acceptable for an initial assessment at this stage, the Applicant should demonstrate that the adopted source sound power levels, octave-band spectra, acoustic character assumptions and operating conditions are representative of, or conservative relative to, the plant that could be installed. The Applicant should provide the basis for the assumed source data, including whether the data are derived from measured plant, supplier information, previous project data or generic assumptions. The assessment should also explain how the assumed data relate to credible candidate equipment for the Proposed Development, including inverters, BESS containers, PCS units, transformers and associated cooling/ventilation systems. Where final plant selections are not yet available, the Applicant should commit to a detailed design stage review using manufacturer data for the selected equipment. This review should confirm that the selected plant does not exceed the assessed sound power levels, octave-band spectra and acoustic feature assumptions, including potential tonal or low-frequency characteristics. Any exceedance or material change in source characteristics should trigger an updated operational noise assessment and, where required, additional mitigation secured through the OEMP or relevant DCO requirement.
Central inverter worst-case assumption requires evidence and alternative inverter layouts may need sensitivity testing	The Council notes that the assessment assumes central container inverters represent the reasonable worst-case option, on the basis that these are typically noisier than string inverters. However, this assumption has not been evidenced. The relative noise impact of central and string inverter solutions depends not only on the sound power level of an individual unit, but also on the number of units, their spatial distribution, source height, orientation, cooling strategy, operating regime, tonal characteristics and proximity to noise-sensitive receptors. A greater number of distributed string inverters could, in some circumstances, result in comparable or higher noise levels at particular receptors than a smaller number of central inverter units. The Applicant should therefore provide evidence to demonstrate that the central inverter scenario assessed is genuinely worst-case for all relevant receptors. This should include confirmation of the assumed number, location, sound power levels, acoustic character and operating conditions of the inverter option assessed, and comparison with any credible alternative inverter configuration that could be delivered within the Rochdale Envelope. If it cannot be demonstrated that central inverters are worst-case, the assessment should be updated to include a sensitivity assessment of alternative inverter



	configurations, including distributed string inverter layouts where relevant. The Applicant should also clarify how any alternative technology choice would remain within the assessed Rochdale Envelope. The Council also notes that the operational mitigation described in the ES and outline Operational Environmental Management Plan appears to refer specifically to central container inverters. This implies that the mitigation strategy has been developed around the central inverter option only and may not be directly applicable to a distributed string inverter layout. The Applicant should clarify how embedded mitigation, including minimum separation distances, attenuation requirements, orientation controls and acoustic screening, would apply if string inverters are selected at detailed design. If the mitigation strategy would differ for string inverters, this should be assessed and secured through the detailed operational noise assessment and relevant management plan / DCO requirement.
oCEMP incorrectly presents +5 dB above background as an NPSE criterion	The Council notes that paragraph 1.3.9 of the oCEMP states that the NPSE “stipulates that an increase of +5 dB above prevailing background noise is not likely to be Significant”. This is incorrect. The NPSE does not define numerical noise thresholds, nor does it state that a rating level or increase of +5 dB above background is not likely to be significant. The NPSE sets out policy aims relating to the avoidance of significant adverse effects and the mitigation and minimisation of adverse effects, but it does not prescribe a +5 dB criterion. The +5 dB reference appears to derive from BS 4142, which states that a rating level around 5 dB above the background sound level is likely to indicate an adverse impact, depending on context. It is therefore not appropriate to present +5 dB above background as an NPSE-based threshold below which significant effects are unlikely. A BS 4142 assessment requires consideration of context, including the absolute sound level, the character of the specific sound, the residual sound environment, and receptor sensitivity. The oCEMP should be corrected to distinguish clearly between the NPSE policy aims and the BS 4142 initial assessment guidance. The Applicant should also clarify the operational noise design criterion to be secured through the detailed design and management plans, including how the criterion will avoid significant adverse effects and minimise adverse effects in accordance with the NPSE.
Operational noise compliance mechanism and receptor-specific limits are not clearly secured	The Council notes that neither the oOEMP nor the oCEMP appears to secure clear receptor-specific operational noise limits. The oOEMP includes general operational noise mitigation principles, including separation distances, acoustic barriers and reference to source sound power levels reported in the operational noise assessment; however, it does not define enforceable operational rating level limits at noise-sensitive receptors, nor does it clearly specify the compliance criterion to be achieved following detailed design.



	The Council considers that operational noise controls should be secured through the OEMP and/or an appropriate DCO requirement. These should include receptor-specific operational noise limits or a clearly defined assessment criterion, the plant operating conditions to which the limits apply, any relevant acoustic character corrections and, where relevant, cumulative operational noise. The mechanism should also provide a process for verification through design and post-installation commissioning noise measurements, and set out the actions required if the limits are exceeded, including further mitigation and re-testing. The oOEMP should therefore be updated to include a clear operational noise compliance framework, rather than relying only on general embedded mitigation measures and assumed source sound power levels.
Operational +3 dB acoustic feature correction requires source- and receptor-specific justification	The Council notes that a +3 dB acoustic feature correction has been applied to the operational specific sound levels to account for potential acoustic features. However, the assessment does not provide sufficient justification for the selected correction or explain how each of the relevant BS 4142 acoustic character features has been considered. The Applicant should also clarify whether the +3 dB correction has been applied uniformly to all operational sources and receptors, or to the combined specific sound level at each receptor. The Applicant should provide a clear assessment of whether corrections are required for tonality, impulsivity, intermittency, or other distinctive acoustic characteristics, with reference to the likely characteristics of the proposed plant, including inverters, BESS equipment, PCS units and transformers. The assessment should explain why a single +3 dB correction is appropriate for all relevant plant and receptor locations, or alternatively apply different corrections where the acoustic character is expected to vary by source, operating condition, time period or receptor context. If the +3 dB correction has been applied as a precautionary allowance in the absence of confirmed plant data, this should be clearly stated, and the Applicant should commit to reviewing the acoustic feature correction at detailed design stage once final plant selections and manufacturer octave-band / tonal information are available. Any revised correction should be reflected in the operational noise compliance assessment and secured through the OEMP or relevant DCO requirement.
Inter-cumulative assessment appears to combine rating levels rather than specific sound levels	The Council notes that the inter-cumulative operational noise assessment appears to logarithmically combine rating levels from the Proposed Development and other cumulative schemes. This approach requires further justification. A BS 4142 rating level is not a physical sound level, but the specific sound level with any acoustic feature corrections added. Logarithmically adding rating levels may therefore combine both sound energy and assessment penalties, and could result in double-counting or inconsistent treatment of acoustic character corrections.



	While this approach may be conservative in some circumstances, it does not provide a transparent BS 4142 basis for deriving the cumulative rating level. The Applicant should clarify whether the cumulative calculations have combined specific sound levels or rating levels. Where rating levels have been combined, the Applicant should justify why this is appropriate. The Council considers that the preferred approach would be to logarithmically combine the specific sound levels from the relevant developments, then assess the acoustic character of the combined sound and apply any appropriate BS 4142 character correction to derive a cumulative rating level. The inter-cumulative assessment should be updated or clarified accordingly.
Table 14-30 is unclear in its presentation of Moat Lane cumulative operational noise	The Council considers Table 14-30 to be unclear and requests that it is revised for clarity. The table is titled as an assessment with Moat Lane BESS NE, but it appears to include both Moat Lane BESS NE and Moat Lane BESS HE. In addition, two columns are labelled "Moat Lane BESS NE Rating Level", even though one appears to relate to Moat Lane BESS HE. This makes it unclear which rating levels are attributable to each cumulative scheme and how the total inter-cumulative rating level has been derived. The table also appears to indicate that the total inter-cumulative rating level is controlled almost entirely by one of the Moat Lane BESS schemes, with the Proposed Development making little or no material contribution. If that is the intended conclusion, it should be stated clearly and supported by transparent calculations. The Applicant should revise Table 14-30 to identify each scheme separately, correct the column headings, confirm whether specific sound levels or rating levels have been combined, and show how the total cumulative levels have been calculated.

4.8 Transport

- 4.8.1 Appendix 1 sets out a review of all highway junctions and access points. Concerns were raised at Statutory Consultation stage which have not been addressed and the Council still has concerns over the layout and appropriateness of many of the junctions.

4.9 PROW

- 4.9.1 Appendix 2 of this report provides a technical note which provides commentary on the proposed management of Public Rights of Way (PROW) Network and should be read in conjunction with Appendix 1.

4.10 Air Quality

Construction and Decommissioning Dust

- 4.10.1 Construction dust mitigation measures (excluding demolition) for the highest level of risk from Institute of Air Quality Management (IAQM) guidance have been included as embedded mitigation.



- 4.10.2 The Outline Construction Environmental Management Plan (OCEMP) includes an Outline Dust Management Plan (ODMP) which sets out the measures to mitigate dust and emissions to air during the construction phase of the Scheme. The mitigation measures included in the ODMP are in accordance with those recommended in ES Volume 2 Chapter 12 Air Quality, which are based on the IAQM guidance. A DMP will form part of the CEMP, which will be substantially in accordance with the OCEMP and is secured by Requirement 4 of the Draft DCO. The proposed dust mitigation measures are therefore considered to be sufficient to ensure that potentially significant air quality effects associated with construction dust are not significant.
- 4.10.3 Should any demolition be required during decommissioning, the DMP included in the Decommissioning Environmental Management Plan (DEMP), required by Requirement 13 of the Draft DCO, should include measures to control emissions of dust from demolition activities from the IAQM guidance.

Construction Road Traffic Emissions

Impacts on Human Receptors

- 4.10.4 ES Volume 2 Chapter 12 Air Quality presents an assessment of road traffic emission impacts during the construction phase of the Scheme. The assessment has been undertaken using a screening methodology predominantly based on Environmental Protection UK (EPUK) and IAQM guidance. Whilst the EPUK & IAQM guidance screening criterion of an increase in vehicle movements of more than 200 Heavy Duty Vehicle (HDV) Annual Average Daily Traffic (AADT) for roads outside of Air Quality Management Area (AQMA) is exceeded on one road link (A57 – between Todwick Rd and the M1), it is a marginal exceedance of 15 HDV AADT (total 215 HDV AADT) and nitrogen dioxide (NO₂) concentrations along this road link are likely to be similar to those measured at RMBC diffusion tubes RDT57 and RDT56 which had a measured annual mean NO₂ concentration of <25 µg/m³ in 2022. Therefore, it is agreed that significant air quality impacts are not expected to occur at human receptor locations outside of any AQMA.
- 4.10.5 Three road links with CDC's area are identified as exceeding the EPUK & IAQM screening criterion of an increase in vehicle movements of more than 25 HDV AADT for roads within an AQMA. These road links are A630 High Road, partially within the CDC AQMA No.2 (Warmsworth), A630 and A630 Sheffield Road (between Edlington Lane and Low Road), within CDC AQMA No.5 (Conisbrough). The additional HDV vehicle movements on these road links is 69 AADT.
- 4.10.6 There are no exceedances of the annual mean NO₂ objective at monitoring locations adjacent to or representative of these road links in recent years. The increases in HDV vehicle movements are also below the EPUK & IAQM screening criteria for roads outside of an AQMA of 100 HDV AADT. Therefore, it is agreed that the Scheme is unlikely to give rise to an exceedance of the air quality objectives at human receptor locations, and it is agreed that the air quality effects of the Scheme on human receptors can be considered to be not significant.



- 4.10.7 It is noted, however, that the traffic flows presented in Table 12.12 of Chapter 12 Air Quality differ slightly to those presented in Table 13.17 of Chapter 13 Transport on a number of road links, for example Common Lane, Flash Lane and Cumwell Lane. Whilst these differences are minor and would not affect the conclusions of the assessment presented in Chapter 12 Air Quality, consistent construction traffic flows should be presented across the ES or justification given as to why the traffic flows presented in Table 12.12 of Chapter 12 Air Quality differ to those in Table 13.17 of Chapter 13 Transport.

Impacts on Ecological Receptors

- 4.10.8 ES Volume 2 Chapter 12 Air Quality presents an assessment of air quality impacts on ecological receptors during the construction phase of the Scheme. The assessment has been undertaken using a screening methodology based on DMRB guidance and EPUK & IAQM guidance screening criteria. Air quality effects on ecological receptors within 200m of construction traffic routes are deemed to be not significant on the basis of DMRB and EPUK & IAQM screening criteria applied to the Scheme in isolation. It is agreed that the criteria used are appropriate to screen air quality effects on ecological receptors as a result of the Scheme in-isolation.
- 4.10.9 However, an assessment of the air quality effects of road traffic emissions associated with the Scheme on Protected Sites (SSSIs, SPAs, SACs and Ramsar sites), in-combination with other projects and plans (i.e. inter-project air quality effects), has not been undertaken in accordance with standard advice provided by Natural England (attached to their letter dated 27th October 2025 in response to the Section 42 consultation).
- 4.10.10 Air quality effects resulting from the Scheme on ecological receptors should be reviewed considering the Standard Advice provided by Natural England. The Natural England Standard Advice advises that Joint Nature Conservation Committee (JNCC) Decision Making Thresholds (DMTs) may be used to justify not undertaking an in-combination assessment. It should be noted that the JNCC DMT for road traffic of a 0.15% increase in road traffic compared to the baseline traffic flow, is typically substantially lower than the EPUK & IAQM and DMRB screening thresholds that have been applied to screen out further assessment of air quality effects on SSSIs as a result of the Scheme in-isolation in Chapter 12 of the ES.
- 4.10.11 It is therefore considered that there is insufficient information in the ES to determine the in-combination (inter-project) air quality effects of the Scheme on ecological receptors.

BESS Plume Assessment

- 4.10.12 A BESS Plume Assessment has been undertaken and presents the impact of hydrogen fluoride (HF) emissions on human receptors during a BESS fire event. Whilst there is considerable uncertainty as to the emission rates of pollutants from a BESS fire event, and there is no authoritative guidance on how to quantify emissions or impacts, the purpose of the assessment is to identify the level of risk and given the uncertainties involved it is typical to apply conservative assumptions to ensure the level of



risk is not underestimated and ensure robust procedures are identified in the Outline Battery Safety Management Plan (OBSMP).

- 4.10.13 The ALOHA model software used is not typically applied in the UK, but the fundamentals are considered applicable. However, it is unclear from the BESS Plume Assessment if this has considered worst-case meteorological conditions as the '5th percentile windspeed' has been applied, as opposed to the worst 1-hr. Furthermore, none of the assessed scenarios appear to consider 'stability class F' which would typically be expected to result in the largest impacts.
- 4.10.14 The BESS Plume Assessment states that there are no exceedances of the Acute Exposure Guideline Level 1 (AEGL-1) for HF at any of the modelled residential receptor locations in the single cabinet fire event scenario, however the AEGL-1 for HF is predicted to be exceeded within adjacent farmland and the M1 motorway; no indication is given as to whether the AEGL-2 would be exceeded on the M1 motorway. In the multi-cabinet fire event scenario, the HF AEGL-1 is predicted to be exceeded at receptor location 'R4' – Upper Whiston Farm, as well as adjacent farmland and the M1 motorway; again, no indication is given as to whether the AEGL-2 would be exceeded on the M1 motorway.
- 4.10.15 Public rights of way (PRoW) have not been considered in the assessment. There are two PRoW located within the areas identified as exceeding the HF AEGL-1 and the OBSMP needs to consider this to ensure that appropriate mitigation is identified to avoid air quality impacts on users of the PRoW during a BESS fire event.
- 4.10.16 No assessment has been undertaken of the impact of smoke resulting from a BESS fire on visibility on the M1 motorway and given the exceedances predicted for the HF AEGL-1, there is potential for impacts of other pollutants to occur.
- 4.10.17 It is noted that further assessment will be undertaken at the detailed design stage once the make, model and layout of the BESS are known, in accordance with National Fire Chiefs Council (NFCC) revised guidance, and that this would include a visibility impact assessment on transport links within a 1km radius of the BESS compound. However, given the proximity of the M1 motorway to the BESS compound, visibility impacts on the M1 motorway should be considered at the outline stage to ensure that appropriate mitigation is secured in the OBSMP. Furthermore, the requirement for a detailed BESS plume assessment to inform the final BSMP should be clarified and secured under Requirement 6 of the Draft DCO.

Summary

- 4.10.18 Key issues relating to air quality are summarised below:

- Further information is required on the in-combination effects of construction road traffic emissions associated with the Scheme on Protected Sites, including SSSIs.



- Worst-case meteorological conditions should be considered in the BESS Plume Assessment or justification provided as to how the parameters used provide a robust assessment.
- PRoW should be considered as sensitive receptors in the BESS Plume Assessment and appropriate mitigation secured in the OBSMP to protect users of nearby PRoW from hydrogen fluoride and other relevant pollutant emissions (including but not limited to PM_{2.5}, hydrogen cyanide and carbon monoxide).
- Any predicted exceedances of the Acute Exposure Guideline Level 2 for hydrogen fluoride on the M1 motorway should be reported in the BESS Plume Assessment.
- The impact of smoke from a BESS fire on visibility on the M1 Motorway should be considered in the BESS Plume Assessment and appropriate mitigation measures included in the OBSMP.
- A detailed BESS Plume Assessment should be secured under Requirement 6 of the Draft DCO.

4.11 Ground Conditions

- 4.11.1 Through consultation with the Council and the Mineral Planning Officer, issues raised in relation to construction and operation within Mineral Safeguarding Areas (MSAs) have been addressed with reference to ES Volume 3, Figure 9.4: Mineral Resources [EN0110020/APP/6.19], Table 9.3 and Section 9.7 of the Ground Conditions Chapter.
- 4.11.2 Previously raised issues regarding lack of information in relation to coal mining gas been addressed through inclusion of Coal Mining Risk Assessments (CMRAs) for W1, W2 and W3.
- 4.11.3 Phase 1 Contaminated Land Reports (CLRs), in addition to the now included CMRAs, describe potential for unstable ground conditions and include a preliminary risk assessment (PRA) in relation to land instability, respectively.
- 4.11.4 The CLRs include PRAs for land contamination and baseline information has been incorporated into Section 9.5 of the Chapter. Assessment of effects from land contamination have now been included in Section 9.7, with associated mitigation included in Section 9.6.
- 4.11.5 Hydrogeological conditions (aquifer designations) are now described in the CLRs and details provided in Section 9.5. Assessment of effects is provided in Section 9.7. Risks to groundwater are now considered in the CLRs and the assessment itself, addressing previous concerns from the Environment Agency.
- 4.11.6 The presence of Private Water Supplies has not been addressed in the baseline studies.
- 4.11.7 The use of factual Unexploded Bomb (UXB) risk mapping alone is not considered to be sufficient to characterise the potential Unexploded Ordnance (UXO) risk. The Applicant should provide a non-



technical UXO risk assessment based on CIRIA guidance (Unexploded ordnance (UXO) risk management guide for land-based projects (C785)).

- 4.11.8 The management of unexpected contamination within the oCEMP has been updated and now references relevant procedures/permits and exemptions in regard to soil management.
- 4.11.9 We are pleased that the Study Area has been increased to 250m around the Order Limits, and we agree that this appropriate as it is an unofficial industry standard. Reference to some guidance which quotes this buffer would be beneficial but would not affect the outcome of the assessment.
- 4.11.10 Geological sensitive sites have now been addressed in Section 9.5 of the Chapter.
- 4.11.11 All phases of the Proposed Development are now included with the assessment of effects provided in Section 9.7 and the associated outline Environmental Management Plans for Construction (oCEMP), Operational (oOEMP) and Decommissioning (oDEMP) have been included in the appendices.
- 4.11.12 Fires and firewater have been considered within the oBSMP and adequate mitigation measures are included within the report should water be used as a suppressant to prevent contamination from being released into the environment.
- 4.11.13 No issues have been scoped out of the assessment following consultation, which we agree is appropriate. We note that the CLRs were prepared at an early stage of the design and have not been updated to reflect the final design, but that the assessment presented in the ES Chapter only applies to the final route.

Key Issues and effects

- 4.11.14 On 17 August 2026 the Government published the new National Planning Policy Framework (NPPF), which replaces the 2024 version (updated in 2025) of the NPPF. Understandably, the ES Chapter currently references the 2024 version. Review of the updated NPPF should be undertaken to confirm no significant amendments would be required under the updated version.
- 4.11.15 Receptors listed in paragraph 9.5.133 do not match those identified in Table 9.4. In addition, receptors identified in Table 9.4 only seem to be in relation to contamination and agricultural soil resources. Land stability, mineral resources, and geologically sensitive sites should also be discussed and assessed. In addition, ecological receptors (effects due to mobilisation or introduction of contamination, or from changes to groundwater regime in the case of groundwater dependent terrestrial ecosystems) also have not been mentioned in the assessment.
- 4.11.16 The same applies to magnitudes of impact in Table 9.5, although mineral resources are included there.
- 4.11.17 It is also noted that only three tiers of sensitivity are presented, whereas, although not directly relevant to the proposed development, the National Highways' (formerly Highways England) Design Manual for



Roads and Bridges LA 109 Geology and Soils (2019) represents best practice for geology and soils ES assessment, which presents further tiers such as very high and negligible. Applying these additional tiers may affect the outcome of the assessment of significance.

- 4.11.18 A sensitivity of 'negligible' is used in Table 9.6, however, as discussed above, negligible sensitivity is not defined in Table 9.4. Negligible effects make up almost half of the table. A Minor effect should result from the combination of a High Sensitivity + Negligible Magnitude and a Negligible Sensitivity and a High Magnitude.

Mitigation Measures

- 4.11.19 Mitigation measures presented in the oCEMP, oOEMP, oDEMP, including the outline Site Waste Management Plans (oSWMPs), outline Soil Management Plans (oSMPs), outline Excavated Materials Management Plan (oEMMP) presented within those EMPs, are deemed appropriate in relation to Ground Conditions, along with the outline Battery Safety Management Plan (oBSMP).
- 4.11.20 Although it is reasonable for some of those plans to be presented within the various oEMPs, it would be recommended that when these non-outline documents are prepared for appropriate subsections/routes, these documents are presented under separate covers rather than being included in the various EMPs. This is to allow these documents to be more accessible and easier to be updated throughout the construction, operational, and decommissioning phases.
- 4.11.21 Following future ground investigation works, a Remediation Strategy and Verification Plan should be prepared where necessary.
- 4.11.22 We disagree with the sensitivity part of the assessment, and believe this should be reviewed to reflect the guidance presented in the National Highways' (formerly Highways England) Design Manual for Roads and Bridges LA 109 Geology and Soils (2019), as this is considered best practice for ground conditions and land quality ES chapters, independent of the proposed development type.

4.12 Socio Economic

- 4.12.1 Below sets out comments on the socio economic elements to the proposed development.

Provision of a health summary

- 4.12.2 There has been no health summary prepared as recommended, but health impacts are covered at a high level across various chapters.
- 4.12.3 Chapter 16 (Other Environmental Topics) [6.16] confirms that a standalone assessment for Human Health and Population is scoped out of the EIA. Table 16.1 refers to other chapters in which effects are to be covered. These chapters and the coverage of health issues therein are summarised below:



- Chapter 7 (Landscape and Visual) [6.7] notes that mental health and wellbeing is not specifically assessed in the chapter, recognises that impacts to landscape character/visual amenity may cause mental health issues, and says that these are considered further in Chapter 17 (Cumulative Effects).
- Chapter 12 (Air Quality) [6.12] identifies human health receptors and sensitivities in 12.4 and likely significances of effect in 12.7. Whilst some potentially large magnitude effects are identified, for example in relation to dust impacts during earthworks, it concludes that due to the embedded mitigations in 12.6, potential effects are Not Significant. Moreover, it refers to Chapter 17 (Cumulative Effects).
- Chapter 13 (Traffic and Transport) [6.13] refers to Chapter 17 (Cumulative Effects), acknowledging the potential for combined effects arising from construction phase Traffic and Transport Impacts.
- Chapter 14 (Noise and Vibration) [6.14] assesses health impacts relating to construction and operation noise, and refers to Chapter 17 (Cumulative Effects), acknowledging the potential for combined effects.
- Chapter 17 (Cumulative Effects) intra- and inter- project cumulative effects. With respect to topics not already covered in the chapters above, it provides some elaboration:
 - o The Outline PRoW Management Plan [5.14] is referenced, including steps to maintain access and enjoyment (17.5.7-9).
 - o Steps taken to minimise landscape and associated mental health impacts are outlined (17.5.10-12).

4.12.4 Taken together, the chapters above do assess – albeit at a high level – Human Health impacts, though a health summary has not been prepared.

Further detail on supporting employment opportunities

4.12.5 Chapter 15 (Socio-Economics, Tourism and Recreation, and Land-Use) [6.15] assesses the magnitude of the construction impact on employment as Low, noting (among other things) that ‘*Jobs may be filled by workers from reasonable commuting distances nearby such as Sheffield and Chesterfield*’ (15.7.10).

4.12.6 This is reinforced in 15.7.24-25, which discuss impacts on the tourism sector. The reference to a 17-mile commuting radius is repeated, and it is noted that ‘A small portion of the workforce may travel from further afield and could require temporary accommodation nearby’.

4.12.7 As noted previously, the specialised, national nature of the solar construction workforce casts doubt on the use of a UK average for commuting distance. Detail on how the Proposed Development will



support employment opportunities for local people has still not been provided, and the (unquantified) impact on temporary accommodation is likely to constitute an underestimate.

Exclusion of the West of Maltby

- 4.12.8 The west of Maltby is still not included in the socio-economic study area, despite the order limits extending slightly into it in Figure 15.2 of Chapter 15: Figures [6.19]. This should be reviewed and accounted for at examination stage.

4.13 Agricultural Land Classification

- 4.13.1 The National Planning Policy Framework (NPPF) encourages local authorities to prioritise lower-quality land for development, ensuring the high-quality agricultural land remains available for food production. It is a requirement to consult Natural England where a development proposal affects 20ha or more of Best and Most Versatile (BMV) land, making an Agricultural Land Classification (ALC) survey a necessary step in order to identify the areas of BMV land within the development site boundary.
- 4.13.2 In order to comply with this, the ES includes 6.20 Appendix 9.6: Agricultural Land Classification Report (application document ref. EN0110020/APP/6.20, Revision 01, dated June 2026), produced by Land & Drainage Consultancy (LDC). LDC refer to the report as Soil Resource Assessment and Agricultural Land Classification (ref. LDC_ERM_Whitestone_Solar_ALC_Repot_Rev3_04032026, dated March 2026).
- 4.13.3 6.20 Appendix 9.6 of the ES does not make a distinction between the two council jurisdictions (City of Doncaster Council and Rotherham Metropolitan Borough Council) when assessing the site. The north of the site is within the City of Doncaster Council jurisdiction, whilst the central and southern area of the site is within the Rotherham Metropolitan Borough Council jurisdiction. The boundary between the two Councils is at the point where Common Lane / Moor Lane cross the M18

Adequacy of Survey

- 4.13.4 Although the total site area is 1480ha, the total area included in the survey is 1206.85ha (81% of the total area). This leaves 273.15ha (2,731,500m²) of land un-surveyed (19% of the total area). Paragraph 1.3 of 6.20 Appendix 9.6 states that LDC did not survey the areas of the site subject to connection works, and instead focused only on land proposed for the placement of solar arrays.
- 4.13.5 The issue of insufficient survey coverage has previously been raised by the Planning Inspectorate, as described in Issue ID 3.4.1 in Table 9.1 of (ES 6.9 Chapter 9: Ground Conditions and Land Quality, application document ref. EN0110020/APP/6.9, Revision 01, dated June 2026). Environmental Resources Management (ERM) posited the reasoning that the “trenching works required for the laying of cables would be very short in duration, localised and linear” and that “the land would be reinstated following installation and returned to agricultural use.” Note that while ERM stated in Table 9.1 of 6.9



Chapter 9 that discussion of potential alternatives would be provided in ES 6.4 Chapter 4: Alternatives and Design Evolution, the latest iteration of this document (application document ref.

EN0110020/APP/6.4, Revision 01, dated June 2026) provides no further information and states that “points like ALC have not been considered in detail”, for the reasons previously provided.

- 4.13.6 Paragraph 1.1 of 6.20 Appendix 9.6 states that an approach of a “semi-detailed” survey was requested from LDC by ERM. LDC proceeded with a survey at a frequency of 1 auger per 2 Hectares (ha), upon ERM’s request. However, it is noted that a typical ALC survey is undertaken at a frequency of 1 auger per 1 ha. Whilst this approach can be used for preliminary surveys, at this stage in the planning process, it is considered that a full detailed survey is required to identify the BMV land.
- 4.13.7 Published guidance states that, along with a frequency of 1 auger per 1 hectare, a frequency of 1 trial pit per 10 augers (i.e. 1 trial pit per 10ha) should be employed. This frequency has not been accomplished by the survey, which includes a total of 4 trial pits to cover the 1206.85ha area surveyed (a frequency of 1 pit per 302ha). It is also noted that the 4 trial pits did not target each of the four soil associations expected in the site, as described in Paragraphs 4.8 to 4.11 of 6.20 Appendix 9.6 and shown in Figure 1.

Referenced Guidance

- 4.13.8 Various references to published guidance within Paragraph 3.15 of 6.20 Appendix 9.6 of the ES are outdated. These include:
- 4.13.9 Revised Guidelines and Criteria for Grading the Quality of Agricultural Land, MAFF (1988) has been updated to Agricultural Land Classification of England and Wales Guidelines for grading the quality of agricultural land, Defra Joint Publication 069 (2025). However, the substance of the updated guidance has not been changed from the MAFF 1988 guidance.
- 4.13.10 Soil Survey Field Handbook, Technical Monograph No. 5, Harpenden (1974) is the first edition and has been updated to the fourth edition (2022).
- 4.13.11 Nutrient Management Guide, DEFRA/AHDB (2022) was updated in March 2026. It is noted that this update was published after the commencement of the survey works.
- 4.13.12 Guidance for Successful Reclamation of Mineral and Waste Sites, DEFRA (2004) has been superseded by Guide to reclaiming mineral extraction and landfill sites to agriculture, Natural England (2022).
- 4.13.13 In addition, Guide to Assessing Development Proposals on Agricultural Land, Natural England (2018) has been updated in July 2026 (after the date of issue of 6.20 Appendix 9.6 Revision 01).

Competency



- 4.13.14 It is a requirement that the team producing an ALC is suitably qualified and experienced. While Paragraph 1.4 of 6.20 Appendix 9.6 provides some details of the team's experience and qualifications, the detail provided is not sufficient to meet the requirements set out by the British Society of Soil Sciences (BSSS) Professional Competency Standard (PCS) scheme for ALC.

Grading

- 4.13.15 Paragraph 4.55 of 6.20 Appendix 9.6 states that "it is likely that land is being farmed beyond the slope limitations provided in the 1988 guidelines." While Stantec does not argue this statement, we note that the updated 2025 guidelines elected to retain the slope limitations from the 1988 guidelines for consistency between pre- and post- 2025 ALC surveys.
- 4.13.16 It is noted that the various map series provided as appendices to the 6.20 Appendix 9.6: Agricultural Land Classification Report do not include inset maps. While not a major issue in and of itself, this has resulted in areas of the site being missed from the map series. This affects not insignificant areas of the site within both council jurisdictions. Stantec has made a comparison between the map series and the figures provided in ES 6.19 Chapter 9: Figures (Revision 01, dated June 2026). ES Volume 3 Figure 9.2 ALC Survey Results Sheet 1 of 1 shows that the majority of areas that are missing from the map series provided in 6.20 Appendix 9.6 are classified as ALC subgrade 3b, which is the overruling grade across the site, however an area of ALC subgrade 3a (BMV) is shown near Dinnington (Rotherham Metropolitan Borough Council). This oversight also means that Stantec's review cannot determine the appropriateness of the survey works and available data in the areas not shown.
- 4.13.17 While there is a degree of variation in how the same results may be mapped into ALC grades, Stantec question the choice of ALC Grade 2 along Anston Brook, given the area being within a Flood Zone 3. Additionally, it appears that the individual Grades for each auger have been adhered to in the overall grading of the site. This has resulted in small areas being of different (lower) grades than the surrounding area (higher, typically Subgrade 3b). Typically, these areas of lower grades would merely be incorporated into the surrounding higher grade.

Recommendations

- 4.13.18 While some recommendations are made in Section 5.0 of 6.20 Appendix 9.6, there is a lack of mention of the requirement to consult with Natural England, given the 242.8ha BMV (minimum requirement 20ha).
- 4.13.19 Paragraph 5.6 of 6.20 Appendix 9.6 states that the proposed solar farm scheme "has the potential to create short term impacts", however Stantec note that this temporary period represents a significant period of time; Paragraph 2.5.5 of ES 6.21 Non-Technical Summary (application document ref. EN110020/APP/6.21, Rev 01, dated June 2026) provides an expected operation period of 60 years.



4.14 Arboriculture

- 4.14.1 Comments are provided below in relation to the arboriculture documentation and information received.
- 4.14.2 They relate to a number of issues, including a lack of information on TPOs and Conservation Areas and lack of explanatory text on a number of matters predominantly noting a lack of assessment on the impact on Treeton Woods Ancient Woodland; an irreplaceable habitat adjacent to the Order Limits.

Location	Comment
Appendix 6.14: Arboriculture Survey and Tree Constraints Plan, 3.1.2–3.1.4	The report acknowledges that TPO and Conservation Area searches could not be completed for Rotherham MBC due to a database fault. This matter requires addressing and updating.
Appendix 6.14: Arboriculture Survey and Tree Constraints Plan, 3.1.6–3.1.8	The report confirms no ancient woodland lies within the survey area but identifies Site 6 as immediately adjacent to Treeton Woods Ancient Woodland. This is inconsistent and needs updating. There is also no assessment of the implications of development adjacent to an irreplaceable habitat which needs to be addressed.
Appendix 6.14: Arboriculture Survey and Tree Constraints Plan, 3.1.8	The report notes that ancient woodland is a material planning consideration but does not explain how this has informed the survey recommendations or constraints assessment. Clarification on this matter is required.
Appendix 6.14: Arboriculture Survey and Tree Constraints Plan, 3.2.5	The report identifies Category A trees and groups but does not explain whether any are likely to conflict with the emerging development footprint. As submitted, the significance of these assets is established but the consequences for layout design remain unclear. Updated commentary and evidence on this matter is requested.
Appendix 6.14: Arboriculture Survey and Tree Constraints Plan, 3.2.8	Six Category U trees are identified as having a life expectancy of less than ten years but requiring no immediate works. The basis for this distinction is not fully explained and requires further justification
Appendix 6.14: Arboriculture Survey and Tree Constraints Plan, 3.2.10	The statement that all remaining Category C trees are of "little arboricultural significance" requires justification. Whilst Category C trees are of lower quality than Categories A and B, BS5837 recognises that they may still make a meaningful contribution to landscape character, screening and environmental value. Further assessment and justification on the Category C trees is therefore required.

4.15 Glint and Glare

Legislation, Policy and Guidance

- 4.15.1 The guidance relating to the assessment of glint and glare is outlined within this section. Neo Environmental working alongside Stantec to assess Glint and Glare for the Council agree that there is limited legislation available for glint and glare and all the guidance highlighted within this section is the best guidance available.
- 4.15.2 It should be noted that there is some policy that we would recommend be included within this section. The CAA – CAP738: Safeguarding of Aerodromes 3rd Edition



(<https://www.caa.co.uk/publication/download/12346>) which helps provide advice and guidance to ensure aerodrome safeguarding.

- 4.15.3 As mentioned in the 'Moving Receptors PRow section below, reference to the British Horse Society – Advice on Solar farms near routes used by equestrians should be made as this provides justification for the methodology used.
- 4.15.4 Furthermore, footnote 3 does not work correctly. It should be ensured that the correct link has been provided within the Glint and glare assessment.

Glint and Glare Definitions

- 4.15.5 This section sets out the definitions of glint and glare, whilst also highlighting the type of reflections that are caused off solar panels and that they generally have similar characteristics to that of reflections of bodies of water and other common materials. Neo Environmental agree with these definitions.

Receptors

- 4.15.6 Neo Environmental agree that a 1km study area is sufficient for assessment of ground-based receptors.
- 4.15.7 It is not clear where the non-reflection zones are with the figures that have been provided. Neo Environmental would usually locate the non-reflection zones on each of the ground based receptor figures.
- 4.15.8 Neo Environmental agree that a 1km study area is sufficient for assessment of ground-based receptors.
- 4.15.9 It is not clear where the non-reflection zones are with the figures that have been provided. Neo Environmental would usually locate the non-reflection zones on each of the ground based receptor figures.

Residential Dwellings

- 4.15.10 It is noted that 2m has been used for height within the model, Neo Environmental also use 2m as the height to represent the centre of a ground floor window.
- 4.15.11 A statement is made that a representative dwelling will be used to assess a group of receptors, it is not made clear on the map or in the report where this has occurred. Neo Environmental would expect a residential area to be made clear on the maps to be able to see where a representative receptor has been chosen.



Road and other Ground-Based Transport Receptors

- 4.15.12 The use of 1.5m for receptor height for rail, 2.75m for rail and 2.5m for horse riders is agreed with and is an acceptable approach to assessing road, rail and bridleway receptors. It is noted that receptor routes are placed with analysis every 200m for moving receptors, this is agreed.

Aviation Assets

- 4.15.13 The study areas outlined within this section seem reasonable and fit with industry standards. Whilst they are slightly different from Neo Environmental's, this will not significantly alter the outcome of the Glint and glare assessment.

Consultation

- 4.15.14 This section outlines the consultation undertaken to date on the project and Neo Environmental will leave the response to this section to the relevant consultees.

Assessment Methodology and Impact Criteria

- 4.15.15 This section sets out the methodology and impact criteria used when assessing the potential glint and glare impacts upon receptors. Neo Environmental agree that the SGHAT is an industry standard tool that can be used when assessing Glint and Glare. Neo Environmental note that solar panels now do have an "Anti-Reflective Coating", this may provide a more realistic outcome and likely reduce impacts shown.
- 4.15.16 Neo Environmental agrees with the methodology that 'Roads and streets located within urban environments, with buildings and other infrastructure located in the intervening space between the proposed panels and the road, are not included as any visibility of panels will be screened from view by the buildings.'

Proposed Development Description – Relevant Parameters Considered as part of the Analysis

- 4.15.17 Neo Environmental agrees with the relevant parameters considered as part of the Analysis.

Assumptions, Exclusions and Limitations

- 4.15.18 The assumptions stated are agreed as the model does have limitations which means the model represents an absolute worst-case scenario.

Magnitude of Impact

- 4.15.19 The relevant definitions for green, yellow and red glare are outlined within this section as well as an outline of how the impacts are determined for each receptor.

Static Receptors (Buildings and Residential Receptors)



4.15.20 The limits set out in Table 16.2.1 are agreed with when assessing the impact upon residential receptors. It is assumed that the quantity of glare is related to the quantity of yellow glare only for residential receptors due to the previous statement in paragraph 16.2.44 that outlines there is no specific guidance identifying the magnitude of impact from solar reflections on ground-based static receptors.

Moving Receptors (Road and Rail)

4.15.21 The limits set out for assessing the impacts of road and rail receptors is not agreed with. As stated earlier green glare cannot be categorised as a None impact. The reason behind ignoring green glare on moving receptors needs to be highlighted more effectively with evidence to back up this reasoning. It is of Neo Environmental's view that green glare should be considered for moving receptors due to the potential safety implications, generally green glare would be categorised as a Low impact if done in line with industry standards.

4.15.22 Neo Environmental has concern over the methodology used to assess the magnitude of impact on road receptors. Currently the assessment classifies impacts as 'where yellow or red glare occurs on a Local road, the magnitude of impact will be Low' and 'Where yellow or red glare occurs on a Motorway, major national, national and regional road, as well as on rail receptors, the magnitude of impact will be High.'. The classification of the road in our opinion does not affect the scale of impacts upon the road when looking at roads that do not serve residential dwellings solely. As previously mentioned green glare would be categorised as a Low impact and Yellow Glare impacts on roads should be classified as High due to the safety issue associated with these impacts, if done in line with industry standards.

Moving Receptors (PRoW)

4.15.23 Neo Environmental agrees with the justifications made in paragraphs 16.2.49 and 16.2.50 overall. However, it is advised, as mentioned above, that reference to the British Horse Society (BHS) - Advice on Solar farms near routes used by equestrians be made as this outlines the fact the BHS agree that impacts from a solar farm would not be detrimental to the health or wellbeing of a horse.

Moving Receptors (Aviation)

4.15.24 The limits set out for assessing the impacts of aviation receptors is not agreed with. As stated earlier green glare cannot be categorised as a None impact, it should be noted that Negligible and None are not the same when it comes to impacts. It is clearly outlined with FAA guidance that green glare impacts upon approach is classified as a Low impact and not a None impact. It is of Neo Environmental's view that green glare should be considered for moving receptors due to the potential safety implications, generally green glare would be categorised as a Low impact if done in line with industry standards.

4.15.25 It is also noted that this change is unlikely to materially change the outcome of the assessment.



Air Traffic Control Tower (ATCT)

- 4.15.26 The limits set out are exactly the same as Neo Environmental and therefore these are agreed with when assessing the impact upon ATCT receptors.

Baseline Conditions

Residential Receptors

- 4.15.27 It is noted that receptors north and south of the panels have been ignored due to the fixed frame panels, Neo Environmental would take the approach of outlining the areas where glare is not possible, information surrounding the azimuth that glare can occur and visualisation of the zones of non-reflection to outline which receptors have been scoped out of the assessment for this reason.
- 4.15.28 It is noted that receptors located outside the ZTV have been omitted from assessment, this is an acceptable approach. However, it may be useful to have the ZTV overlaid with the residential receptors, so it is easier to see this for the reader.

Road and Rail Receptors

- 4.15.29 Table 16.2.5 – 16.2.7 outlines the road and rail routes that have been included within the assessment, for the most part Neo Environmental agree with the roads included.
- 4.15.30 However, there are a multitude of roads dissecting the application site which have not been assessed, these roads run adjacent to panels and will potentially have significant impacts, furthermore, the speed of rural roads can reach up to 60mph in some areas which is of significant importance considering the possibility of glare impacting drivers. In our opinion all roads which are connecting roads should be assessed within 1km of the Panel Boundary. The only roads which should be scoped out of the assessment are ones which solely serve residential dwellings as vehicle users of these roads will likely be travelling at low speeds and therefore, there is a negligible risk of safety impacts resulting from glint and glare of the Proposed Development.
- 4.15.31 Route 2 in area W1 has been scoped out of the assessment due to the receptor not being located within the ZTV, however, the Figure 7.4 of the Chapter 7 Figures shows an area of high theoretical visibility across Route 2, therefore, it is our opinion that this route be assessed. It may be useful to have the ZTV overlaid with the road receptors, so it is easier to see this for the reader.

PRoW Receptors

- 4.15.32 Neo Environmental agree with the PRoW receptors that require assessment and it falls in line with the methodology outlined earlier in the report.

Aviation Assets



- 4.15.33 Neo Environmental agree with the aviation receptors that require assessment and it falls in line with the methodology outlined earlier in the report.

Impact Assessment

- 4.15.34 Neo Environmental agree that impacts during operation should be the impacts assessed only.

Residential Receptors

- 4.15.35 Table 16.2.14 – 16.2.16 shows the bald earth glare results for each residential receptor that has been identified as requiring assessment. It can clearly be seen what each impact is for each receptor. The impact classification appears to fall in line with the limits set out earlier in the report. However, there are some small discrepancies with the results as mentioned below;
- 4.15.36 Within Tables 16.2.14 – 16.2.16 the 'Maximum Duration of Glare Per Day in a No-Screening Scenario (in minutes)' will need to be reassessed. It was found for Receptor 32 within area W2 of the Proposed Development that 768 minutes of glare would occur per day, this is approximately 13 hours duration which is highly unlikely. It is thought that this column has been calculated by adding the minutes of impact per day from each array, whereas these impacts would overlap in duration meaning a worst case duration per day is needed.
- 4.15.37 Furthermore, it was found that within Table 16.2.16 Receptor 12 had impacts of 15 minutes maximum duration and 5.5 hours of glare per year with a 'None' magnitude of impact listed. Within Annex A at a degree tilt of 8 degrees Receptor 12 yields 17.5 hours of yellow glare at a worst case, as opposed to the 5.5 hours listed. It is advised to ensure all impacts are correctly outlined within the tables and detailed assessment section to ensure all impacting receptors are assessed as currently Receptor 12 does not appear to have been assessed within the visual assessment.

Road and Rail Receptors

- 4.15.38 Table 16.2.17 – 16.2.19 shows the bald earth glare results for each road receptor that has been identified as requiring assessment. It can clearly be seen what each impact is for each receptor. The impact classification appears to fall in line with the limits set out earlier in the report. However, as stated earlier Neo Environmental do not agree with these impact classifications on safety grounds.

PRoW Receptors

- 4.15.39 Table 16.2.20 – 16.2.22 shows the bald earth glare results for each PRoW receptor that has been identified as requiring assessment. It can clearly be seen what each impact is for each receptor. The impact classification appears to fall in line with the limits set out earlier in the report. Neo Environmental agree with the classifications reached for these impacts.

Aviation Receptors



4.15.40 Table 16.2.23 and 16.2.24 shows the bald earth glare results for each Aviation receptor that has been identified as requiring assessment. It can clearly be seen what each impact is for each receptor. The impact classification appears to fall in line with the limits set out earlier in the report. Neo Environmental agree with the classifications reached for these impacts.

Summary of Bare Earth Glare Analysis

4.15.41 The impacts for each receptor type are summarised within this section of the report. As correctly described, these impacts represent an absolute worst-case scenario. However as mentioned earlier Neo Environmental do not agree with the approach to some of the assessment and some of the impacts yield different results to what is shown in the analysis and so this section of text will likely update as a result.

4.15.42 The reasoning provided for the glare impacts upon the aviation receptors, particularly Netherthope Airfield, offer a reasonable and well laid out argument that is considered to be acceptable. Thus, Neo Environmental agree with the impacts described for aviation receptors.

Embedded Mitigation

4.15.43 It is noted that there are multiple mitigation measures that are proposed as part of the Proposed Development which will help mitigate Glint and Glare impacts. These measures include hedgerows, treelines and opaque fencing to be in place until any propose vegetative measures are grown to a sufficient height.

4.15.44 These measures are welcomed and will likely provide sufficient screening as part of the design to help reduce the potential Glint and Glare impacts down. However, Neo Environmental does not agree with the methodology of the road receptors.

Stage 2 – Detailed Assessment

4.15.45 It is noted that due to the large amount of areas and arrays within the Proposed Development it would be beneficial to list the area of impacts and also the impacting arrays within the residential receptor analysis paragraphs, this would allow for a clear understanding of each impacting array upon the receptor.

Aviation Receptors

4.15.46 Neo Environmental agrees with the justifications set out in paragraph 16.2.373 and 16.2.374, however, it is noted that within paragraph 16.2.374 it states the impact upon this receptor can be classified as None. This contradicts the above where it is stated with ARC coating the impacts reduce to green glare and therefore Neo Environmental would classify these as Low and Acceptable Impacts. Neo Environmental agrees with the information provided in paragraph 16.2.375.



Visual Analysis

- 4.15.47 This section of the report outlines the actual visibility from the receptors into the Proposed Development where the glint and glare impacts are occurring from. It is noted that 'Glint and Glare Modelling' is attached to the report which contains arial images taken from Google Earth, with the aim of showing the real-world potential for impact.
- 4.15.48 However, 'Glint and Glare Modelling' does not offer clear evidence to support the conclusions outlined within this section. It is not clear where the glare is originating from, or how much coverage is provided from the existing vegetation. A diagram showing; the area of the solar farm that has the potential to cause glare upon the receptor, location of the receptor and location where the image is taken would provide a better understanding to determine if the receptors are screened.
- 4.15.49 It is noted that some of the images show extensive tree coverage and have the arial imagery showing the location of potential impacts in some cases, however it would be preferred to have this for each receptor to allow for a better assessment of impacts.
- 4.15.50 The embedded mitigation measures outlined above will also likely screen any glare impacts from the solar farm.

Additional Mitigation

- 4.15.51 Neo Environmental agrees with the additional mitigation proposed.

Stage 3 - Residual Impact Assessment

- 4.15.52 Neo Environmental agrees with the mitigating factors set out in this section regarding the hedgerow planting as part of the outline Landscape and Ecology Management Plan [EN0110020/APP/5.13] and the reflections would occur only during times of direct sunlight as set out in Annex B. Additionally, paragraph 16.2.386 set out mitigating factors surrounding the model assuming the sun is always shining at its fullest intensity and that impacts do not account for different weather conditions that frequently occur that would in reality give rise to lower effects and durations than the worst-case assessment presented, this is also agreed.
- 4.15.53 Neo Environmental agree with the residual impact assessment, however, we would have assessed all roads within the 1km study area and there are some potential issues within the residential impact assessment as outlined previously in the report.

Conclusions

- 4.15.54 The conclusions section provides an overview of the overall assessment and if there were any potential impacts. In this instance there is highlighted to be no High/Medium impact upon dwellings,



roads, rail and aviation. Nothing is mentioned with respect to the impacts upon the upper floor views of residential receptors, Moderate views upon road receptors, Low and High impact views upon PRow's and green glare impacts upon aviation receptors in this section. It should be taken into consideration that any impacts regardless of justification surrounding the magnitude of the impact cannot yield a None impact if there is resulting green, yellow or red glare. It is our opinion that impacts should be labelled as Low in instances where glare is found at an acceptable level. Although Neo Environmental disagrees with some of the methodology, the conclusions found within the summary are mostly agreeable that the site is acceptable with regards to glint and glare. The roads assessment methodology isn't a methodology that we could agree upon as we would consider yellow glare a High impact regardless of the road type. We would suggest that some further changes to the assessment are required so that the assessment has been completed in line with industry standard and best practice. The following points require further information/clarification:

- The zones of none reflection have not been outlined clearly including azimuth angles and discounted receptors.
- Yellow and Green Glare impacts have been discounted on some roads and we would disagree with this.
- Some types of road within the 1km study area have been dismissed, however, we would suggest all roads need to assess excluding roads within built up areas and roads that serve single dwellings.
- The ZTV has not been outlined clearly on the receptor maps to outline which receptors have been discounted due to being outside the zone of theoretical visibility.
- Inclusion of the CAA – CAP738: Safeguarding of Aerodromes 3rd Edition and British Horse Society – Advice on Solar farms near routes used by equestrians would benefit the justifications outlined within the assessment.
- Some of the figures within the tables look to be incorrect, these need to be double checked with the analysis.
- It is difficult to tell the impact or location of some receptors without clearer images, the inclusion of site specific pictures would be beneficial.



5 Development Consent Order

- 5.1.1 Rotherham Metropolitan Borough Council has both a specific interest in articles of the draft development consent order (“DCO”) which affects their statutory functions and a broader interest in ensuring the DCO is well-framed and fit for purpose. Due to the complex nature of statutory instrument drafting, the Council reserves the right to make further detailed representations on the drafting of the DCO at later deadlines, in particular in the LIR and at any ISHs concerned with the DCO.



6 Conclusions

- 6.1.1 As set out within the introduction to this representation, the Council maintains its overall objection to Whitestone Solar Farm proposed development and application as drafted on the basis of its serious strategic concerns relating to the loss of high-quality agricultural land and Green Belt together with the individual and the cumulative impact of the Project on Rotherham's environment, local communities and businesses, when taken together with other major infrastructure proposed in this area.
- 6.1.2 There is a considerable requirement for clarification and further assessment to provide a robust evidence base for the application through the examination process which we will continue liaising with the Applicant on.
- 6.1.3 Where specific technical representations have been made and recommendations suggested, we trust that these will be explored positively, proactively and pragmatically throughout the examination.
- 6.1.4 The Council will continue to assist the ExA through submission of an LIR, participation in hearings and responding to ExA's Questions throughout the examination and welcomes the opportunity to comment further on matters of detail throughout the examination.





Appendix 1 Highways Technical Note



Whitestone Solar Farm - Highway Access Review

Date:

25 August 2026

Prepared for:

Rotherham Metropolitan Borough Council & City of Doncaster Council

Accesses Within Rotherham Metropolitan Borough Council Boundary

Prepared by:

Stantec UK Limited



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Appendix A Technical Note, dated 3 June 2026



1 Introduction

1.1 Background

Stantec UK Limited (Stantec) has been instructed by Rotherham Metropolitan Borough Council (RMBC) and City of Doncaster Council (CDC) to provide multidisciplinary consultation support in relation to the proposed Whitestone Solar Farm Development Consent Order (DCO) application (ref: EN0110020).

It should be noted that this Stantec note exclusively relates to highways and transportation matters within the RMBC authority boundary, specifically the highway access points associated with both the construction and the ongoing operation of the proposed Whitestone Solar Farm.

A total of 53 site access points is proposed for the Whitestone Solar DCO project, spanning mainly both Rotherham and Doncaster local authority boundaries, and one access within Derbyshire County Council local authority boundary. These access points encompass 29 Photo Voltic (PV) area access points and 24 Cable Corridor access points.

The 'Whitestone Solar Farm - Highway Access Review', dated 3 June 2026, included as **Appendix A**, provided comments on 16 proposed access points which were shared prior to the submission of the application. RMBC considered these 16 access points to be problematic as they either possess a reduced visibility splay based on speed survey data, or are subject to a temporary 30mph speed limit. To inform this note, a site visit was undertaken by Stantec on 15 May 2026. All comments provided within the note remain unchanged. This covers the following proposed access points:

- Access LL-01 – Long Lane, Rotherham
- Access LL-02 – Long Lane, Rotherham
- Access GCL-02 – Guilthwaite Common Lane, Rotherham
- Access/Crossing CFL-01 – Field Lane, Rotherham
- Access HHL-03 – Hawk Hill Lane, Rotherham
- Access CC-03 – Bramley Lane, Rotherham
- Access CC-04 – Lidget Lane, Rotherham
- Access CC-05B – Lidget Lane, Rotherham
- Access CC-06 – Sandy Lane, Rotherham
- Access CC-06C – Sandy Lane / Sherbourne Avenue, Rotherham
- Access CC-07 – Morthen Road, Rotherham
- Access CC-08 – Morthen Road, Rotherham
- Crossing CC-18 – Dog Kennels Hill, Rotherham
- Crossing CC-19/20 – Lady Field Road, Rotherham
- Crossing CC-21/22 – Packman Lane, Rotherham
- Crossing CC-23/24 – Manor Road, Rotherham

The purpose of this note is to provide commentary on the 35 remaining proposed access points within the Rotherham Metropolitan Borough Council and Derbyshire County Council local authority boundaries, including any issues that will need to be addressed before each respective proposed access can be considered suitable for either construction or operational traffic. To inform this note, a site visit was undertaken by Stantec on 17 August 2026.



The 35 proposed accesses within the Rotherham Metropolitan Borough Council and Derbyshire County Council local authority boundaries assessed within this note are listed below, split into local authority boundary:

Rotherham Metropolitan Borough Council

- Access SL-01 – Slacks Lane, Rotherham
- Access SL-02 – Slacks Lane, Rotherham
- Crossing SEL-01 – Second Lane, Rotherham
- Access WL-02 – Wood Lane, Rotherham
- Crossing CBL-01 – Brampton Lane, Rotherham
- Crossing CCL-01 – Carr Lane, Rotherham
- Crossing CUL-01 – Ulley Lane, Rotherham
- Access PEHL-02 – Penny Hill Lane, Rotherham
- Access PEHL-03 – Penny Hill Lane, Rotherham
- Access CL-01 – Common Lane, Rotherham
- Access HHL-01 – Hawk Hill Lane, Rotherham
- Access HHL-02 – Hawk Hill Lane, Rotherham
- Access LR-05 – Long Road, Rotherham
- Access CL-03 – Common Lane, Rotherham
- Access EFL-01 – Field Lane, Rotherham
- Access CC-01 – Common Lane, Rotherham/Doncaster
- Access CC-02 – Common Lane, Rotherham
- Access CC-09 – Morthen Lane, Rotherham
- Access CC-10 – Morthen Lane, Rotherham
- Access CC-11 – A618 Pleasley Road, Rotherham
- Access CC-13 – A618 Pleasley Road, Rotherham
- Access CC-14 – A618 Pleasley Road, Rotherham
- Access POHL-02 – Pocket Handkerchief Lane, Rotherham
- Crossing CC-P1 – Private Road off A57 Sheffield Road, Rotherham
- Access SR-03 – A57 Sheffield Road, Rotherham
- Access CC-17A – A57 Sheffield Road, Rotherham
- Crossing CC-P2 – Private Road off Dog Kennels Hill, Rotherham
- Crossing CC-P3 – Private Road off Dog Kennels Hill, Rotherham
- Access CC-25 – Hard Lane, Rotherham
- Access HL-02 – Hard Lane, Rotherham
- Crossing CWL-01 – Walseker Lane, Rotherham
- Crossing CC-26/27 – Woodall Lane, Rotherham
- Access RR-02 – Loverose Way, Rotherham
- Access/Crossing CKL-01 – Killamarsh Lane, Rotherham



Derbyshire County Council

- Access RR-01 – A618 Rotherham Road, Derbyshire

Stantec has also prepared a Public Rights of Way Technical Note, also dated 24 August 2026, which should be read in conjunction with this note.

1.2 Structure of Technical Note

The remainder of this Technical Note is structured as follows:

- **Section 2:** Assessment of accesses proposed within Rotherham Metropolitan Borough Council authority boundary;
- **Section 3:** Assessment of accesses proposed within Derbyshire County Council authority boundary; and
- **Section 4:** Summary and conclusion.



2 Rotherham Metropolitan Borough Council Access Points

2.1 Access SL-01 – Slacks Lane, Rotherham

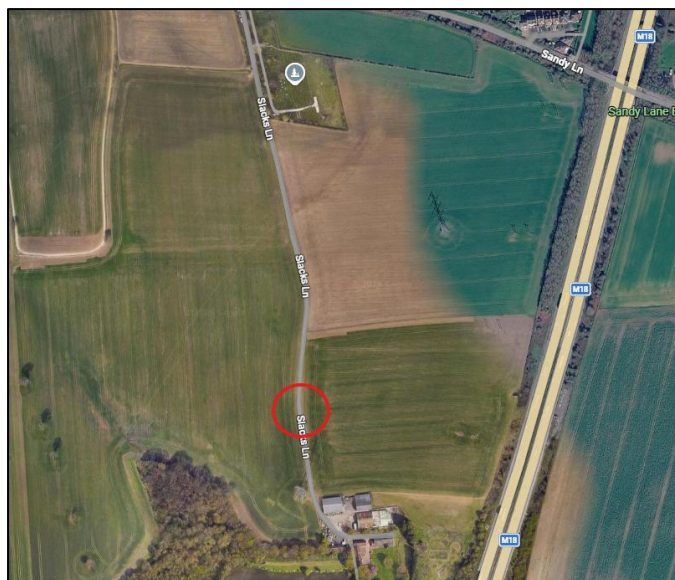


Figure 1: SL-01 Indicative Location

Table 1: SL-01 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	30mph
Applicant's Proposal	
Proposed Visibility Splay	90m to the north and south (DMRB Desirable Minimum SSD compliant for a 30mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	New access along the western highway boundary.
Daily Vehicle Access	Estimated 13 HGVs and 32 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation on the western highway boundary to the south. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with minor horizontal curvature to the north. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.2 Access SL-02 – Slacks Lane, Rotherham

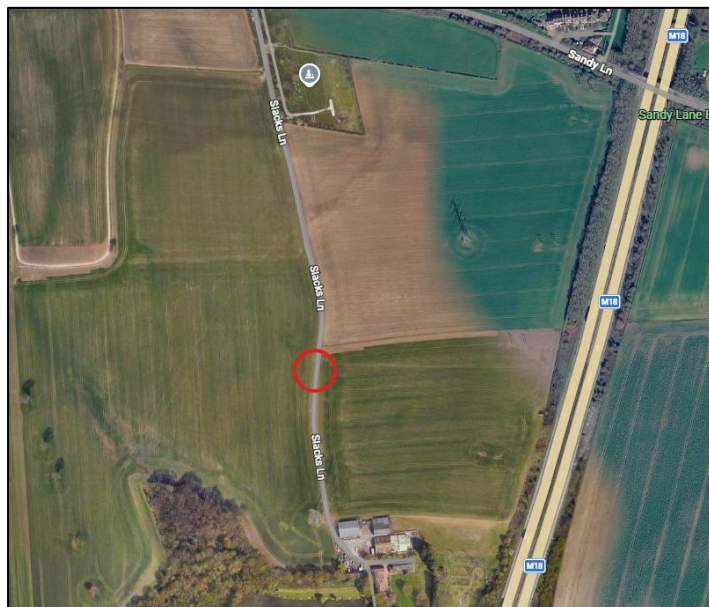


Figure 2: SL-02 Indicative Location

Table 2: SL-02 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	30mph
Applicant's Proposal	
Proposed Visibility Splay	90m to the north and south (DMRB Desirable Minimum SSD compliant for a 30mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	New access along the eastern highway boundary.
Daily Vehicle Access	Estimated 13 HGVs and 32 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation on the eastern highway boundary to the north and south. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with minor horizontal curvature to the north. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Passing Place	A viable passing place will be required along Slacks Lane accounting for the existing width of the carriageway.

2.3 Crossing SEL-01 – Second Lane, Rotherham

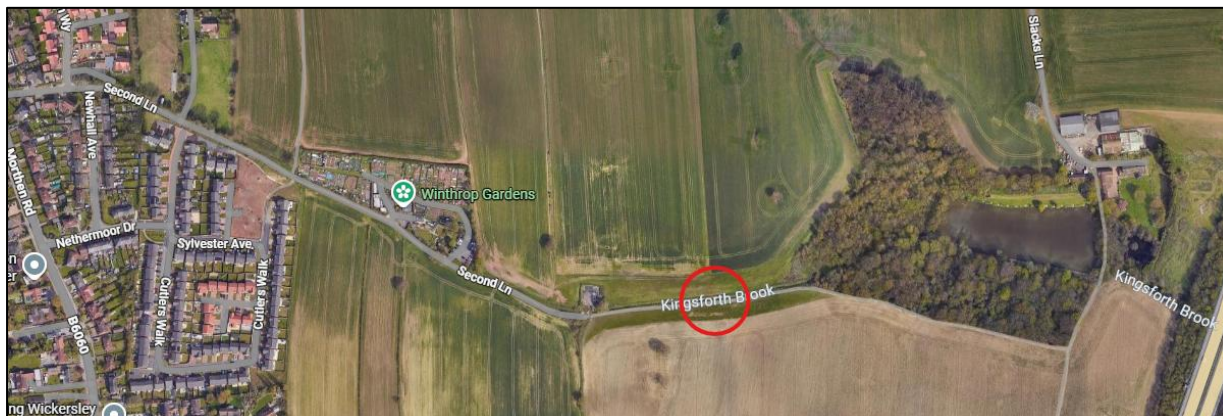


Figure 3: SEL-01 Indicative Location

Table 3: SEL-01 Review

Road Status	
Adopted / Unadopted	Unadopted (Private track)
Speed Limit	Unknown
Applicant's Proposal	
Proposed Visibility Splay Northern Access	90m to the east and west (DMRB Desirable Minimum SSD compliant for a 30mph speed limit)
Proposed Visibility Splay Southern Access	90m to the east and west (DMRB Desirable Minimum SSD compliant for a 30mph speed limit)
Access / Crossing	Crossing (PV Area)
Existing / New Access	New access along the northern and southern highway boundary.
Daily Vehicle Access	Unconfirmed.
Stantec's Comments	
Horizontal Visibility Northern Access	Horizontal visibility is achievable , subject to the minor removal of vegetation on the northern highway boundary to the east and west. Limited Street View imagery is available; however, in the vicinity of the proposed access, the road appears generally straight with no significant horizontal curvature. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility Northern Access	Vertical visibility is achievable . Limited Street View imagery is available; however, in the vicinity of the proposed access, the road appears generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splays have been identified from available imagery.
Horizontal Visibility Southern Access	Horizontal visibility is achievable , subject to the minor removal of vegetation on the southern highway boundary to the east and west. Limited Street View imagery is available; however, in the vicinity of the proposed access, the road appears generally straight with no significant horizontal curvature. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.

Vertical Visibility Southern Access	Vertical visibility is achievable . Limited Street View imagery is available; however, in the vicinity of the proposed access, the road appears generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.
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2.4 Access WL-02 – Wood Lane, Rotherham

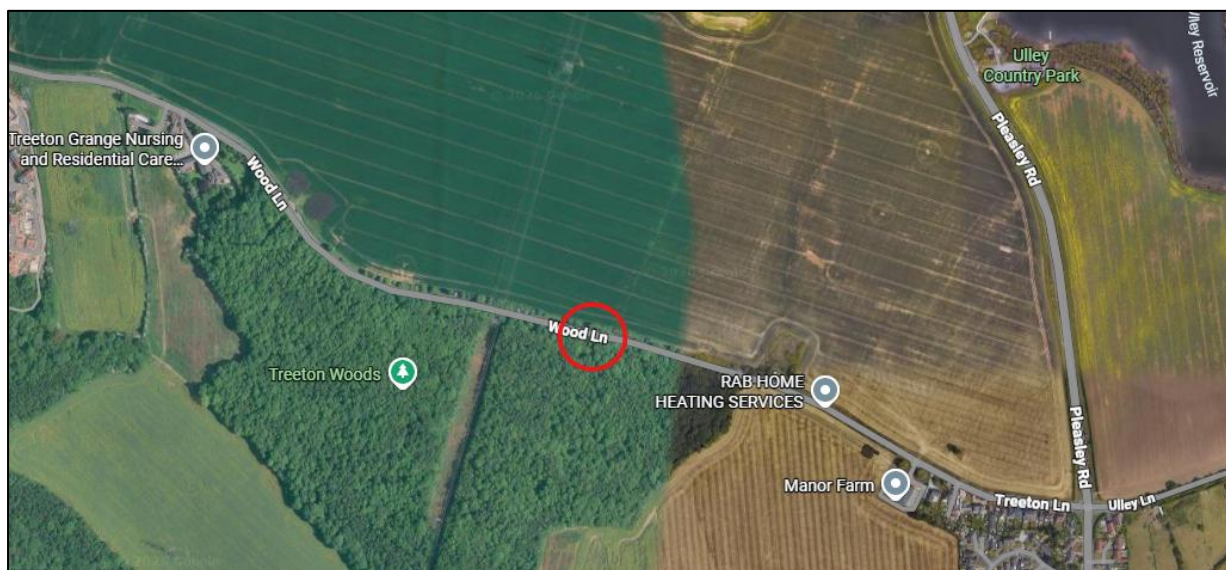


Figure 4: WL-02 Indicative Location

Table 4: WL-02 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	New access along the northern highway boundary.
Daily Vehicle Access	Estimated 6 HGVs and 19 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation on the southern highway boundary to the east and west. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with minor horizontal curvature to the east and west. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.5 Crossing CBL-01 – Brampton Lane, Rotherham



Figure 5: CBL-01 Indicative Location

Table 5: CBL-01 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay Northern Access	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Proposed Visibility Splay Southern Access	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Crossing (PV Area)
Existing / New Access	Existing access along the northern and southern highway boundary.
Daily Vehicle Access	Unconfirmed.
Stantec's Comments	
Horizontal Visibility Northern Access	Horizontal visibility is achievable , subject to the significant removal of vegetation and hedgerow on the northern highway boundary to the west. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with minor horizontal curvature to the east and west. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility Northern Access	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with a minor crest to the west. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

Horizontal Visibility Southern Access	Horizontal visibility is achievable , subject to the significant removal of vegetation and hedgerow on the northern highway boundary to the west and the southern highway boundary to the east. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with minor horizontal curvature to the east and west. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility Southern Access	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with a minor crest to the west. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.6 Crossing CCL-01 – Carr Lane, Rotherham

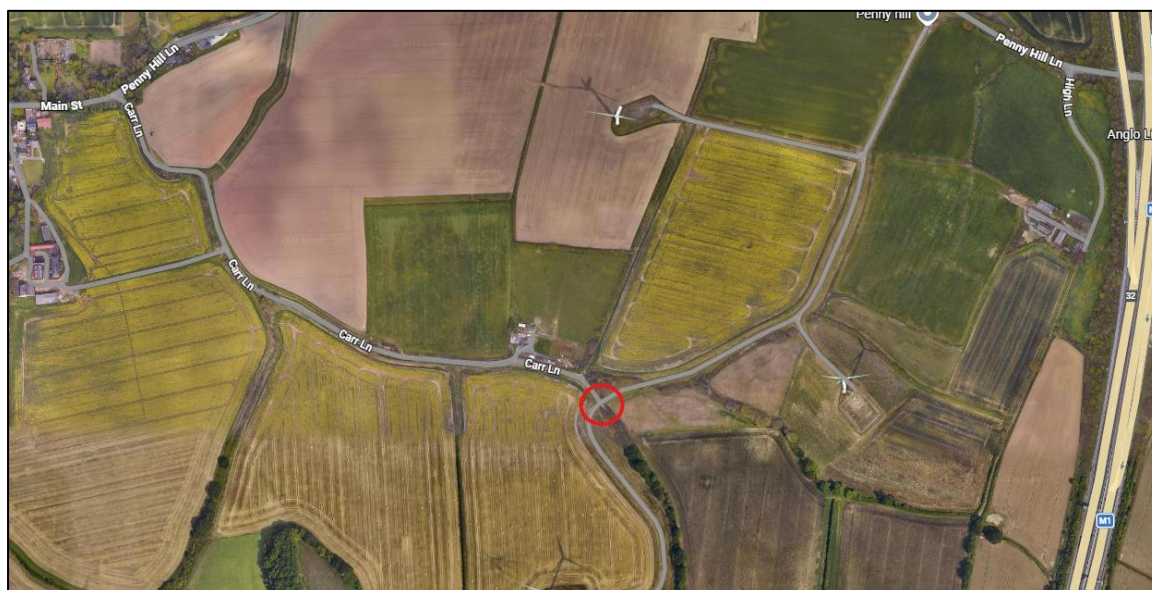


Figure 6: CCL-01 Indicative Location

Table 6: CCL-01 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	30mph
Applicant's Proposal	
Proposed Visibility Splay Eastern Access	90m to the northwest and southeast (DMRB Desirable Minimum SSD compliant for a 30mph speed limit)
Proposed Visibility Splay Western Access	90m to the northwest and southeast (DMRB Desirable Minimum SSD compliant for a 30mph speed limit)
Access / Crossing	Crossing (PV Area)
Existing / New Access	Existing accesses along the eastern and western highway boundary.
Daily Vehicle Access	Unconfirmed.
Stantec's Comments	
Horizontal Visibility Eastern Access	Horizontal visibility is achievable , subject to the moderate removal of vegetation and hedgerow on the eastern highway boundary to the southeast and significant removal of vegetation and hedgerow on the western highway boundary to the northwest. No Street View imagery is available; however aerial imagery indicates that, in the vicinity of the proposed access, the road appears generally curved, with significant horizontal curvature to the northwest. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splay.
Vertical Visibility Eastern Access	Vertical visibility is achievable . No Street View imagery is available. Further to a site visit, it was observed that no vertical constraints to the achievement of the proposed visibility splay are present.

Horizontal Visibility Western Access	Horizontal visibility is achievable , subject to the minor removal of vegetation on the western highway boundary to the southeast and significant removal of vegetation and hedgerow on the western highway boundary to the northwest. No Street View imagery is available; however aerial imagery indicates that, in the vicinity of the proposed access, the road appears generally curved, with significant horizontal curvature to the northwest. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splay.
Vertical Visibility Western Access	Vertical visibility is achievable . No Street View imagery is available. Further to a site visit, it was observed that no vertical constraints to the achievement of the proposed visibility splay are present.

2.7 Crossing CUL-01 – Ulley Lane, Rotherham

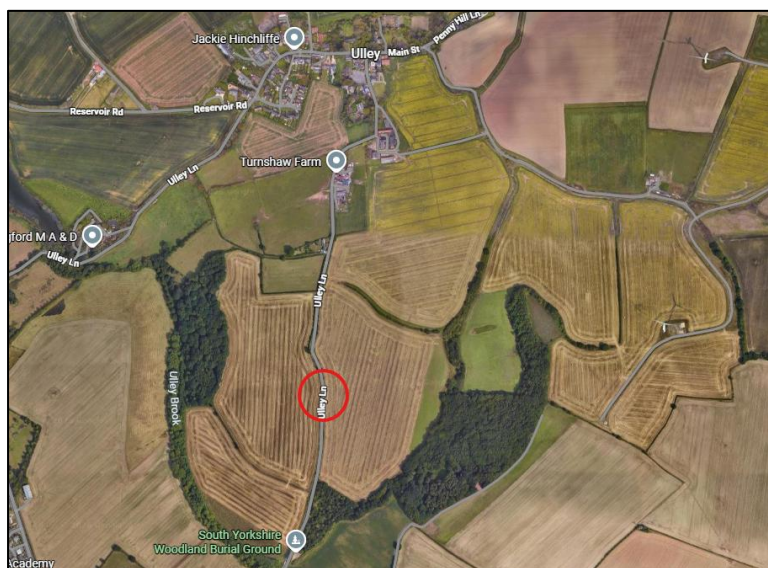


Figure 7: CUL-01 Indicative Location

Table 7: CUL-01 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay Eastern Access	215m to the north and south (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Proposed Visibility Splay Western Access	215m to the north and south (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Crossing (PV Area)
Existing / New Access	New access along the eastern and western highway boundary.
Daily Vehicle Access	Unconfirmed.
Stantec's Comments	
Horizontal Visibility Eastern Access	Horizontal visibility is achievable , subject to the significant removal of vegetation and hedgerow on the eastern highway boundary to the north and minor removal of vegetation and hedgerow on the eastern highway boundary to the south. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally curved with significant horizontal curvature to the north and south. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splay.
Vertical Visibility Eastern Access	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road generally follows a north-south gradient, rising towards the north and falling towards the south, with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

Horizontal Visibility Western Access	Horizontal visibility is achievable , subject to the significant removal of vegetation and hedgerow on the eastern highway boundary to the north and minor removal of vegetation on the western highway boundary to the south. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally curved with significant horizontal curvature to the north and south. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splay.
Vertical Visibility Western Access	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road generally follows a north-south gradient, rising towards the north and falling towards the south, with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.8 Access PEHL-02 – Penny Hill Lane, Rotherham

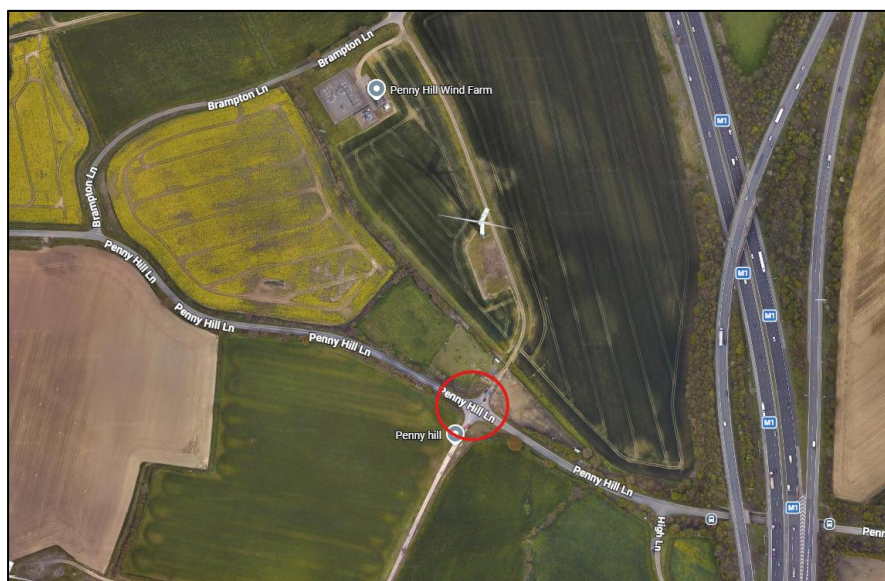


Figure 8: PEHL-02 Indicative Location

Table 8: PEHL-02 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	Existing access along the northern highway boundary.
Daily Vehicle Access	Estimated 7 HGVs and 22 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the significant removal of vegetation and hedgerow on the northern highway boundary to the east and the southern highway boundary to the west. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally curved with moderate horizontal curvature to the east and west. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splay.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.9 Access PEHL-03 – Penny Hill Lane, Rotherham

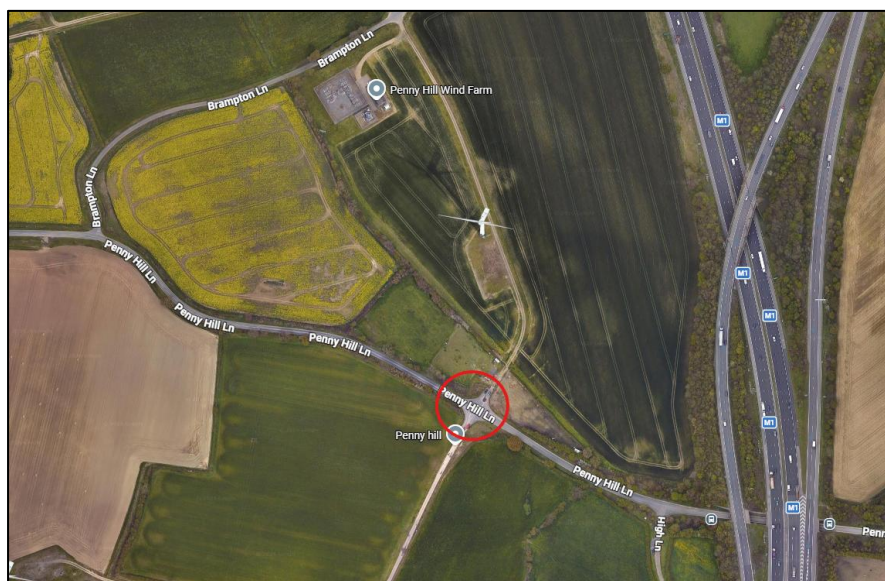


Figure 9: PEHL-03 Indicative Location

Table 9: PEHL-03 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	Existing access along the southern highway boundary.
Daily Vehicle Access	Estimated 9 HGVs and 26 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation on the northern highway boundary to the east and the significant removal of vegetation and hedgerow on the southern highway boundary to the west. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally curved with moderate horizontal curvature to the east and west. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splay.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.10 Access CL-01 – Common Lane, Rotherham

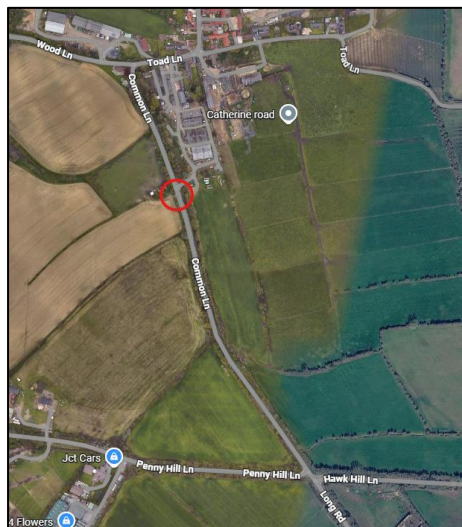


Figure 10: CL-01 Indicative Location

Table 10: CL-01 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the north and south (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	Existing access along the western highway boundary.
Daily Vehicle Access	Estimated 6 HGVs and 21 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation and hedgerow on the western highway boundary to the south and the moderate removal of vegetation and hedgerow on the western highway boundary to the north. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with no significant horizontal curvature. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present.
Vertical Visibility	Vertical visibility to the north is achievable . However, further to a site visit, it was observed that vertical visibility to the south is not achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road generally follows a north-south gradient, falling towards the north and rising towards the south, with a notable blind crest located to the south.

2.11 Access HHL-01 – Hawk Hill Lane, Rotherham



Figure 11: HHL-01 Indicative Location

Table 11: HHL-01 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	Existing access along the northern highway boundary.
Daily Vehicle Access	Estimated 6 HGVs and 21 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation and hedgerow on the northern highway boundary to the west and the moderate removal of vegetation and hedgerow on the southern highway boundary to the east. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally curved, with significant horizontal curvature to the east and west. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splay.
Vertical Visibility	Vertical visibility to the west is achievable . However, further to a site visit, it was observed that vertical visibility to the east is not achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with a notable blind crest located to the east.

2.12 Access HHL-02 – Hawk Hill Lane, Rotherham



Figure 12: HHL-02 Indicative Location

Table 12: HHL-02 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	Existing access along the southern highway boundary.
Daily Vehicle Access	Estimated 6 HGVs and 21 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the significant removal of vegetation and hedgerow on the southern highway boundary to the east and the northern highway boundary to the west. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally curved with significant horizontal curvature to the east and west. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splay.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. Further to a site visit, it was observed that no vertical constraints to the achievement of the proposed visibility splay are present.

2.13 Access LR-05 – Long Road, Rotherham



Figure 13: LR-05 Indicative Location

Table 13: LR-05 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the north and south (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	Existing access along the western highway boundary.
Daily Vehicle Access	Estimated 16 HGVs and 35 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation and hedgerow on the western highway boundary to the north and south. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with no significant horizontal curvature. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.14 Access CL-03 – Common Lane, Rotherham

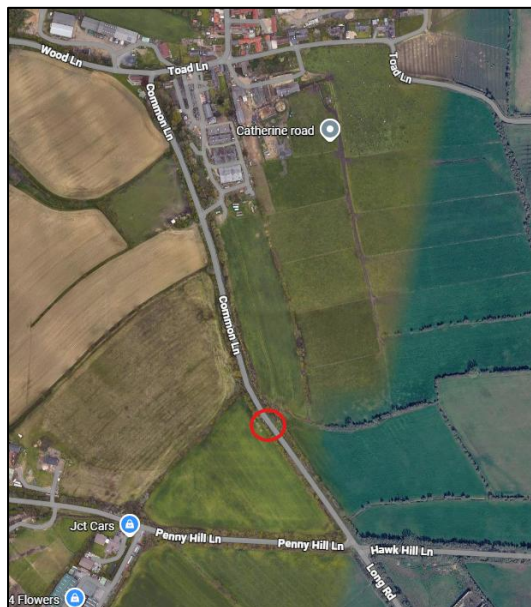


Figure 14: CL-03 Indicative Location

Table 14: CL-03 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the north and south (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	Existing access along the western highway boundary.
Daily Vehicle Access	Estimated 14 HGVs and 33 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation on the eastern highway boundary to the north and the moderate removal of vegetation and hedgerow on the western highway boundary to the south. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight to the south, with minor horizontal curvature to the north. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. Further to a site visit, it was observed that no vertical constraints to the achievement of the proposed visibility splay are present.

2.15 Access EFL-01 – Field Lane, Rotherham



Figure 15: EFL-01 Indicative Location

Table 15: EFL-01 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	Existing access along the northern highway boundary.
Daily Vehicle Access	Unconfirmed.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the moderate removal of vegetation and hedgerow on the northern highway boundary to the west and the significant removal of vegetation and hedgerow on the northern highway boundary to the east. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight to the west, with significant horizontal curvature to the east. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splays.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.16 Access CC-01 – Common Lane, Rotherham/Doncaster



Figure 16: CC-01 Indicative Location

Table 16: CC-01 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (Cable Corridor Area)
Existing / New Access	Existing access along the northern highway boundary.
Daily Vehicle Access	Estimated 28 HGVs and 42 staff vehicles.
Stantec's Comments	
Note	Common Lane is within RMBC authority boundary, but the access extending north is in DCC authority boundary.
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation on the northern highway boundary to the east and west. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with no significant horizontal curvature. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.17 Access CC-02 – Common Lane, Rotherham



Figure 17: CC-02 Indicative Location

Table 17: CC-02 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (Cable Corridor Area)
Existing / New Access	Existing access along the southern highway boundary.
Daily Vehicle Access	Estimated 4 HGVs and 6 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation and hedgerow on the southern highway boundary to the east and west. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with no significant horizontal curvature. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.18 Access CC-09 – Morthen Lane, Rotherham



Figure 18: CC-09 Indicative Location

Table 18: CC-09 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (Cable Corridor Area)
Existing / New Access	Existing access along the northern highway boundary.
Daily Vehicle Access	Estimated 14 HGVs and 20 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation on the northern highway boundary to the west and the moderate removal of vegetation and hedgerow on the northern highway boundary to the east. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight to the west, with minor horizontal curvature to the east. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.19 Access CC-10 – Morthen Lane, Rotherham



Figure 19: CC-10 Indicative Location

Table 19: CC-10 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (Cable Corridor Area)
Existing / New Access	Existing access along the southern highway boundary.
Daily Vehicle Access	Estimated 46 HGVs and 70 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation on the southern highway boundary to the east and the minor removal of vegetation and hedgerow on the southern highway boundary to the west. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight to the west, with minor horizontal curvature to the east. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.20 Access CC-11 – A618 Pleasley Road, Rotherham

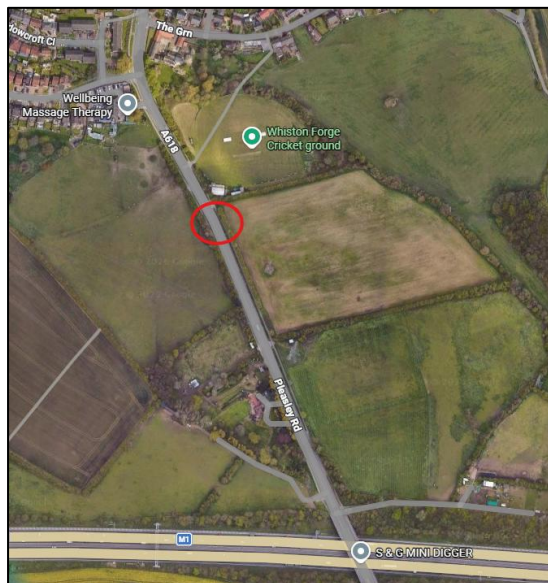


Figure 20: CC-11 Indicative Location

Table 20: CC-11 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	50mph
Applicant's Proposal	
Proposed Visibility Splay	160m to the north and south (DMRB Desirable Minimum SSD compliant for a 50mph speed limit)
Access / Crossing	Access (Cable Corridor Area)
Existing / New Access	New access required along the eastern highway boundary.
Daily Vehicle Access	Estimated 6 HGVs and 10 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation on the eastern highway boundary to the north and south. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight to the south, with minor horizontal curvature to the north. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present.
Vertical Visibility	Vertical visibility to the north is achievable. However, further to a site visit, it was observed that vertical visibility to the south is not achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road generally follows a north-south gradient, falling towards the north and rising towards the south, with a notable blind crest located to the south.

2.21 Access CC-13 – A618 Pleasley Road, Rotherham

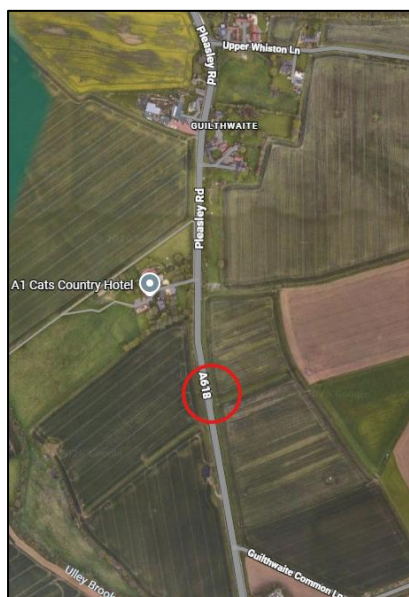


Figure 21: CC-13 Indicative Location

Table 21: CC-13 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the north and south (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (Cable Corridor Area)
Existing / New Access	New access along the eastern highway boundary.
Daily Vehicle Access	Estimated 18 HGVs and 26 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation on the western highway boundary to the south and moderate removal of vegetation and hedgerow on the western highway boundary to the north. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight to the south, with moderate horizontal curvature to the north. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splay.
Vertical Visibility	Vertical visibility to the north is achievable . However, further to a site visit, it was observed that vertical visibility to the south is not achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road generally follows a north-south gradient, falling towards the north and rising towards the south, with a notable blind crest located to the south.

2.22 Access CC-14 – A618 Pleasley Road, Rotherham

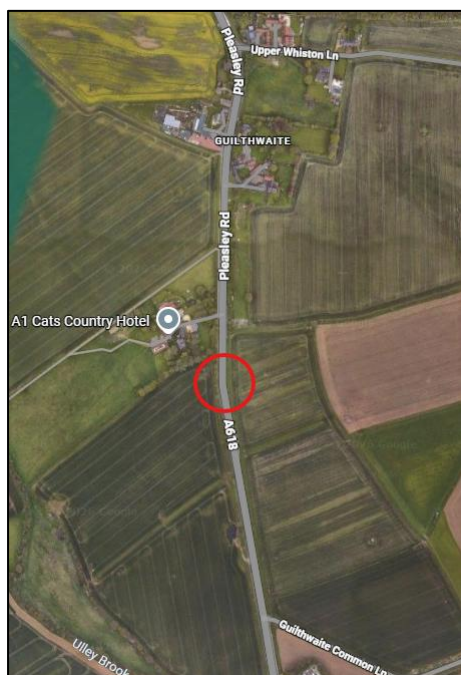


Figure 22: CC-14 Indicative Location

Table 22: CC-14 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the north and south (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (Cable Corridor Area)
Existing / New Access	New access along the western highway boundary.
Daily Vehicle Access	Estimated 24 HGVs and 36 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation on the western highway boundary to the north and south. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with no significant horizontal curvature. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road generally follows a north-south gradient, falling towards the north and rising towards the south, with a notable crest located to the south. Further to a site visit, it was observed that no vertical constraints to the achievement of the proposed visibility splay are present.

2.23 Access POHL-02 – Pocket Handkerchief Lane, Rotherham

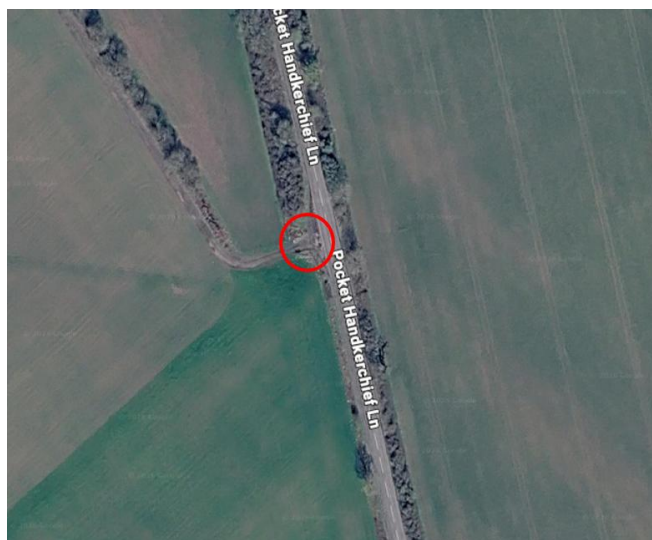


Figure 23: POHL-02 Indicative Location

Table 23: POHL-02 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the north (DMRB Desirable Minimum SSD compliant for a 60mph speed limit) 206m to the south (limited to junction with B6463 Todwick Road)
Access / Crossing	Access (PV Area)
Existing / New Access	Existing access along the western highway boundary.
Daily Vehicle Access	Estimated 12 HGVs and 29 staff vehicles
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation and hedgerow on the western highway boundary to the north and south. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight, with no significant horizontal curvature. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery. A speed survey is required to the south of the access to determine if lower vehicle speeds are recorded, justifying a visibility splay below 215m.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.24 Crossing CC-P1 – Private Road off A57 Sheffield Road, Rotherham

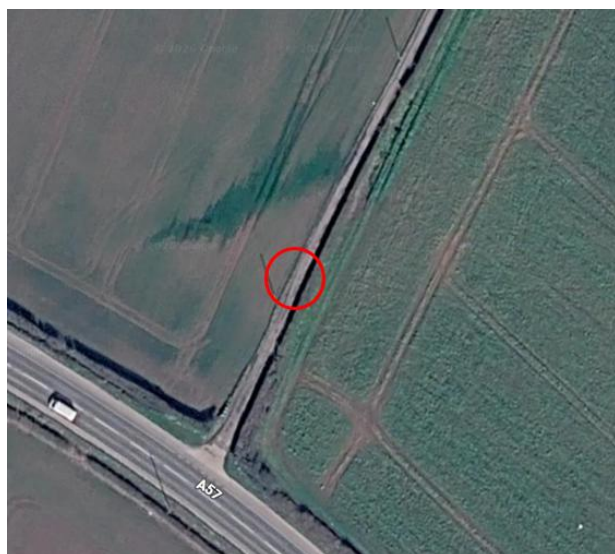


Figure 24: CC-P1 Indicative Location

Table 24: CC-P1 Review

Road Status	
Adopted / Unadopted	Unadopted (private road)
Speed Limit	Unknown
Applicant's Proposal	
Proposed Visibility Splay Eastern Access	90m to the north (DMRB Desirable Minimum SSD compliant for a 30mph speed limit) 87m to the south (limited to junction with A57 Sheffield Road)
Proposed Visibility Splay Western Access	90m to the north (DMRB Desirable Minimum SSD compliant for a 30mph speed limit) 86m to the south (limited to junction with A57 Sheffield Road)
Access / Crossing	Crossing (Cable Corridor Area)
Existing / New Access	New access along the eastern and western highway boundary.
Daily Vehicle Access	Unconfirmed
Stantec's Comments	
Horizontal Visibility Eastern Access	Horizontal visibility is achievable , subject to the moderate removal of vegetation and hedgerow on the eastern highway boundary to the north and south. Limited Street View imagery is available; however, in the vicinity of the proposed access, the road appears generally straight with no significant horizontal curvature. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility Eastern Access	Vertical visibility is achievable . Limited Street View imagery is available; however, in the vicinity of the proposed access, the road appears generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

Horizontal Visibility Western Access	Horizontal visibility is achievable , subject to the moderate removal of vegetation on the western highway boundary to the north and south. Limited Street View imagery is available; however, in the vicinity of the proposed access, the road appears generally straight with no significant horizontal curvature. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility Western Access	Vertical visibility is achievable . Limited Street View imagery is available; however, in the vicinity of the proposed access, the road appears generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

Note: On the proposed access drawing, the eastern access is labelled as the western access and the western access is labelled as the eastern access.

2.25 Access SR-03 – A57 Sheffield Road, Rotherham



Figure 25: SR-03 Indicative Location

Table 25: SR-03 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	50mph
Applicant's Proposal	
Proposed Visibility Splay	160m to the east and west (DMRB Desirable Minimum SSD compliant for a 50mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	Existing access along the northern highway boundary.
Daily Vehicle Access	Estimated 24 HGVs and 47 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of hedgerow on the northern highway boundary. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight, with minor horizontal curvature to the east and west. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.26 Access CC-17A – A57 Sheffield Road, Rotherham



Figure 26: CC-17A Indicative Location

Table 26: CC-17A Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	50mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (Cable Corridor Area)
Existing / New Access	New access along the southern highway boundary
Daily Vehicle Access	Estimated 36 HGVs and 54 staff vehicles
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation and hedgerow on the southern highway boundary to the east and west. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight, with no significant horizontal curvature. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery. Visibility splay could be reduced to 2.4m x 160m, which is DMRB Desirable Minimum for a 50mph road.
Vertical Visibility	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. No vertical constraints to the achievement of the proposed visibility splay have been identified from available imagery.

2.27 Crossing CC-P2 – Private Road off Dog Kennels Hill, Rotherham

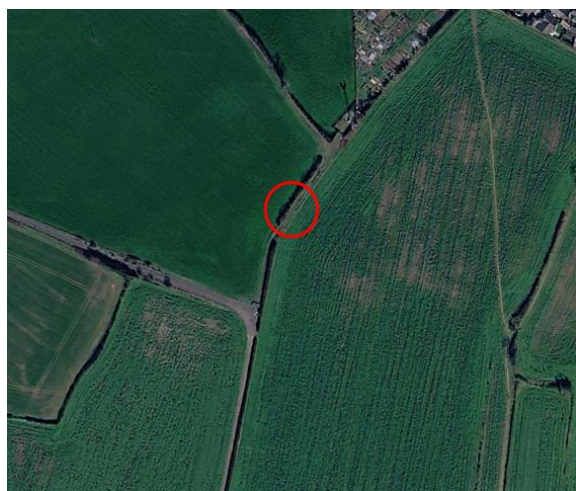


Figure 27: CC-P2 Indicative Location

Table 27: CC-P2 Review

Road Status	
Adopted / Unadopted	Unadopted (private road with gated accesses from Dog Kennels Hill)
Speed Limit	Unknown
Applicant's Proposal	
Proposed Visibility Splay Eastern Access	90m to the north (DMRB Desirable Minimum SSD compliant for a 30mph speed limit) 57m to the south (limited to junction with private road)
Proposed Visibility Splay Western Access	90m to the north (DMRB Desirable Minimum SSD compliant for a 30mph speed limit) 60m to the south (limited to junction with private road)
Access / Crossing	Crossing (Cable Corridor Area)
Existing / New Access	New access along the eastern and western highway boundary.
Daily Vehicle Access	Unconfirmed
Stantec's Comments	
Horizontal Visibility Eastern Access	Horizontal visibility is achievable , subject to the significant removal of vegetation and hedgerow on the eastern highway boundary to the south and western highway boundary to the north. No Street View imagery is available; however aerial imagery indicates that, in the vicinity of the proposed access, the road appears generally curved, with moderate horizontal curvature to the south and significant horizontal curvature to the north. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splay.

Vertical Visibility Eastern Access	It is unknown if vertical visibility is achievable. No Street View imagery is available. The proposed crossing is located on an unadopted private road with gated accesses from Dog Kennels Hill.
Horizontal Visibility Western Access	Horizontal visibility is achievable , subject to the significant removal of vegetation and hedgerow on the western highway boundary to the north and minor removal of vegetation on the western highway boundary to the south. No Street View imagery is available; however aerial imagery indicates that, in the vicinity of the proposed access, the road appears generally curved, with moderate horizontal curvature to the south and significant horizontal curvature to the north. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splay.
Vertical Visibility Western Access	It is unknown if vertical visibility is achievable. No Street View imagery is available. The proposed crossing is located on an unadopted private road with gated accesses from Dog Kennels Hill.

Note: On the proposed access drawing, the eastern access is labelled as the southern access and the western access is labelled as the northern access.

2.28 Crossing CC-P3 – Private Road off Dog Kennels Hill, Rotherham

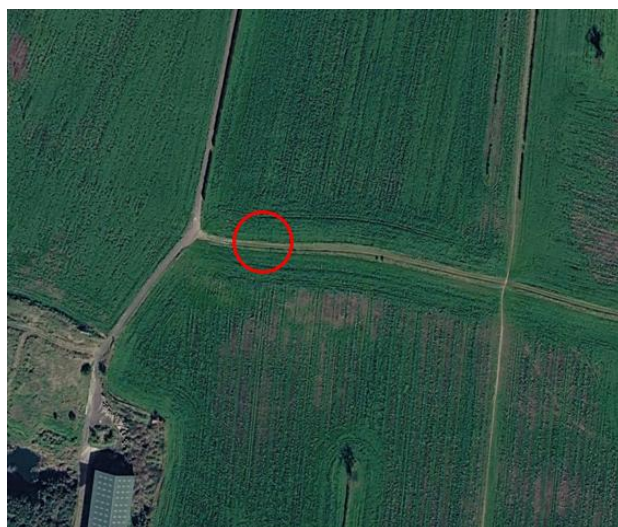


Figure 28: CC-P3 Indicative Location

Table 28: CC-P3 Review

Road Status	
Adopted / Unadopted	Unadopted (private road with gated accesses from Dog Kennels Hill)
Speed Limit	Unknown
Applicant's Proposal	
Proposed Visibility Splay Northern Access	90m to the east (DMRB Desirable Minimum SSD compliant for a 30mph speed limit) 45m to the west on northern highway boundary (limited to junction with private road)
Proposed Visibility Splay Southern Access	90m to the east (DMRB Desirable Minimum SSD compliant for a 30mph speed limit) 46m to the west on southern highway boundary (limited by junction with private road)
Access / Crossing	Crossing (Cable Corridor Area)
Existing / New Access	New access along the northern and southern highway boundary.
Daily Vehicle Access	Unconfirmed
Stantec's Comments	
Horizontal Visibility Northern Access	Horizontal visibility is achievable , subject to the minor removal of vegetation on the northern highway boundary to the east and west. No Street View imagery is available; however aerial imagery indicates that, in the vicinity of the proposed access, the road appears generally straight, with no significant horizontal curvature. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility Northern Access	It is unknown if vertical visibility is achievable. No Street View imagery is available. The proposed crossing is located on an unadopted private road with gated accesses from Dog Kennels Hill.

Horizontal Visibility Southern Access	Horizontal visibility is achievable , subject to the minor removal of vegetation on the southern highway boundary to the east and west. No Street View imagery is available; however aerial imagery indicates that, in the vicinity of the proposed access, the road appears generally straight, with no significant horizontal curvature. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility Southern Access	It is unknown if vertical visibility is achievable. No Street View imagery is available. The proposed crossing is located on an unadopted private road with gated accesses from Dog Kennels Hill.

2.29 Access CC-25 – Hard Lane, Rotherham

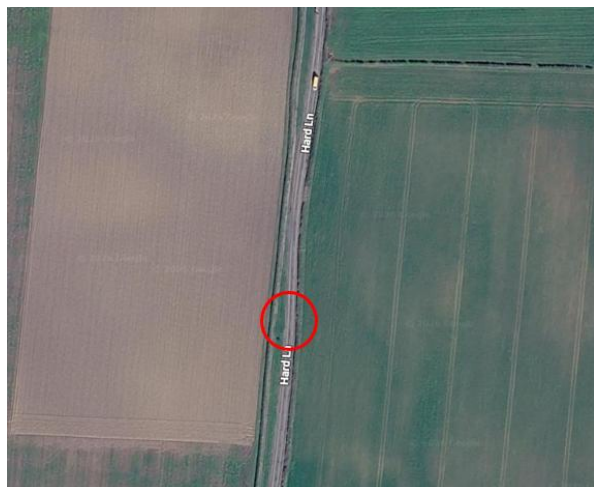


Figure 29: CC-25 Indicative Location

Table 29: CC-25 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the north and south (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (Cable Corridor Access)
Existing / New Access	New access along the eastern highway boundary.
Daily Vehicle Access	Estimated 44 HGVs and 66 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation and hedgerow on the eastern highway boundary to the north and south. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with no significant horizontal curvature. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present.
Vertical Visibility	Vertical visibility to the south is achievable . However, further to a site visit, it was observed that vertical visibility to the north is not achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road generally follows a north-south gradient, falling towards the south and rising towards the north, with a notable blind crest located to the north.

2.30 Access HL-02 – Hard Lane, Rotherham

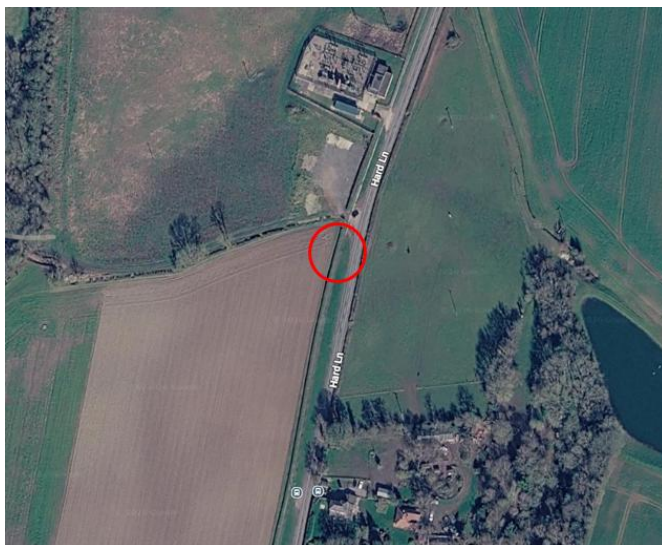


Figure 30: HL-02 Indicative Location

Table 30: HL-02 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay	215m to the north and south (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	New access along the western highway boundary
Daily Vehicle Access	Estimated 27 HGVs and 59 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation on the eastern highway boundary to the south. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with no significant horizontal curvature. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present.
Vertical Visibility	Vertical visibility to the north is achievable . However, further to a site visit, it was observed that vertical visibility to the south is not achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road generally follows a north-south gradient, falling towards the north and rising towards the south, with a notable blind crest located to the south.

2.31 Crossing CWL-01 – Walseker Lane, Rotherham



Figure 31: CWL-01 Indicative Location

Table 31: CWL-01 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	30mph (no speed limit signs - assumed, as road continues from a residential area)
Applicant's Proposal	
Proposed Visibility Splay Eastern Access	90m to the north and south (DMRB Desirable Minimum SSD compliant for a 30mph speed limit)
Proposed Visibility Splay Western Access	90m to the north and south (DMRB Desirable Minimum SSD compliant for a 30mph speed limit)
Access / Crossing	Crossing (PV Area)
Existing / New Access	New access along the eastern and western highway boundary.
Daily Vehicle Access	Unconfirmed
Stantec's Comments	
Horizontal Visibility Eastern Access	Horizontal visibility is achievable , subject to the moderate removal of vegetation and hedgerow on the eastern highway boundary to the north and south. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with no significant horizontal curvature. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present.
Vertical Visibility Eastern Access	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. Further to a site visit, it was observed that no vertical constraints to the achievement of the proposed visibility splay are present.

Horizontal Visibility Western Access	Horizontal visibility is achievable , subject to the moderate removal of vegetation and hedgerow on the western highway boundary to the north and south. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with no significant horizontal curvature. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present.
Vertical Visibility Western Access	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road is generally level with no significant crests. Further to a site visit, it was observed that no vertical constraints to the achievement of the proposed visibility splay are present.

2.32 Crossing CC-26/27 – Woodall Lane, Rotherham

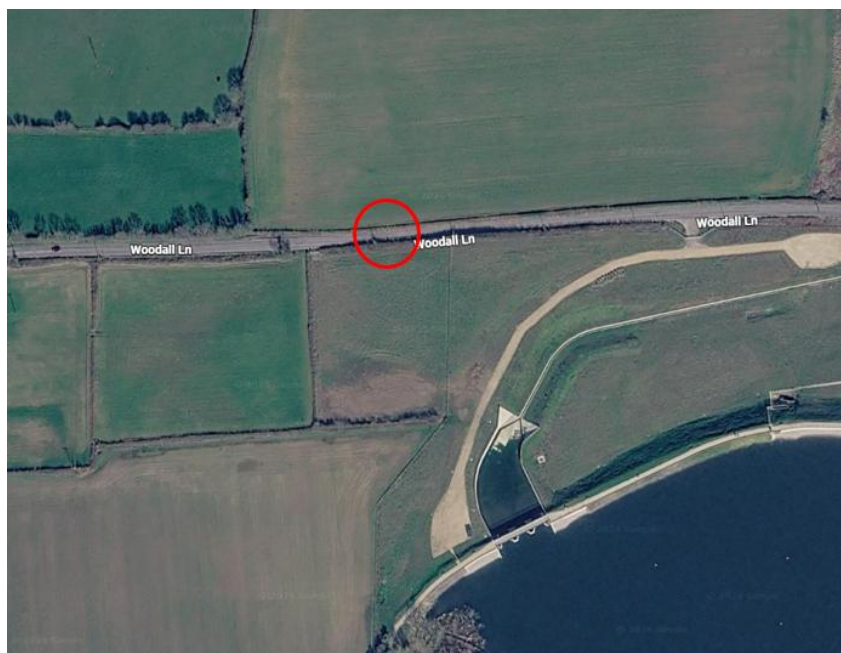


Figure 32: CC-26/27 Indicative Location

Table 32: CC-26/27 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay Northern Access	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Proposed Visibility Splay Southern Access	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Crossing (Cable Corridor Area)
Existing / New Access	New access along the northern and southern highway boundary.
Daily Vehicle Access	Unconfirmed
Stantec's Comments	
Horizontal Visibility Northern Access	Horizontal visibility is achievable , subject to the moderate removal of vegetation and hedgerow on the northern highway boundary to the east and west. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight, with minor horizontal curvature to the east. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present.
Vertical Visibility Northern Access	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road generally follows an east-west gradient, rising towards the west and falling towards the east, with a minor crest to the east. Further to a site visit, it was observed that no vertical constraints to the achievement of the proposed visibility splay are present.

Horizontal Visibility Southern Access	Horizontal visibility is achievable , subject to the moderate removal of vegetation and hedgerow on the southern highway boundary to the east and minor removal of vegetation and hedgerow on the southern highway boundary to the west. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight, with minor horizontal curvature to the east. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present.
Vertical Visibility Southern Access	Vertical visibility is achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road generally follows an east-west gradient, rising towards the west and falling towards the east, with a minor crest to the east. Further to a site visit, it was observed that no vertical constraints to the achievement of the proposed visibility splay are present.

2.33 Access RR-02 – Loverose Way, Rotherham



Figure 33: RR-02 Indicative Location

Table 33: RR-02 Review

Road Status	
Adopted / Unadopted	Unadopted (private road)
Speed Limit	Unknown
Applicant's Proposal	
Proposed Visibility Splay	90m to the north and south (DMRB Desirable Minimum SSD compliant for a 30mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	Existing access along the eastern highway boundary.
Daily Vehicle Access	Estimated 14 HGVs and 36 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation on the western highway boundary to the north and south, and minor removal of hedgerow on the eastern highway boundary. No Street View imagery is available; however aerial imagery indicates that, in the vicinity of the proposed access, the road appears generally straight, with no significant horizontal curvature. No horizontal constraints to the achievement of the proposed visibility splay have been identified from available imagery.
Vertical Visibility	It is unknown if vertical visibility is achievable. No Street View imagery is available. The proposed access is located on an unadopted road.

2.34 Access/Crossing CKL-01 – Killamarsh Lane, Rotherham



Figure 34: CKL-01 Indicative Location

Table 34: CKL-01 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	60mph
Applicant's Proposal	
Proposed Visibility Splay Northern Access	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Proposed Visibility Splay Southern Access	215m to the east and west (DMRB Desirable Minimum SSD compliant for a 60mph speed limit)
Access / Crossing	Crossing (PV Area)
Existing / New Access	New access along the northern and southern highway boundary.
Daily Vehicle Access	Unconfirmed
Stantec's Comments	
Horizontal Visibility Northern Access	Horizontal visibility is achievable , subject to the significant removal of vegetation and hedgerow on the southern highway boundary to the west and moderate removal of vegetation and hedgerow on the northern highway boundary to the east. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with significant horizontal curvature to the west. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splays are present. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splay.
Vertical Visibility Northern Access	Vertical visibility to the east is achievable . However, further to a site visit, it was observed that vertical visibility to the west is not achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road generally follows an east-west gradient, falling towards the east and rising towards the west, with a notable blind crest located to the west (as identified on the proposed access drawing).

Horizontal Visibility Southern Access	Horizontal visibility is achievable, subject to the significant removal of vegetation and hedgerow on the southern highway boundary to the west and moderate removal of vegetation and hedgerow on the northern highway boundary to the east. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with significant horizontal curvature to the west. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present. However, it is recommended that the visibility splay to the tangent is also demonstrated on the drawing to further confirm achievement of the proposed visibility splay.
Vertical Visibility Southern Access	Vertical visibility to the east is achievable. However, further to a site visit, it was observed that vertical visibility to the west is not achievable. Street View imagery indicates that, in the vicinity of the proposed access, the road generally follows an east-west gradient, falling towards the east and rising towards the west, with a notable blind crest located to the west (as identified on the proposed access drawing).

3 Derbyshire County Council Access Points

3.1 Access RR-01 – A618 Rotherham Road, Derbyshire



Figure 35: RR-01 Indicative Location

Table 35: RR-01 Review

Road Status	
Adopted / Unadopted	Adopted (forms part of the public adopted highway)
Speed Limit	50mph
Applicant's Proposal	
Proposed Visibility Splay	160m to the east and west (DMRB Desirable Minimum SSD compliant for a 50mph speed limit)
Access / Crossing	Access (PV Area)
Existing / New Access	New access along the northern highway boundary
Daily Vehicle Access	Estimated 13 HGVs and 39 staff vehicles.
Stantec's Comments	
Horizontal Visibility	Horizontal visibility is achievable , subject to the minor removal of vegetation and hedgerow on the northern highway boundary to the west and vegetation to the east. Street View imagery indicates that, in the vicinity of the proposed access, the road is generally straight with no significant horizontal curvature. Further to a site visit, it was observed that no horizontal constraints to the achievement of the proposed visibility splay are present.
Vertical Visibility	Vertical visibility to the west is achievable . However, further to a site visit, it was observed that vertical visibility to the east is not achievable . Street View imagery indicates that, in the vicinity of the proposed access, the road generally follows an east-west gradient, falling towards the west and rising towards the east, with a notable blind crest located to the east (as identified on the proposed access drawing).

4 Summary and Conclusion

4.1 Summary

Stantec UK Limited (Stantec) has been instructed by Rotherham Metropolitan Borough Council (RMBC) and City of Doncaster Council (CDC) to provide multidisciplinary consultation support in relation to the proposed Whitestone Solar Farm Development Consent Order (DCO) application (ref: EN0110020).

It should be noted that this Stantec note exclusively relates to highways and transportation matters within the RMBC authority boundary, specifically the highway access points associated with both the construction and the ongoing operation of the proposed Whitestone Solar Farm.

A total of 53 site access points is proposed for the Whitestone Solar DCO project, spanning mainly both Rotherham and Doncaster local authority boundaries, and one access within Derbyshire County Council local authority boundary. These access points encompass 29 Photo Voltic (PV) area access points and 24 Cable Corridor access points.

The 'Whitestone Solar Farm - Highway Access Review', dated 3 June 2026, included as **Appendix A**, provided comments on 16 proposed access points which were shared prior to the submission of the application. RMBC considered these 16 access points to be problematic as they either possess a reduced visibility splay based on speed survey data, or are subject to a temporary 30mph speed limit. To inform this note, a site visit was undertaken by Stantec on 15 May 2026. All comments provided within the note remain unchanged.

This note has provided commentary on the 35 remaining proposed access points within the Rotherham Metropolitan Borough Council and Derbyshire County Council local authority boundaries, including any issues that will need to be addressed before each respective proposed access can be considered suitable for either construction or operational traffic. To inform this note, a site visit was undertaken by Stantec on 17 August 2026.

Further to the commentary provided within this note, a Stage 1 Road Safety Audit (RSA) and Designer's Response will be required for each access point accessible from the publicly adopted highway. It is advised that the Applicant should agree the brief of the RSA and auditors prior to progressing RSAs.

Stantec has also prepared a Public Rights of Way Technical Note, also dated 24 August 2026, which should be read in conjunction with this note.

4.2 Conclusion

The proposed visibility splays at the following site access and crossing points are **achievable**, subject to the implementation of the hedgerow and vegetation removal shown on the proposed access drawings:

Rotherham Metropolitan Borough Council

Adopted Highway

- Access SL-01 – Slacks Lane
- Access SL-02 – Slacks Lane



- Access WL-02 – Wood Lane
- Access WL-02 – Wood Lane
- Crossing CBL-01 – Brampton Lane
- Crossing CCL-01 – Carr Lane
- Crossing CUL-01 – Ulley Lane
- Access PEHL-02 – Penny Hill Lane
- Access PEHL-03 – Penny Hill Lane
- Access HHL-02 – Hawk Hill Lane
- Access LR-05 – Long Road
- Access CL-03 – Common Lane
- Access EFL-01 – Field Lane
- Access CC-01 – Common Lane: Common Lane is within RMBC authority boundary, but the access extending north is in DCC authority boundary
- Access CC-02 – Common Lane
- Access CC-09 – Morthen Lane
- Access CC-10 – Morthen Lane
- Access CC-14 – A618 Pleasley Road
- Access SR-03 – A57 Sheffield Road
- Access CC-17A – A57 Sheffield Road
- Crossing CWL-01 – Walseker Lane
- Crossing CC-26/27 – Woodall Lane
- Access/Crossing CFL-01 – Field Lane
- Access HHL-03 – Hawk Hill Lane
- Access CC-07 – Morthen Road
- Access CC-08 – Morthen Road
- Access CC-06 – Sandy Lane
- Access CC-06C – Sandy Lane/Sherbourne Avenue

Unadopted Private Land

- Crossing SEL-01 – Second Lane
- Crossing CC-P1 – Private Road off A57 Sheffield Road
- Crossing CC-P2 – Private Road off Dog Kennels Hill: vertical visibility is unknown, however this access is on unadopted private land and therefore does not impact the adopted public highway
- Crossing CC-P3 – Private Road off Dog Kennels Hill: vertical visibility is unknown, however this access is on unadopted private land and therefore does not impact the adopted public highway
- Access RR-02 – Loverose Way: vertical visibility is unknown, however this access is on unadopted private land and therefore does not impact the adopted public highway

The proposed visibility splays at the following site accesses and crossing points are **unachievable**, notwithstanding the implementation of the hedgerow and vegetation removal shown on the proposed access drawings:

Rotherham Metropolitan Borough Council



Adopted Highway

- Access CL-01 – Common Lane: vertical visibility to the south is not achievable
- Access HHL-01 – Hawk Hill Lane: vertical visibility to the east is not achievable
- Access CC-11 – A618 Pleasley Road: vertical visibility to the south is not achievable
- Access CC-13 – A618 Pleasley Road: vertical visibility to the south is not achievable
- Access CC-25 – Hard Lane: vertical visibility to the north is not achievable
- Access HL-02 – Hard Lane: vertical visibility to the south is not achievable
- Access/Crossing CKL-01 – Killamarsh Lane: vertical visibility to the west is not achievable
- Access POHL-02 – Pocket Handkerchief Lane: speed survey is required to the south of the access to determine if lower vehicle speeds are recorded, justifying a reduced visibility splay
- Access LL-01 – Long Lane: visibility to the north is not achievable
- Access LL-02 – Long Lane: visibility to the west is not achievable
- Access GCL-02 – Guilthwaite Common Lane: visibility to the northeast is not achievable
- Access CC-03 – Bramley Lane: proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted
- Access CC-04 – Lidget Lane: proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted
- Access CC-05B – Lidget Lane: proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted
- Crossing CC-18 – Dog Kennels Hill: proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted
- Crossing CC-19/20 – Lady Field Road: proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted
- Crossing CC-21/22 – Packman Lane: proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted
- Crossing CC-23/24 – Manor Road: proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted

Derbyshire County Council

Adopted Highway

- RR-01 – A618 Rotherham Road: vertical visibility to the east is not achievable



APPENDICES



Appendix A Technical Note, dated 3 June 2026



Whitestone Solar Farm - Highway Access Review

Date:

03 June 2026

Prepared for:

Rotherham Metropolitan Borough Council

Prepared by:

Jack Fawdington



Document control sheet

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1.0 Introduction

Stantec has been instructed by Rotherham Metropolitan Borough Council (RMBC) to provide pre-examination multidisciplinary consultation support in relation to the proposed Whitestone Solar Farm Development Consent Order (DCO). It should be noted that this Stantec report exclusively relates to highways and transportation matters within the RMBC authority boundary, specifically the highway access points associated with both the construction and the ongoing operation of the proposed Whitestone Solar Farm.

A total of 54 site access points are proposed for the Whitestone Solar DCO project, spanning both Rotherham and Doncaster local authority boundaries. These access points encompass 29 Photo Voltic area access points and 25 Cable Corridor access points.

At this stage, the Applicant has provided drawings of 16 access points, which the Applicant consider are problematic. This report provides comments on these 16 access points. Of these access total points, 7 accesses have been proposed by the Applicant to provide a reduction in visibility splay (in relation to DMRB CD 109 standards) based on 2026 speed survey data, whilst 9 accesses are proposed to be subject to a temporary 30mph speed limit owing to local highway conditions.

In total, 16 access points are identified by the Applicant as either possessing a reduced visibility splay based on speed survey data, or being subject to a temporary 30mph speed limit. It should be noted that these 16 access points are exclusively situated within the RMBC local authority and as such the suitability of these proposed accesses are the focus of this Stantec report. For each access point, this report identifies the specific location and provides commentary on any issues that will need to be addressed before each respective access can be considered suitable for either construction or operational traffic.

To compliment and further inform the discussion provided within this report, a site visit was undertaken by Stantec on the 15th May 2026 to each access point under consideration.

2.0 Documents & Drawings Submitted

The following documentation was submitted by DWD Planning Consultants (acting on behalf of the Applilets cant) to Stantec via email on the 15th April 2026:

- Access Consultation Rotherham PowerPoint.
- Drawing CE-ACM-GEN-ZZ-DR-HW-000108-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000110-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000111-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000120-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000131-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000203-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000204-Paper.pdf



- Drawing CE-ACM-GEN-ZZ-DR-HW-000205-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000206-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000207-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000208-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000215-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000216-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000217-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000218-Paper.pdf
- Drawing CE-ACM-GEN-ZZ-DR-HW-000224-Paper.pdf

3.0 Key Discussion Points

Prior to the access specific analysis provided within this report, it should be noted that the following overriding matters will need to be considered and addressed by the Applicant before the detailed arrangement of each respective access can be agreed:

- 1) The volume and type of construction vehicles expected to utilise each respective access point for the full duration of the project construction will need to be clarified by the Applicant.
- 2) The expected duration of works at each respective access point will need to be confirmed by the Applicant.
- 3) Further information is required in relation to the frequency of traffic flows and the associated vehicle type expected to utilise each respective access once the project is operational.
- 4) Further information is required in relation to the frequency of movements and associated vehicle type for each respective 'crossing' point. Provision of this information is necessary to inform the level of traffic management that may be required at each crossing point.
- 5) Where any speed survey indicates that traffic speeds are equal to or greater than 40mph, it is maintained that DMRB standards must be utilised to dictate visibility splay requirements.
- 6) RMBC has confirmed that all visibility standards must align to the desirable minimum Stopping Sight Distance (SSD) standards as detailed within DMRB CD109. In addition, with reference to speed surveys, RMBC will accept a desirable minimum SSD factored in accordance with the results of the speed survey.
- 7) RMBC has separately confirmed that one step below desirable minimum SSD visibility standards, as detailed within DMRB CD109, will only be considered in instances where there is a specific, unavoidable physical constraint that cannot be mitigated, such as a bridge. It should be noted that land ownership is not considered a viable physical obstruction.



- 8) The design of all access points will need to ensure that forward visibility is not compromised for vehicles on the existing highway, ensuring vehicles have sufficient visibility to safely stop before encountering an unexpected obstruction, i.e. a right turning HGV.
- 9) The implementation of temporary 30mph limits on rural, National Speed Limit roads and how these speed limits will be specifically enforced presents a significant concern with regards to safety. RMBC has separately confirmed that the implementation of 30mph temporary speed limits will not be accepted.
- 10) Absent of any additional information with regards to the potential enforcement of 30mph temporary speed limits, it is maintained that access point visibility splays are designed in relation to the speed limit of the road or the corresponding speed surveys at each site.
- 11) A Stage 1 Road Safety Audit (RSA) and Designer's Response will be required for each access point. It is advised that the Applicant should agree the brief of the RSA and auditors prior to progressing RSAs.
- 12) A significant proportion of the access points under consideration are situated on narrow, rural roads which possess little margin for larger vehicles to pass each other. The Applicant will need to consider an appropriate mitigation / traffic management strategy to ensure that the construction of each respective access does not require construction vehicles to obstruct the operation of the carriageway.
- 13) Dependent on the frequency of construction vehicles crossing the highway at designated crossing points, temporary traffic lights / traffic management may be required to safely facilitate crossing vehicles. Further information should be provided by the Applicant in relation to where traffic management measures may be required, and what form these measures will take.



4.0 Access Points

4.1 Access LL-01 – Long Lane, Rotherham

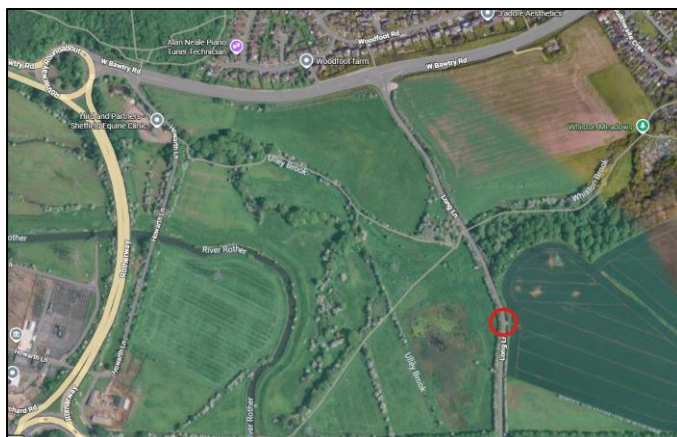


Figure 1: LL-01 Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	47 mph	133m desirable minimum. 103m absolute minimum.	Reduced vis splay proposed.	Access

- Existing agricultural access
- Visibility to north is restricted both in terms of vertical and horizontal visibility. Achievement of absolute minimum horizontal visibility to north does not appear possible principally as a result of vertical visibility. Hedgerow clearance would also be required to south to achieve minimum horizontal visibility, however this may be superseded by vertical issue.
- Irrespective of interventions, it is unclear if minimum visibility standards could be met in this location.
- RMBC has identified that a planning application has been submitted for a proposed electrical substation at this location. Should the substation be granted planning permission, the DCO access will be required to tie into any revised highway arrangement at this location.
- Daily vehicle access – estimated 11 HGVs and 28 staff vehicles.

4.2 Access LL-02 – Long Lane, Rotherham



Figure 2: LL-02 Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	47 mph	133m desirable minimum. 103m absolute minimum.	Reduced vis splay proposed.	Access

- Existing agricultural access.
- Desirable minimum horizontal visibility to northeast appears achievable with no intervention.
- Desirable minimum horizontal visibility to west is not achievable. Potential vertical visibility issues and requirement for significant hedgerow clearance on northernmost highway boundary.
- Irrespective of interventions, it is unclear if minimum visibility standards could be met in this location.
- Daily vehicle access – estimated 6 HGVs and 19 staff vehicles.

4.3 Access GCL-02 – Guilthwaite Common Lane, Whiston

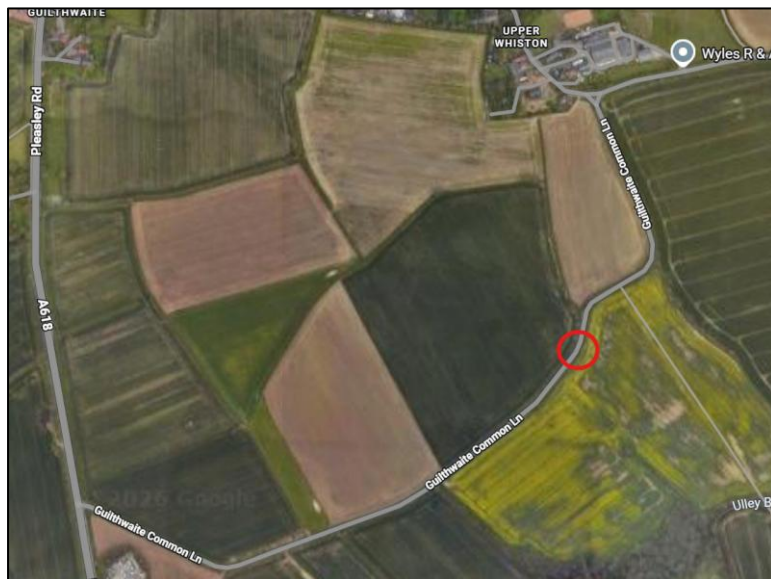


Figure 3: GCL-02 Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	43 mph	113m desirable minimum. 88m absolute minimum.	Reduced vis splay proposed.	Access

- New access required.
- Gradient from carriageway to adjacent field (south) presents a notable drop which may implicate resultant visibility.
- Achievement of minimum suitable forward visibility from northeast appears potentially unachievable owing to the position of the access in relation to the curvature of the carriageway.
- Desirable minimum horizontal visibility to northeast is not achievable. Significant vegetation clearance along southern highway boundary would be required.
- Desirable minimum horizontal visibility to southwest appears achievable with no intervention.
- Daily vehicle access – estimated 15 HGVs and 34 staff vehicles.

4.4 Access CFL-01 – Field Lane, Morthen



Figure 4: CFL-01 Site Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	47mph	133m desirable minimum. 103m absolute minimum.	Reduced vis splay proposed.	Crossing / Emergency Maintenance

- New access required on northern highway boundary to facilitate crossing point. Existing access situated to southern highway boundary.
- Desirable minimum horizontal visibility to both west and east is not achievable. Significant vegetation clearance along northern and southern highway boundary would be required.
- It is expected that the new access will materially interact with the existing Stow Bridge Lane Public Right of Way (PRoW). This will require suitable management to ensure safe access is maintained for Non-Motorised Users (NMUs).
- Daily vehicle access – unconfirmed.

4.5 Access HHL-03 – Hawk Hill Lane, Thurcroft



Figure 5: HHL-03 Site Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	44 mph	120m desirable minimum. 90m absolute minimum.	Reduced vis splay proposed.	Access

- Existing agricultural access.
- Desirable horizontal minimum visibility to east and west appears achievable with no intervention.
- Daily vehicle access – unconfirmed.

4.6 Access CC-03 – Bramley Lane, Rotherham



Figure 6: CC-03 Site Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	n/a – 30mph temporary limit proposed	90m temporary speed limit	30mph vis splay proposed.	Access

- Existing agricultural access.
- The proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted.
- Should visibility requirements ultimately be dictated by DMRB standards, it is expected that hedgerow removal would be required to achieve desirable minimum requirements.
- The implementation of temporary 30mph limits on rural, National Speed Limit roads and how these speed limits will be specifically enforced presents a significant concern with regards to safety. Absent of any additional information with regards to potential enforcement, it is maintained that access point visibility splays are designed in relation to corresponding speed surveys at each site.
- Daily vehicle access – unconfirmed.

4.7 Access CC-04 – Lidget Lane, Rotherham



Figure 7: CC-04 Site Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	n/a – 30mph temporary limit proposed	90m temporary speed limit	30mph vis splay proposed.	Access

- New access required.
- The proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted.
- Should visibility requirements ultimately be dictated by DMRB standards, it is expected that hedgerow removal would be required to achieve desirable minimum requirements.
- The implementation of temporary 30mph limits on rural, National Speed Limit roads and how these speed limits will be specifically enforced presents a significant concern with regards to safety. Absent of any additional information with regards to potential enforcement, it is maintained that access point visibility splays are designed in relation to corresponding speed surveys at each site.
- Irrespective of the issues noted above, there remains the possibility that CC-03 (Bramley Lane) and CC-04 (Lidget Lane) could potentially be connected via an internal link, thus negating the need for two dedicated access points. However, this would require the implementation of a safe vehicular crossing point over Hellaby Brook which intersects both proposed access points.
- Daily vehicle access – unconfirmed.

4.8 Access CC-05B – Lidget Lane, Rotherham



Figure 8: CC-05B Site Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	n/a – 30mph temporary limit proposed	90m temporary speed limit	30mph vis splay proposed.	Access

- Existing agricultural access.
- The proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted.
- Should visibility requirements ultimately be dictated by DMRB standards, it is expected that significant hedgerow removal would be required to the southwest to achieve desirable minimum horizontal requirements.
- The implementation of temporary 30mph limits on rural, National Speed Limit roads and how these speed limits will be specifically enforced presents a significant concern with regards to safety. Absent of any additional information with regards to potential enforcement, it is maintained that access point visibility splays are designed in relation to corresponding speed surveys at each site.
- While matters relating to speed surveys remain outstanding, the desirable minimum horizontal visibility to the northeast appears achievable with no intervention.
- Daily vehicle access – unconfirmed.

4.9 Access CC-06 – Sandy Lane, Rotherham



Figure 9: CC-06 Site Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	n/a – 30mph temporary limit proposed	90m temporary speed limit	30mph vis splay proposed.	Access

- Bus stop relocation will be required.
- Would require the closure of the PRow for the full duration of construction. Further information would be required as to how this PRow would be rerouted / access maintained.
- The proximity of the proposed works to the M18 mainline embankment to the east will require National Highways consultation in terms of establishing clarity in relation to both land ownership and embankment structure.
- Based on the vehicle tracking presented, the proximity of the proposed access to property boundaries may present a significant issue with regards to preventing conflicts between construction vehicles and ensuring third party property is not damaged by the access / egress of HGVs or abnormal loads.
- While the desirable minimum horizontal visibility to east and west appears achievable with no intervention, even based on the existing 40mph limit of the road, the aforementioned issues will require resolution before the principle of the access can be accepted.
- It is noted that access for abnormal load vehicles is required at this access, therefore further analysis will be required in consultation with National Highways in relation to whether use of the M18 overbridge would be viable for such vehicles in terms of weight limits.
- Daily vehicle access – estimated 12 HGVs and 16 staff vehicles.

4.9.1 Access CC-06C – Sandy Lane / Sherbourne Avenue, Rotherham



Figure 20: CC-06C Site Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
30mph – DMRB 90m desirable minimum SSD achievable (Sandy Lane to Broadlands)	n/a	n/a	n/a	Access

- Extensive residential on-street parking currently takes place on Sherbourne Avenue. An appropriate Traffic Regulation Order (TRO) would need to be implemented to manage on-street parking otherwise HGV access would not be possible.
- Owing to the typology and dimensions of Sherbourne Avenue in addition to the volume of family homes and their proximity to the highway, a number of safety concerns would be raised by any regular HGV access at this location, particularly as HGVs would be required to reverse the full extent of the street upon departure.
- Access at this location would likely require the clearance of the mature tree at the eastern extent of Sherbourne Avenue.
- Visibility splays are not considered to present a constraint at this location.
- Daily vehicle access – estimated 2 HGVs and 6 staff vehicles.

4.9.2 Access CC-07 – Morthen Road, Morthen



Figure 31: CC-07 Site Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	50 mph	146m desirable minimum. 111m absolute minimum.	Reduced vis splay proposed.	Access

- New access required.
- Desirable minimum horizontal visibility standards to both north and south appear achievable subject to minor hedgerow clearance.
- Daily vehicle access – estimated 14 HGVs and 20 staff vehicles (shared between CC-07 and CC-08).

4.9.3 Access CC-08 – Morthen Road, Morthen



Figure 42: CC-08 Site Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	50 mph	146m desirable minimum. 111m absolute minimum.	Reduced vis splay proposed.	Access

- New access required.
- Desirable minimum horizontal visibility standards to both north and south appear achievable subject to minor hedgerow clearance.
- Daily vehicle access – estimated 14 HGVs and 20 staff vehicles (shared between CC-07 and CC-08).

4.9.4 Access CC-18 – Dog Kennels Hill, South Anston



Figure 53: CC-18 Site Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
40 mph – DMRB 120m desirable minimum SSD	n/a – 30mph temporary limit proposed	90m temporary speed limit	30mph vis splay proposed.	Crossing

- New access required to facilitate crossroads.
- Visibility splays are not expected to present a constraint at this location, however, the proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted.
- Dependent on the frequency of construction vehicles crossing the highway, temporary traffic lights may be required to safely facilitate crossing vehicles at this location owing to the volume of traffic utilising Dog Kennels Hill.
- Notable drop from northern and southern highway boundary which may present difficulties with regards to access construction.
- Daily vehicle access – unconfirmed.

4.9.5 Access CC-19/20 – Lady Field Road, South Anston



Figure 64: CC-19/20 Site Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	n/a – 30mph temporary limit proposed	90m temporary speed limit	30mph vis splay proposed.	Crossing

- New access required to facilitate crossroads.
- The proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted.
- Should visibility requirements ultimately be dictated by DMRB standards, it is expected that hedgerow removal would be required to the north and south to achieve desirable minimum requirements.
- The implementation of temporary 30mph limits on rural, National Speed Limit roads and how these speed limits will be specifically enforced presents a significant concern with regards to safety. Absent of any additional information with regards to potential enforcement, it is maintained that access point visibility splays are designed in relation to corresponding speed surveys at each site.
- The carriageway width in proximity to the site access is particularly narrow, such that the construction of passing bays may be required if larger construction vehicles are required to construct the proposed crossing point.
- Daily vehicle access – unconfirmed.

4.9.6 Access CC-21/22 – Packman Lane, Harthill



Figure 75: CC-21/22 Site Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	n/a – 30mph temporary limit proposed	90m temporary speed limit	30mph vis splay proposed.	Crossing

- New access required to facilitate crossroads.
- The proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted.
- Should visibility requirements ultimately be dictated by DMRB standards, it is expected that hedgerow removal would be required to the north and south to achieve desirable minimum requirements.
- The implementation of temporary 30mph limits on rural, National Speed Limit roads and how these speed limits will be specifically enforced presents a significant concern with regards to safety. Absent of any additional information with regards to potential enforcement, it is maintained that access point visibility splays are designed in relation to corresponding speed surveys at each site.
- Appropriate vertical visibility to the north may be difficult to achieve owing to the topography of the carriageway. This may in turn present difficulties with regards to the forward visibility SSD of the access when travelling southbound along Packman Lane.
- Daily vehicle access – unconfirmed.

4.9.7 Access CC-23/24 – Manor Road, Harthill

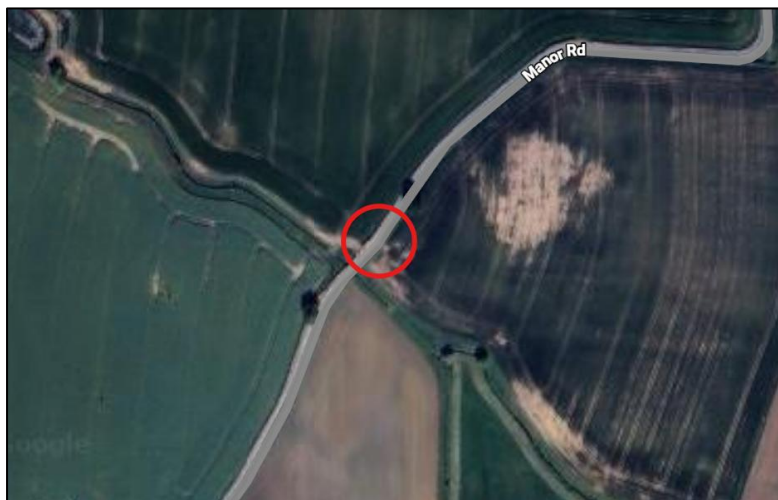


Figure 86: CC-23/24 Site Location

Road Spec	Speed Survey	Survey Vis Splay	Requirements	Access / Crossing
60mph – DMRB 215m desirable minimum SSD	n/a – 30mph temporary limit proposed	90m temporary speed limit	30mph vis splay proposed.	Crossing

- New access required to facilitate crossroads.
- The proposed 30mph speed limit will need to be justified via appropriate speed surveys, otherwise the resultant visibility assessment cannot be accepted.
- Should visibility requirements ultimately be dictated by DMRB standards, it is expected that hedgerow removal would be required to the north and south to achieve minimum requirements.
- The implementation of temporary 30mph limits on rural, National Speed Limit roads and their enforcement presents a significant concern with regards to safety. Absent of any additional information with regards to potential enforcement, it is maintained that access point visibility splays are designed in relation to corresponding speed surveys at each site.
- An existing public footpath is located in immediate vicinity to the proposed crossroads, however this does not appear to have been mapped on the access drawing. It is expected that the new access will materially interact with this PRow, therefore suitable management measures will be required to ensure safe access is maintained for NMUs.
- The carriageway width in proximity to the site access is particularly narrow, such that the construction of passing bays may be required if larger construction vehicles are required to construct the proposed crossing point.
- Daily vehicle access – unconfirmed.



Stantec is a global leader in sustainable engineering, architecture, and environmental consulting. The diverse perspectives of our partners and interested parties drive us to think beyond what's previously been done on critical issues like climate change, digital transformation, and future-proofing our cities and infrastructure. We innovate at the intersection of community, creativity, and client relationships to advance communities everywhere, so that together we can redefine what's possible.

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Appendix 2 PROW Technical Note





Job Name: Whitestone Solar Farm
Note No: TN05
Date: 24 August 2026
Prepared By: Georgina Whitehead: Graduate Transport Planner
Checked By: Brian Laird: Technical Director - Transport Planning
Client: Rotherham Metropolitan Borough Council & City of Doncaster Council
Subject: **Whitestone Solar Farm Development Consent Order**
Public Rights of Way Technical Note

1. Introduction

- 1.1. Stantec UK Limited (Stantec) has been instructed by Rotherham Metropolitan Borough Council (RMBC) and City of Doncaster Council (CDC) to provide multidisciplinary consultation support in relation to the proposed Whitestone Solar Farm Development Consent Order (DCO) application (ref: EN0110020).
- 1.2. The purpose of this technical note is to provide commentary on the proposed management of Public Rights of Way (PRoW) within and adjacent to the proposed Whitestone Solar Farm DCO.
- 1.3. It should be noted that this Stantec note exclusively relates to PRoW matters within the Rotherham Metropolitan Borough Council authority boundary.
- 1.4. A Technical Note has also been prepared by Stantec, dated 24 August 2026, to provide a review of the proposed construction and operational site accesses and should be read in conjunction with this Technical Note.

2. Summary of Proposed PRoW Management and Mitigation

- 2.1. The outline Public Right of Way Management Plan (PRoWMP), submitted with the DCO application, has identified a number of existing PRoWs which pass through or adjacent to the proposed Whitestone Solar Farm DCO. The overarching approach is to retain existing routes wherever practicable throughout construction, operation and decommissioning. The submitted documentation indicates that:
 - The majority of existing PRoWs would remain available throughout the lifetime of the development.
 - Temporary diversions are proposed at numerous locations where construction activities or cable installation works intersect existing routes. The temporary diversions are shown on the Streets, Rights of Way and Access Plans, which was also submitted with the DCO application.
 - One permanent diversion is proposed for Aston Footpath No.16 due to its interaction with the proposed solar array layout. The proposed permanent diversion route is expected to be 276m in length, representing an additional 110m in length compared to the existing route for users travelling east and heading south. Whereas users heading east and north would only experience an additional 7m increase in route compared to the existing route.
 - One temporary closure with no diversion is proposed for up to a one month period at a section of Whiston Footpath No.12 which passes beneath the M1. During construction of the Cable Corridor, there is no suitable diversion option that would maintain a safe separation distance between construction activities and PRoW users.

- A network of new permissive paths is proposed throughout the site during the operational phase of the development. Proposed permissive paths included within the Order Limits will be installed and active for public use throughout the operational phase of the scheme only, after which permitted public use will cease. The proposed permissive path network is also shown on the Streets, Rights of Way and Access Plans.
- 2.2. The PRowMP proposes a range of measures intended to minimise impacts on users during construction and operation, including:
- Retention of access wherever practicable.
 - Temporary diversions where routes conflict with construction works.
 - Advance notification and signage.
 - Traffic management measures where construction routes cross PRowS.
 - Use of marshals or banksmen at crossing points, with priority given to PRow users.
 - A proposed minimum 15m offset between PRowS and perimeter fencing, on either side of PRowS.
- 2.3. The outline Construction Traffic Management Plan (CTMP), also submitted with the DCO application, supports the PRowMP and includes an objective to minimise restrictions on PRowS during construction. The document confirms that PRow crossing locations and diversion points will be monitored throughout the construction period and that temporary traffic management measures will be implemented where required.

3. Stantec Comments

Permanent Diversion of Aston Footpath No.16

- 3.1. A permanent diversion is proposed for Aston Footpath No.16. The diversion is expected to increase route length by an additional 110m for users travelling east and heading south, and an additional 7m for users heading east and north. It is considered that the diversion does not represent a significant increase in length and that the diversion provides a direct, appropriate and attractive alternative to the existing alignment.

Temporary Closure of Whiston Footpath No.12

- 3.2. A temporary closure is proposed for Whiston Footpath No.12, potentially for up to one month, due to construction activities associated with the cable corridor near the M1 underpass. The PRowMP identifies that there is no safe alternative in the immediate proximity to temporarily divert the alignment of PRow. It is considered that the proposed temporary closure for up to one month does not represent a significant period of time. Furthermore, an alternative route across the M1 via the footways on the A618 Pleasley Road is available.

Definitive Map Modification Orders

- 3.3. The PRowMP acknowledges that a number of Definitive Map Modification Orders (DMMO) applications exist within the vicinity of the site; however, these are not identified or mapped. The PRowMP states that any future routes established through the DMMO process would be managed in a similar manner to existing routes. Further information regarding which DMMO applications have been considered, whether any are likely to affect the Order Limits and whether any could influence the proposed PRow mitigation strategy should be provided.

Promoted Routes

- 3.4. Several RMBC promoted routes pass through or adjacent to the proposed Whitestone Solar Farm DCO. Further information should be provided regarding the proposed management of these promoted routes.

4. Conclusion

- 4.1. The overall approach to PRow management is considered reasonable and generally consistent with the objective of maintaining public access during construction and operation. The submitted documents demonstrate that affected routes have been identified and a framework for managing interactions between PRow users and construction activities has been developed.
- 4.2. Subject to clarification regarding outstanding DMMO applications and the management of promoted routes, no significant concerns are identified in relation to the proposed PRow management strategy.