



Harthill with Woodall Parish Council



Village Hall
Winney Hill
Harthill
Sheffield
S26 7YL

22nd October 2025

To:
Whitestone Solar Farm
Freepost SEC NEWGATE UK LOCAL

Subject: Formal Objection – Proposed Whitestone Solar Farm (EN0110020)
Statutory Consultation (16 September – 28 October 2025)
Section 42 of the Planning Act 2008 – Pre-Application Consultation

Dear Sir or Madam,

Harthill with Woodall Parish Council writes in response to the statutory consultation for the proposed Whitestone Solar Farm (EN0110020). Our Parish lies within the immediate impact area of Whitestone 3, and we represent the residents and communities most directly affected by this proposal.

Council met and discussed the pre-application consultation and associated documents at our recent meeting on 14th October 2025 and unanimously agreed to OBJECT to this proposal in its current form.

On 22nd October 2025, Harthill with Woodall Parish Council also hosted a public meeting in the Village Hall, which was attended by a large number of parishioners. The strength of turnout and the volume of concerns raised clearly demonstrate the depth of local opposition and anxiety regarding this development.

While we understand and support the need for renewable energy, we believe that this particular project is the wrong development in the wrong place. The proposal is vast in scale, industrial in character, and would bring irreversible harm to our countryside, our Green Belt, and the wellbeing of our residents.

Whitestone Solar Farm is classed as a Nationally Significant Infrastructure Project (NSIP) — and while that reflects its national importance, it also creates enormous challenges for small local councils. The volume and complexity of documents provided make it almost impossible for parish councils, who work with limited time and resources, to properly assess the impacts within the short consultation period.

We therefore submit this formal objection at the pre-application stage. Should the developer proceed to a Development Consent Order next year, we will make further detailed representations to the Planning Inspectorate.

Scale and Location

The Whitestone Solar Farm represents an ill-conceived, industrial-scale intrusion into the heart of South Yorkshire's rural landscape. It undermines food security, disregards community voices, and exposes the region to lasting environmental and safety risks — all while offering limited and poorly evidenced public benefit.

The development is excessively large and fragmented, spanning multiple parishes and boroughs that have little or no geographical or community connection. The decision to combine Whitestone 1, 2, and 3 into a single Development Consent Order (DCO) may streamline the process for the developer, but it makes it far more difficult for local authorities and affected parishes to ensure that their specific concerns are properly represented. Treating three separate landscapes as a single administrative project risks diluting local knowledge and obscuring the distinct impacts that each area will face.

The Council also notes that combining three distinct sites under a single Development Consent Order appears to provide clear financial and procedural advantages to the developer, reducing costs associated with consultation, environmental assessment, and shared infrastructure such as grid connections and cabling. However, this approach sacrifices local transparency and undermines the ability of individual communities to properly scrutinise the impacts relevant to their own areas.

The majority of land identified within our Parish (W3) is among the best and most productive farmland in South Yorkshire. These fields have supported crops, hay, and silage production for generations. Converting them into an industrial site for 60 years would permanently remove them from food production at a time when national food security and self-sufficiency are critical.

Given the scale and impact of this proposal, it is reasonable to expect that the developer would have carried out a transparent and detailed assessment of alternative sites — particularly brownfield or lower-grade agricultural land. However, the evidence presented so far suggests that this has not been done adequately, and that the current locations have been chosen primarily for convenience of grid connection rather than for genuine environmental or planning suitability.

Alternative Sites

Given the scale and sensitivity of the Whitestone Solar Farm proposal, the developer should have demonstrated a rigorous and transparent process for identifying and comparing alternative sites. However, the "Alternatives and Design Evolution" section of the Draft Environmental Statement (Volume 1, Chapter 4) provides only limited information and does not contain the level of assessment expected for a Nationally Significant Infrastructure Project.

The report refers to "broad search areas" identified primarily by proximity to grid connection points, but offers no meaningful analysis of environmental constraints, landscape character, or

community setting. It presents no clear evidence that brownfield land, degraded land, or lower-grade agricultural land was actively considered or ruled out. Instead, the process appears to have been driven almost entirely by technical convenience and grid accessibility rather than by environmental or social suitability.

The Draft Environmental Statement also refers to an internal “site selection process” used to identify potential areas for development, but no evidence or outputs of that process have been provided as far as we can see. If a formal site assessment or constraints mapping exercise exists, it has not been published for public review. Without access to that information, it is impossible for consultees to understand or verify how and why the selected locations were chosen over others.

It is further noted that the assessment does not consider the potential for distributed or rooftop solar generation within the same region — options that could deliver renewable energy without the same degree of landscape and community harm. At no point is there evidence of engagement with local authorities, environmental organisations, or land-use experts to ensure that more appropriate and less harmful locations were explored.

The lack of detailed comparison between potential sites means that the chosen locations cannot be said to represent the least environmentally damaging or most sustainable option. In this respect, the proposal fails to meet the intent of the National Policy Statements for Energy (EN-1 and EN-3), which require developers to demonstrate that reasonable alternatives have been properly considered and that adverse impacts have been minimised as far as practicable.

Harthill with Woodall Parish Council therefore concludes that the “Alternatives and Design Evolution” assessment is inadequate, opaque, and fails to justify why this particular location — comprising good quality farmland and some of the most attractive and unspoilt countryside in South Yorkshire — was selected. The chosen location sits within open Green Belt farmland that is valued by residents and visitors alike for its beauty, tranquillity, and long views across the landscape.

It also appears that site selection was influenced more by landowner willingness and ease of grid connection than by environmental or planning merit. Portions of the land within the W3 area are owned by individuals or companies based outside the Parish, suggesting that decisions were shaped by where consent was easiest to obtain rather than by an objective evaluation of the least sensitive or most suitable land.

This lack of transparency over both environmental and ownership criteria further undermines public confidence in the scheme and strengthens the view that the project is cost-driven rather than community-driven.

Impact on the Green Belt and Countryside

The proposed development lies entirely within the Green Belt. Solar panels up to 3.8 metres high, together with fencing and CCTV masts, would fundamentally destroy the openness and rural character that Green Belt policy is designed to protect. Any claim that the land will remain “agricultural” through occasional sheep grazing is misleading and amounts to greenwashing.

The Green Belt between Harthill, Woodall, Kiveton, and Wales provides a vital visual and physical buffer between our communities. Once this land is built upon, that sense of separation and rural tranquillity will be lost forever.

The developer's own Draft Environmental Statement admits some "moderate to significant adverse impacts" on landscape character and visual amenity. Yet even that assessment is based on incomplete and misleading visualisations. Several important local viewpoints — including Harthill Wildflower Meadow (on the east side of Winney Hill), at Harthill Reservoir, on Hard Lane, and public footpaths around Harthill and Woodall — have been omitted, incorrectly described or angled incorrectly. The area labelled as "Viewpoint 48 – Kiveton Community Woodland" is in fact towards the Sheep Wash, and "Viewpoint 49 – Harthill Reservoir" includes no visuals showing the western footpaths, where the ability to screen the site is severely limited. The report's reliance on desktop analysis, without sufficient local site verification, is unacceptable.

While the Draft Environmental Statement broadly describes the W3 area as open and elevated farmland, it fails to explain that Harthill lies to the south-west and Woodall directly to the south of the valley. Both settlements sit on higher ground overlooking the W3 site — a crucial factor in understanding the visibility and dominance of the development within the landscape. Because of this topography, residents in both villages would look down onto the array, making meaningful visual or acoustic mitigation impossible.

The developer's mapping (Figures 7.4.3 and 7.4.6 of the Draft ES) lists several Landscape Character Areas throughout Whitestone Solar Farm site — including the Ryton Farmlands, Rother Valley Floor, Central Rotherham Coalfield Farmland, and East Rotherham Limestone Plateau — yet notably omits Harthill and Woodall. These villages have distinct topography and strong rural identity, recognised across South Yorkshire for their landscape quality and community pride. Their exclusion underlines the desk-based nature of the study and a lack of local understanding.

Pages 63–64 of the Draft ES (Vol 1, Ch 7) contain factual inaccuracies in assessing the visual effects for Whitestone 3. The table claims, for example, that views from Kiveton Community Woodland would be "Not Significant due to screening by the woodland," and that views from Harthill Reservoir and its surrounding public rights of way would result in only "Minor Adverse (Not Significant)" effects. These assertions are plainly incorrect. Both the Reservoir and the Community Woodland sit on higher ground overlooking the W3 site to the north and north-east, with wide, open views across the valley. The conclusion that these effects are "Not Significant" is unjustified and should be revisited through proper field-based verification rather than reliance on desk-based analysis.

These inaccuracies are demonstrated in the photographs provided at Appendix 1, which show multiple publicly accessible vantage points where the proposed solar panels would be fully visible — including views from the dam wall and western footpaths of Harthill Reservoir, both edges of Kiveton Community Woodland, the Wildflower Meadow, Hard Lane, and Broad Bridge Dyke. From these locations, the site lies in full, elevated view, with little or no natural screening. Claims of "screening by woodland" or "limited visibility" are wholly inconsistent with on-the-ground reality.

Most of these locations sit higher than the proposed panel arrays, meaning no hedgerow planting or acoustic fencing could realistically mitigate the visual impact. Even the applicant's

own Landscape and Visual Impact Assessment acknowledges that mitigation planting would take 10–15 years to mature, leaving the development starkly exposed across the countryside for much of its operational life. These landscape and visual effects are therefore permanent, significant, and unmitigable — directly conflicting with Green Belt policy aims to preserve openness and prevent urban encroachment.

In short, this scheme would cause a permanent loss of openness and a visible scar at the heart of South Yorkshire’s rural landscape.

Community, Character and Recognition

Harthill with Woodall is not just another rural settlement — it is a thriving, self-sufficient, and award-winning community. In 2025, our parish was named Overall Winner of the Yorkshire in Bloom “Golden Rose Award” for *Best Parish in Yorkshire*. The judges described it as “*a little gem... a community that is well-loved and well cared for.*” This recognition reflects decades of volunteer effort, environmental stewardship, and civic pride.

The Whitestone 3 proposal would industrialise the very landscape that underpins that achievement — replacing open countryside, floral gateways, and rural views with fencing, solar panels, and security infrastructure. To destroy what has just been recognised as one of Yorkshire’s best and most beautiful villages would be a grave and irreversible mistake.

This recognition demonstrates that the landscape and setting of Harthill and Woodall are integral to the community’s identity, wellbeing, and sense of place. The harm caused by industrialising that landscape cannot be mitigated or replaced through planting schemes or “biodiversity gain.” It represents a permanent loss of rural character, contrary to National Policy Statement EN-1 (paragraphs 4.2.3–4.2.6) and Rotherham Local Plan Policies CS20 and SP33, which require development to conserve and enhance local landscape character and heritage.

Loss of productive agricultural land.

The total development site spans approximately 3,400 acres of good quality farmland with increased estimates up to 4700 acres when cable corridors are included. Locally, in Harthill and Woodall, the land now proposed for Solar Panels has for decades been actively used for growing food crops, hay, and silage. Based on conservative estimates, the development site could yield up to 75,000 tonnes of potatoes per year—equivalent to 150 million portions of chips. Such figures illustrate the enormous value this land holds in supporting domestic food production.

This land will be lost to food production for 60 years. Pictures of sheep grazing under panels are misleading as sites are now removing sheep due to the damage they can cause—this is merely greenwashing.

In the current climate of global uncertainty, climate change, and increasing reliance on imported produce, the importance of national food security cannot be overstated. Government and environmental policy alike encourage us to buy local and reduce emissions associated with long-distance food transport. Removing this scale of productive farmland directly contradicts these aims and undermines long-term food sustainability for residents in Rotherham and beyond.

It is unacceptable to sacrifice such vast tracts of fertile, arable land for infrastructure when alternative sites—such as brownfield, industrial, and rooftop locations—remain underutilised across the UK. NSIPs should not come at the cost of local food systems.

Biodiversity and Habitat

Despite claims of “biodiversity gain,” the reality is that the project would transform open, historic countryside into an industrial landscape of glass, metal, and fencing. Residents and visitors would lose uninterrupted views, heritage character, and the natural habitats that currently support deer, birds of prey, badgers, foxes, and numerous farmland species. The scheme represents a wholesale change in land use, fragmenting ecosystems that have evolved around centuries of traditional farming.

The countryside around Harthill and Woodall supports a rich variety of wildlife — including bats, badgers, deer, raptors, and water voles. The *Draft Environmental Statement* itself (Chapter 9) acknowledges that ecological surveys remain incomplete, with further bat, bird, and habitat assessments “to be finalised post-consultation.” Consulting on a biodiversity strategy before the evidence base is finished undermines the credibility of any conclusions drawn at this stage.

At paragraph 5.2.21, the *Draft ES* refers to statutory designations such as SSSIs (Sites of Special Scientific Interest) but fails to recognise the importance of unprotected yet ecologically valuable areas nearby. The fields, hedgerows, and dykes that make up the W3 landscape provide continuous wildlife corridors connecting Broadbridge Dyke, the Chesterfield Canal, and local woodlands. These habitats are not designated but are nonetheless crucial to local biodiversity.

Local observations identify skylarks nesting and feeding within the affected cornfields — a red-listed species under the UK Birds of Conservation Concern 5 — and Southern Marsh Orchids growing off Walseker Lane, protected under the *Wildlife and Countryside Act 1981*. These species would be directly harmed by site clearance, piling, and long-term disturbance. No evidence has been provided that the RSPB or other recognised conservation bodies have been consulted to confirm appropriate mitigation.

Claims of “biodiversity gain” are unsubstantiated. As far as we have been able to ascertain in the time available, the developer has not published any Defra metric calculations, baseline ecological scores, or measurable biodiversity targets. Instead, the ES offers vague assurances that “enhancement opportunities will be explored.” Hedgerow planting and small habitat plots cannot replace the complex ecological value of long-established farmland ecosystems, and new planting will take decades to mature.

Further, fencing, CCTV masts, and lighting will fragment habitats and alter wildlife movement. Species such as badgers, deer, and hedgehogs will find their access routes blocked, while increased artificial light will disturb nocturnal species such as bats and owls. Drainage alterations and construction near Broadbridge Dyke will increase runoff and sedimentation, threatening water quality and aquatic life in both the Dyke and the Chesterfield Canal downstream.

Taken together, the Whitestone 3 development risks irreversible loss of habitat connectivity and a net decline in biodiversity, directly contradicting national environmental policy and the

biodiversity objectives of *NPS EN-1 (5.3.7–5.3.11)* and *Rotherham Local Plan Policy CS20 (Biodiversity and Geodiversity)*.

To ensure that important local species and habitats are properly safeguarded, Harthill with Woodall Parish Council object to the proposed Whitestone development. Any application should have evidence of a full set of completed peer reviewed ecological surveys and should have shown full consultation with local and national wildlife and conservation organisations and charities and local naturalists to ensure irreplaceable habitats are not lost.

Glint, Glare and Aviation Safety

Glint and glare are serious concerns for residents whose homes overlook the proposed development — particularly those along North Farm Close, Hard Lane, and the upper parts of Woodall. Bedrooms, living areas and gardens with clear views across the valley are likely to experience reflected sunlight from the panels, especially during sunrise and sunset.

The developer's own environmental report confirms that several residential locations around Whitestone 3 would experience medium to high levels of glare before any mitigation is applied. The proposed solution — relying on new hedgerow planting — is speculative and long-term. Even under ideal conditions, it would take 10 to 15 years before the planting provides meaningful screening, and it would do little to protect upper-storey windows or properties on higher ground.

The same report predicts glare impacts on local roads, including the A618, Hard Lane, Winney Lane, and the M1 motorway. Drivers using these routes could experience flashes of “yellow glare,” which the developer acknowledges may cause temporary after-image. Dismissing these as “short stretches of road” fails to reflect the real-world risk of driver distraction or momentary dazzle — Hard Lane is a fast road with a 60mph speed limit.

Of particular concern is the potential impact on Netherthorpe Airfield, located less than five kilometres from the W3 site. The developer's own modelling predicts more than 15 hours of yellow glare and 26 hours of green glare each year affecting Runway 24, directly within the airfield's approach path. National aviation guidance makes clear that no glare or after-image potential should occur along flight paths, meaning this issue raises legitimate safety concerns that must be independently reviewed.

Taken together, these results show that glint and glare impacts have not been properly verified or mitigated. The assessment relies entirely on computer modelling and future landscape planting that may take a decade to be effective. Until on-site visibility checks are carried out — from affected homes, public roads, and flight paths — the Parish Council considers these impacts to remain significant and unresolved.

Equestrian Safety and Recreation

The British Horse Society has cautioned that solar farms located near bridleways can pose serious safety risks. Horses are flight animals, and sudden reflections, fencing changes, or unfamiliar mechanical noises can easily startle them, leading to potentially dangerous incidents for riders and other road users. Bridleways must therefore remain safe, open, and free from industrial disturbance.

Horse riding is not merely a leisure activity — it is a vital source of exercise, recreation, and mental wellbeing for local residents. Over 90% of riders hack out for fitness and stress relief, yet these routes would no longer offer safe or peaceful conditions under the proposed scheme. The development would also result in the loss of up to seven local livery yards, displacing a long-established equestrian community and damaging rural livelihoods.

This is not simply a recreational matter, but a profound cultural and economic loss, undermining both community wellbeing and the rural way of life that defines Harthill and Woodall.

Degradation of Public Rights of Way

Our network of public footpaths and bridleways is one of the defining features of life in Harthill and Woodall. These routes — many of them centuries old — connect residents with open countryside, neighbouring villages, and cherished local landmarks such as Harthill Reservoir and Kiveton Community Woodland. They are used daily by walkers, dog owners, families, cyclists, and equestrians for recreation, health, and wellbeing.

The proposed Whitestone 3 development would transform these green, open paths into fenced industrial corridors bordered by rows of solar panels up to 3.8 metres high — the height of a double-decker bus. The developer's own Landscape and Visual Impact Assessment (Volume 1, Chapter 7, p. 64) records "Moderate to Major Adverse (Significant)" effects on several of these routes. This represents a clear and unacceptable loss of amenity for local residents and visitors alike.

Whitestone's glint and glare modelling also predicts reflections along numerous separate public paths within the development, yet dismisses them as "low impact." That conclusion is based only on computer analysis and takes no account of the area's terrain, open sightlines, or the fact that walkers and riders often stop at key viewpoints. In reality, reflected glare, fencing, and 24-hour security infrastructure will make these once-peaceful paths oppressive and unsafe — particularly during the construction phase where construction vehicles are also proposed to share or cross the routes.

For a parish that values its countryside access so highly, this would represent a permanent degradation of our rural way of life. The Parish Council therefore objects in the strongest terms to any development that would enclose, divert, or diminish public rights of way within Whitestone 3.

In addition, the Parish Council notes that Rotherham Metropolitan Borough Council's Rights of Way Officer recently commented on a separate planning application for a Battery Energy Storage System (RB2025/0240) on Hard Lane — adjacent to the Whitestone 3 site. That response identified a number of existing and well-used paths that also cross or border the Whitestone proposal area. The Officer stated:

"Although not recorded as a public right of way I am aware of uninterrupted use by the public for well in excess of 20 years. This route should be treated as a public right of way. None of these routes should be blocked, and [they should remain] available across their whole width at all times."

Whitestone must therefore give proper regard not only to designated Public Rights of Way, but also to long-established permissive or de facto routes that form part of the community's walking network. These paths are used daily by residents and visitors, and their interruption or diversion would cause unacceptable harm to access, recreation, and rural amenity. The Council expects the developer to recognise and respect these well-used routes in full, consistent with the position already set out by Rotherham's Rights of Way team.

Noise and Disturbance

Residents living near the proposed site currently enjoy a peaceful rural soundscape, broken only by natural and agricultural activity. The introduction of thousands of solar modules and associated electrical units will fundamentally alter that character.

The *Draft Environmental Statement* (Chapter 14, paragraph 2.4.12) identifies multiple Power Conversion System (PCS) units and inverters distributed across the site, each producing a constant low-frequency hum. These systems operate continuously whenever the site is generating power. Although the ES recognises that the surrounding area has “*very low background noise levels*”, it fails to explain how this industrial noise will alter that baseline or how it will be perceived cumulatively across such a large and elevated landscape.

The developer claims that panels will be set 50 metres from Public Rights of Way (PRoWs) and 100 metres from the nearest dwellings. However, consultation maps and on-site presentations indicated distances of only 15 metres either side of footpaths — a clear inconsistency. Where closer spacing is required, the ES proposes acoustic screening as mitigation. In practice, this would mean artificial barriers or dense planting across open agricultural fields — an unrealistic and visually intrusive measure, particularly on the exposed slopes around Hard Lane and the northern edge of W3. Given the topography, neither noise nor reflection could realistically be contained; both would carry unhindered across the valley.

Baseline sound surveys were limited in duration and fail to capture the quiet evening and night-time conditions that typify this area. The assessment also appears to treat individual PCS units separately, without considering the combined impact of dozens operating simultaneously. This significantly underestimates the true acoustic effect.

Noise impacts will be further amplified by weather. During heavy rainfall, thousands of tilted metal panels will create a widespread drumming effect as water strikes their surfaces — a factor wholly omitted from the developer's analysis.

The Parish Council therefore concludes that the noise assessment for Whitestone 3 is incomplete and unreliable. It fails to reflect the site's rural character, underestimates cumulative impacts, and proposes mitigation measures that are both ineffective and inappropriate for the setting

Construction, Traffic and Transport Impacts

The proposed two-year construction period would bring extensive disruption to local life. The suggested working hours – 7 a.m. to 7 p.m. on weekdays and Saturday mornings – mean continuous noise, dust, and heavy vehicle movement through small rural settlements for an

extended period. The cumulative effect of prolonged construction activity will significantly affect residential amenity, local air quality, and the peaceful character of our villages.

The *Draft Environmental Statement* (Chapter 13) provides no clear or consistent information about construction routes, access points, or cable corridors for Whitestone 3. Key maps remain marked “to be confirmed,” leaving residents unable to assess likely impacts. At consultation events, representatives gave conflicting answers about where construction traffic would enter the site and admitted that haul routes were still under review.

Local roads — including Hard Lane, Winney Hill, Killamarsh Lane, Todwick Road, and Kiveton Lane — are narrow, winding, and already under pressure from commuter and agricultural vehicles. They pass directly in front of primary schools and residential areas, raising serious safety concerns for children, pedestrians, and other road users. The proposed access from Hard Lane would use a well-used public footpath regularly walked by schoolchildren on their route to Wales Comprehensive School. Closing or diverting this footpath during construction would pose an unacceptable safety risk and remove a valued community route.

Residents have also raised concern about increased mud, dust, and vehicle emissions during construction, which would reduce air quality and cause surface drainage problems on already constrained rural roads. The draft traffic assessment appears to underestimate the true level of disruption, as it assumes each vehicle makes only a single daily journey and fails to account for subcontractors, suppliers, or visitor movements.

The ES also proposes construction activity near Broadbridge Dyke, a sensitive watercourse that supports protected species and drains into the Chesterfield Canal. Construction traffic, soil compaction, and temporary crossings in this area risk contaminating or damaging local wildlife habitats.

It is particularly alarming that the developer’s assessment of road safety relies heavily on desktop analysis, rather than site-specific traffic flow surveys or on-the-ground verification. No independent traffic count data or swept-path analysis for HGVs has been provided as far as we can see, and there is no credible plan for temporary traffic management or coordination with other major works already affecting the A618 and M1 corridors.

Local knowledge confirms that local roads are unsuited to articulated or abnormal-load vehicles. Gradients, tight bends, and poor visibility at junctions make it physically unsafe for large-scale construction traffic to pass through Harthill, Todwick, and Kiveton without causing damage to verges, infrastructure, and property.

The absence of a clear and credible Transport Management Plan at this stage is unacceptable. It leaves fundamental questions unanswered, including:

- How many daily vehicle movements are expected;
- Which roads will be used by HGVs and abnormal loads;
- How materials and waste will be stored or removed;
- And what mitigation will be applied to protect residents from noise, dust, vibration, and loss of amenity.

Until full and independently verified transport details are provided, the Parish Council cannot have confidence that the proposed construction traffic can be safely accommodated within the local road network.

The Parish Council therefore concludes that Whitestone has not met the standards required under the *Planning Act 2008* or *National Policy Statement for Energy (EN-1)* for assessing traffic and transport impacts. The omission of detailed access plans for Whitestone 3, particularly in the area around Harthill, Todwick, and Kiveton, renders this section of the Environmental Statement incomplete and unreliable.

Historic Landscape Destruction

Harthill is one of the oldest recorded settlements in South Yorkshire, appearing in the Domesday Book of 1086. Archaeological discoveries around the village and Harthill Reservoir indicate human activity dating back to the Bronze Age (around 3000 BC). The surrounding farmland, trackways, and hedgerow patterns still reflect centuries of agricultural use, preserving a landscape that has evolved continuously since early settlement.

The developer's own *Draft Environmental Statement* identifies "areas of heightened archaeological sensitivity" within the Whitestone 3 (W3) site and acknowledges the presence of features listed in the South Yorkshire Historic Environment Record (HER). These areas are described as being "sensitive to construction impacts", with the potential for remains of regional importance. However, the assessment categorises all features as being of only *low local value* pending further investigation, which effectively downplays their potential significance.

In plain terms, the developer accepts that archaeological remains within the W3 area will be truncated or destroyed during construction, with mitigation limited to "preservation by record" — meaning that evidence will be excavated and removed, not protected in situ. Once disturbed, these features and their context within the historic landscape cannot be reinstated.

The landscape around Harthill, Woodall, and the Chesterfield Canal forms part of a historic agricultural system that links Bronze Age and medieval field patterns to the modern-day village. Industrialising this area with fencing and cabling would permanently sever that continuity and destroy part of the parish's historic fabric.

Local historians and archaeological volunteers have recorded prehistoric and early medieval finds in and around Harthill and the Reservoir area. Given this known sensitivity, it is essential that specialist archaeological investigation be undertaken in consultation with the local archaeological society before any works commence. Without this collaboration, there is a serious risk that artefacts or features of national significance could be lost without proper study or preservation.

This harm would be permanent and irreversible, contrary to NPS EN-1 (5.8.11–5.8.14) and Rotherham Local Plan Policies CS23 and SP42, which require that both designated and non-designated heritage assets — and their wider landscape settings — are conserved.

Cumulative Impact

The Whitestone Solar Farm must be assessed in the context of the wider pattern of large-scale energy and housing developments already surrounding our Parish. Within a few miles of Harthill and Woodall, several major schemes are either approved or progressing through planning — including Exagen's Thurcroft Interchange Solar Farm, OnPath Energy's Battery Energy Storage

System (BESS), and Harmony Energy's BESS, located in the field immediately behind the Hard Lane substation and directly adjoining the proposed Whitestone 3 site. Added to this are the Clowne Garden Village development and the Common Farm Solar Farm, both of which will place further pressure on local roads, services, and the landscape.

For residents of Harthill, Woodall, and the wider Rother Valley area, these projects do not exist in isolation — they represent a steady and cumulative industrialisation of the countryside. When viewed together, their combined footprint and operational impacts far exceed what any one community should be expected to absorb. It is therefore essential that Whitestone's effects are considered in combination with these other developments, not as a standalone proposal.

Furthermore, there is growing concern that Rotherham is carrying a disproportionate share of Green Belt loss compared with neighbouring districts. This imbalance should be explicitly recognised and addressed in the assessment of cumulative landscape and environmental impacts.

Community Safety and Security

The Draft Environmental Statement confirms that each solar array area will be enclosed by security fencing approximately 2–2.5 metres high, with locked access gates and CCTV monitoring (Volume 1, Chapter 3). However, there is no dedicated assessment of safety, policing, or emergency response. The documents treat “security” purely as a matter of asset protection, not community safety or accessibility.

Continuous fencing and surveillance infrastructure will divide currently open farmland into a network of gated industrial compounds, fundamentally altering the appearance and character of the Green Belt. Despite these major physical interventions, the Environmental Statement contains no discussion of how emergency services would gain access, how the site will be monitored outside working hours, or what provisions exist to deter theft, vandalism, or trespass.

In the South Yorkshire Police's *Designing Out Crime* consultation response for another proposed local energy development (RB2025/0240) located on the same road as the Whitestone 3 site, the Police raised serious concerns about security vulnerabilities at remote solar and battery storage installations. They noted a national increase in thefts and intrusions at such sites and recommended a range of security measures — including an on-site security presence which then has further planning implications.

While Whitestone's Draft Environmental Statement includes fencing and CCTV, it makes no mention of any on-site security provision. Given the remote, dispersed nature of the Whitestone sites, this omission raises legitimate concerns about how the development would be safeguarded in practice, and how emergency services could respond effectively to incidents. The absence of a clear on-site security strategy calls into question the completeness of the Environmental Statement and the developer's understanding of rural policing realities.

Given the scale and isolation of the proposed site, reliance solely on perimeter fencing and remote CCTV is inadequate. These measures may protect equipment but do little to ensure public safety, rapid emergency response, or community reassurance. A robust, locally informed security plan — including coordination with South Yorkshire Police and provisions for emergency access — must form part of any credible submission before this project can be considered fit for approval.

Proposed Community Benefit

The community benefit proposed as part of the Whitestone development is extremely limited, particularly given the vast geographic footprint of the scheme and the number of both parished and non-parished communities affected. It will not compensate for the permanent damage to the local environment and the industrialisation of protected Green Belt land.

This project will have lasting impacts across multiple settlements, yet the proposed benefit is not scaled appropriately to reflect the number or size of those communities. Nor is it index-linked, meaning its real value will diminish over the 60-year lifespan of the development. Taken together, the contribution on offer falls far short of offsetting the loss of amenity, the reduction in property values, and the broader harm to wellbeing and landscape character.

Furthermore, the community benefit offer has been presented without clear governance or allocation criteria. Parish Councils and residents have not been told how funds would be distributed, who would manage them, or whether affected communities like Harthill and Woodall would receive direct support. In the absence of transparency or proportionality, the proposal cannot be considered either fair or credible.

A truly fair and future-proofed community benefit scheme should be proportionate, equitably distributed, transparent, and inflation-proofed—none of which are achieved in the current proposal.

Even if the financial offer were increased substantially, it would not alter the Parish Council's position. This is not a matter of price, but of principle. No sum of money can compensate for the permanent industrialisation of our countryside, the loss of productive farmland, and the erosion of the landscape that defines our community and contributes to our parishioner's well-being.

Conclusion

This proposal is not proportionate, safe, or fair. It is disproportionate in its scale and in the harm it would inflict on our Green Belt and farmland; unsafe because key environmental, traffic, and safety concerns remain unresolved; and unfair because the people who will live with the consequences have not been properly consulted or heard.

Harthill with Woodall Parish Council therefore formally objects to the Whitestone Solar Farm proposal in its entirety and calls for:

1. An independent review of the adequacy of the consultation process;
2. Full publication of all necessary environmental, transport, and cumulative impact data to ensure that the impact of the development can be properly assessed.
3. Proper exploration of brownfield and rooftop alternatives in line with national planning policy; and
4. The withdrawal or fundamental redesign of the current scheme.

This development would permanently and needlessly destroy the rural character of South Yorkshire's landscape, erode local food security, and impose long-term risk with limited national

gain. It contradicts the principles of sustainable development, environmental protection, and fair consultation enshrined in the Planning Act 2008 and National Policy Statements EN-1 and EN-3. This proposal represents permanent industrialisation of our countryside. It must not proceed.

Our community does not oppose renewable energy — we oppose poorly located, industrial-scale development that sacrifices valued countryside and community wellbeing for commercial convenience.

We therefore urge Whitestone Net Zero Limited to recognise this proposal for what it is — wholly unsuitable for this location — and to withdraw or substantially redesign it before progressing to the Development Consent Order stage. Should the developer proceed, Harthill with Woodall Parish Council will submit detailed representations to the Planning Inspectorate setting out these and further concerns in full.

Harthill with Woodall Parish Council stands united with our residents in defence of our landscape, our heritage, and our way of life.

Yours faithfully,



Caroline Havenhand

Clerk and Responsible Financial Officer

On behalf of Harthill with Woodall Parish Council

Appendix 1 – Photographs - Most points are elevated so no amount of hedging will screen the panels.

Appendix 2 – Adequacy of Consultation

Appendix 1 – Photographs of Key Viewpoints

Proposed access route down Public Footpath. The land to the left will be covered in panels.



View from West side of community woodland. This field is to be covered in panels



View from the east side of the community woodland. This field will be full of panels.



View from the Wildflower Meadow on Winney Hill. This will be transformed as most fields you can see will be panels.



View from the dam wall at the reservoir. This field will be all panels.



View from the sheep wash on Broad Bridge Dyke. This field will be full of panels.



Various Views from Hard Lane





Appendix 2

Inadequate Consultation and Representation

Freepost Address Errors and Reliability of Consultation

The Parish Council raised formal concerns regarding the accuracy and reliability of the Freepost address used for consultation responses. Royal Mail's Response Services Team has confirmed in writing that the address advertised by Whitestone — "*Whitestone Solar Farm, Freepost SEC Newgate UK Local*" — is not compliant with the Freepost Name licence held by SEC Newgate UK. The correct format, as confirmed by Royal Mail, should have been "*Freepost SEC NEWGATE UK LOCAL*" with any project name placed separately, not within the address block.

Royal Mail further confirmed that items addressed using Whitestone's incorrect format were initially flagged for surcharge or potential return, and that delivery has depended on manual intervention by Sheffield Mail Centre staff. They also noted that processing relied on items being posted from the "local catchment" — even though the Whitestone Solar Farm extends over 20 km (around 12 miles) from Conisbrough to Harthill, crossing multiple mail regions and adjoining counties. This means that responses posted from some parts of the consultation area, or from national organisations such as conservation groups, may not have benefited from that local intervention.

In short, Whitestone did not correctly advertise or operate its Freepost address in accordance with Royal Mail's licence, creating a risk of lost or delayed consultation responses. This failure undermines the accessibility and reliability of the statutory consultation process required under Section 42 of the Planning Act 2008 and raises serious doubt as to whether all public feedback has been properly received and recorded.

Such a basic administrative error does not inspire confidence in the developer's ability to deliver or manage a project of this scale. More concerning still is Whitestone's unwillingness to acknowledge or correct the issue when alerted by this Council and its Member of Parliament, suggesting a dismissive approach to local engagement and procedural accuracy.

Context and Capacity of Parish Councils

Whitestone Solar Farm is classified as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008. While this classification reflects its national importance, the project's impacts will fall most directly on small rural parishes like ours. Parish councils bring essential local knowledge to these processes — from flood risks and wildlife habitats to transport safety, heritage, and community well-being — ensuring that national decisions remain rooted in the realities of local life.

However, the Whitestone consultation highlights the significant challenges faced by small parish councils when engaging with the NSIP process. Harthill with Woodall Parish Council operates with limited resources, a part-time clerk, and volunteer councillors. In contrast, Whitestone Net Zero Limited is supported by a large team of professional planners, consultants, and lawyers. The material issued for this pre-consultation includes a full Draft Environmental Statement supported by dozens of lengthy technical appendices — hundreds of pages in total. It is simply not feasible for a small local council to read, cross-reference, and analyse this

volume of technical information within a six-week consultation window, particularly as presentations were halfway through that period.

Under the Planning Act 2008, an NSIP requires a minimum of 28 days for consultation. Yet this proposal — at 750 MW, fifteen times larger than the NSIP threshold — has been allowed only six weeks. Such a minimal extension is wholly disproportionate to the scale and complexity of the project. Given its vast footprint across multiple parishes, a consultation period of at least twelve weeks would have been more reasonable and consistent with the principle of meaningful public participation.

Furthermore, all these parishes have their own local sensitivities, environmental conditions, and community priorities. There is a genuine concern that, within such a vast consultation, individual parish perspectives will be diluted and that local voices will not be properly heard.

In addition, every document within the Draft Environmental Statement and its supporting materials combines data for Whitestone 1, 2, and 3 into a single set of references, tables, and appendices. This approach makes it extremely difficult for affected communities to identify which impacts relate specifically to their area. The Council therefore requests that in the next stage of this process, all data, mapping, and impact assessments be clearly separated and presented individually in separate PDF's for W1, W2, and W3 to enable proper understanding and scrutiny.

For these reasons, Harthill with Woodall Parish Council reserves the right to submit further detailed comments and evidence should the developer proceed to a Development Consent Order next year, when the full Environmental Statement and associated documents will be available for formal examination by the Planning Inspectorate.

Lack of Clarity, Accessibility, and Community Confidence

Beyond procedural issues such as the Freepost address, Whitestone's consultation has been marked by inconsistency, poor accessibility, and contradictory communication. At public events, staff repeatedly stated that the current layout was "final," yet at the same time, other Whitestone representatives were reportedly contacting landowners in additional parts of the parish seeking meetings with landowners of land outside the published boundary. Notices have also been seen in fields asking who owns the land — further suggesting that the red-line boundary is not, in fact, final. This inconsistency has created confusion and a growing perception that residents are not being told the full truth.

Several local landowners have described feeling bullied or pressured by the tone of these approaches, particularly around cabling routes. Some were warned that land might be taken by compulsory purchase, while others were contacted repeatedly by agents despite having declined involvement. Such conduct is wholly unacceptable during what is supposed to be an open and good-faith consultation.

Accessibility and inclusivity have also been poor. While the developer hosted a small number of drop-in events, no event was held in Kiveton — a community of over 7,000 people directly affected by Whitestone 3. By contrast, Northern Powergrid, when consulting on its own infrastructure upgrades in 2023, wrote to every household in the village and provided clear event information, ensuring that no resident was excluded. Whitestone's failure to take comparable steps — especially given the far larger scale of its proposal — represents a serious shortfall in public engagement.

Even for those who were able to attend events, attendees reported that many of the questions remain unanswered, meeting with vague responses or matters that were “still to be decided”. Printed copies of the large number of supporting documents were not proactively provided, and the developer made no reasonable adjustments for residents with limited internet access or disabilities.

Taken together, these issues show that Whitestone’s approach to consultation has prioritised corporate convenience over public participation. The process has left many residents feeling excluded, misled, and powerless, and it has eroded trust between the developer and the local community.

Accuracy and Competence of the Developer’s Assessment

The Draft Environmental Statement and associated consultation materials contain multiple factual inaccuracies and omissions that call into question the developer’s competence and capacity to manage a scheme of this scale. For example, the documents fail to acknowledge an existing 60-property housing development immediately adjacent to the proposed Whitestone 3 site, despite its clear relevance to visual, traffic, and residential amenity assessments. This is not a minor oversight but a significant omission that undermines the reliability of the Environmental Statement as a whole.

Such errors are symptomatic of a project that is simply too large for the developer’s current experience and resources. Whitestone Net Zero Limited currently manages approximately 200 MW of operational capacity across its portfolio; the Whitestone Solar Farm, at 750 MW, is more than three times that scale. The inconsistencies, omissions, and lack of local understanding evident throughout the documentation demonstrate that the applicant’s team is not equipped to handle a project of this magnitude responsibly or accurately.

These failings further reinforce the Parish Council’s concern that the consultation and supporting documentation are incomplete and unreliable, and that the developer’s internal systems lack the necessary rigour for a development of national significance.