



## **Representation to the Whitestones Solar Project**

**27<sup>th</sup> October 2025**

Prepared by Tony Wallace MRTPI on behalf of the CPRE Peak District and South Yorkshire

## 1 Introduction

- 1.1 The CPRE Peak District and South Yorkshire has a long history of campaigning for the countryside, its communities and for the natural environment to be adequately valued in decision making. The charity is acutely aware of the context of climate change and acknowledges the legitimacy of the reasons for achieving net zero, including a need for a more secure and cheaper energy supply from sources that do not cause significant damage to the environment and climate.
- 1.2 However, the scale of recent proposals for solar farms in England gives the Charity significant concerns at the likely adverse effects of large-scale solar schemes on many aspects of the environment and also on health and wellbeing, with benefits appearing to be exaggerated and impacts downplayed. The charity is concerned that this creates a situation where judgements on the balance between adverse impacts and benefits<sup>1</sup> are not adequately informed and at worst could be flawed.
- 1.3 The charities approach is broadly consistent with the national organisation CPRE in that it seeks the optimum benefits for rural areas and communities, whilst avoiding and reducing unnecessary economic, social, and environmental harms. When and where harms are thought to be justified by the decision maker then these must be properly mitigated or compensated for in accordance with the Environment Act 2021.
- 1.4 The charity wishes to see that the applicant has thoroughly applied the mitigation hierarchy and has demonstrated this, whilst also demonstrating that truly residual impacts will be compensated as far as possible. Currently it appears that the broad parameters published have the potential to be likely to result in significant adverse effects on the environment, with mitigation being inadequate and in places compensation not possible.
- 1.5 The charity believes that currently the Whitestones solar project does not demonstrate that it would achieve the right balance between harm and benefit, furthermore there are no clear local community benefits for those most affected. The charity therefore **OBJECTS** to the proposal. The charity also wishes to participate and make further representations should the project proceed to an application and examination.

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<sup>1</sup> The Planning Act 2008 requires that the SoS must consider if adverse impacts from a development outweigh its benefits, alongside the National Planning Policy Statements. See paragraph 1.1.4 of NPS EN-1.

## 2 The Whitestones proposals and broad concerns

### Clustering and scale

- 2.1 The proposal appears to represent spatially three significant broad ‘clusters’ of solar panels and associated development. This clustering would be exacerbated by other consented/permitted and proposed schemes and comes in a relative vacuum of spatial strategy for energy infrastructure, preceding the introduction of [Strategic and Regional Spatial Energy Plan’s](#), before a [land use framework](#) and before a Local Nature Recovery Strategy have been put in place throughout the application areas.
- 2.2 The clustering of schemes means that the NSIP process is to be used and prevents decision making by locally elected members which is concerning to the charity. It also means some of the consultation material is difficult for local residents to comprehend and the charity encourages the applicant to either split the Environmental Statement into 3 discrete volumes that deal with each cluster separately or to make the one Environmental Statement have more sections that clearly show baseline and also likely effects in a format that allows local residents and interested parties to focus on their locality. As it stands the work amalgamates many spatial elements of analysis and so is likely to be impenetrable except to the most determined reader with substantial time to devote to appraising the text. The prospective applicant is reminded that the Gunning Principles<sup>2</sup> require that there is sufficient information to give ‘intelligent consideration’ and in essence that the information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response. Furthermore, that adequate time is given for a response. The prospective applicant is encouraged to extend the consultation period for another 4 weeks and to break up the draft ES into W1, W2 and W3 specific elements with an element that provides an overview. The website for the consultation has had an important appendix (mitigation plan) unavailable for at least five days.

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<sup>2</sup> ‘Gunning principles’ as described by Stephen Sedley QC as approved by Hodgson J in R v. Brent LBC ex p Gunning and endorsed by the Supreme Court in R (Moseley) v Haringey London Borough Council [2014] UKHL 56; [2014] 1 WLR 3947

- 2.3 There are other projects for solar farms under 50MW (albeit still major developments) in proximity to the development which the charity believes should be factored into the proposals consideration of impacts in the Environmental Statement as ‘in-combination’ effects, and should also be provided for consideration by the Planning Inspectorate (PINS). These other projects include the Thurcroft Energy Park [RB2025/0714](#), the numerous Battery and Energy Storage Systems (BESS) to the south east of Wickerlsey, the Carr Lane Solar farm near Ulley [RB2025/0029](#), and the Common Farm solar project near Laughton Common [RB2022/1203](#). The Scoping Opinion by the Planning Inspectorate clearly requires an agreed list with Local Planning Authorities and for this to be shown figuratively and kept up to date. The PINS Scoping Opinion appears reasonable in that it opines that inter-visibility between schemes should not be the only consideration. Wholesale harmful landscape scale change in the character and use of the countryside, and natural capital, needs to be avoided, by well informed decision making which takes into account multiple consented/permitted and proposed projects under different consent/permission regimes that affect whole landscape areas.
- 2.4 There are projects not listed such as [25/01554/FULM](#) which is in a nearby landscape types near Maltby and this illustrates the need for the applicant to provide comprehensive information to PINS to consider the cumulative effects of the ‘mega’ solar proposal when considered alongside other smaller but substantial projects which together have the potential to fundamentally alter the wider landscape in Doncaster and Rotherham Local Authority areas. The charity will review the list of other projects and reserves its ability to raise to PINS attention ones of particular concern should the Whitestones project be submitted as an application and not provide a comprehensive list to allow PINS to see the implications for a substantial part of South Yorkshire.

### Justification

- 2.5 The justification for the proposals is likely to be an overarching critical national need<sup>3</sup> for low carbon infrastructure and the applicant is likely hoping for substantial weight to be afforded as a result. However, a queue of around 738GW for clean energy schemes to be connected was recorded by [NESO \(National Energy Systems Operators\)](#) on the 8<sup>th</sup> July 2025 which was ‘*more than four times the clean generation capacity required by 2030*’. It is still not clear what energy schemes will remain committed following a re-prioritisation by NESO and so it is not clear if the solar farm is strictly necessary to meet a critical need, and if instead it represents primarily commercial convenience and ambition that is only limited by the draft ES findings and land availability.

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<sup>3</sup> Section 4.2 of NPS EN-1 ‘The critical national priority for low carbon infrastructure’.

- 2.6 The charity believes that more is needed to be done nationally to increase the amount of [solar provided on rooftops](#), on previously developed land and in built up areas, and so to protect valuable natural capital from excessive 'mega solar' and also provide benefits locally.
- 2.7 The published online material has suggested that the proposal would generate enough energy to power around 250,000 homes. However, aside from differences between total installed capacity and declared net capacity, the theoretical maximum electrical outputs are not what will likely happen in practice. Factors such as weather and temperature variability (including frost and ice), panel ageing, dust can degrade output<sup>4</sup>. The prospective applicant and also the decision maker should consider the likely fluctuations and degradation over time in output, and not just rely on a theoretical maximum.
- 2.8 The proposed project does not currently propose a means of direct benefits to local resident's and communities with cheaper electricity or a community fund. Cheaper electricity is not guaranteed<sup>5</sup>. The charity believes that some local benefit should be established should consent be given, including community funds, cheaper electricity, priority for local labour and supply during the construction and operational phases to provide direct socio-economic benefits to the communities most affected. Also, should consent be given a fund established to accrue money (inflation linked) to provide guaranteed funds for decommissioning. The charity encourages the developer to put in place a rationale, mechanism and the means for this.

#### Project Lifespan and Decommissioning

- 2.9 The proposal may need replacements of equipment on a significant scale within a short timeframe within the 60-year period expected by the applicant as the projects operational period. The Environmental Statement<sup>6</sup> indicates a 25-30years lifespan for PV modules, 10-20years for inverters and 5-15years for batteries. Other solar farm schemes have given around 30-40 years as a lifespan for projects. The potential for substantial replacements of equipment to happen in a relatively short time frame should be considered within the Environmental Statement and the likely impacts assessed accordingly, with any DCO issued also factoring such considerations in, in terms of what is consented throughout the projects lifespan and at what point a new submission would be needed for replacement equipment. The concern is that the 'Rochdale Envelope' approach used is too broad and the DCO sought too widely described to avoid uncertainty over whether or not the EIA Regulations have been

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<sup>4</sup> [\(PDF\) Performance Ratio and Degradation Rate Analysis of 10-Year Field Exposed Residential Photovoltaic Installations in the UK and Ireland](#)

<sup>5</sup> [Britain's energy bills problem – and why firms are paid huge sums to stop producing power: BBC indepth 9th June2025](#)

<sup>6</sup> Whitestones Solar Farm, Draft Environmental Statement: Vol 1, Ch5, Page 24, Table 5.9

complied with. Is the DCO effectively to allow the substantial replacement of solar panels, battery storage, inverters and cabling at least once during the project's lifespan? An example of where the draft ES should factor in substantial replacement of equipment is the emission of greenhouse gases and carbon.

#### Future Baseline

- 2.10 The draft ES takes the view in paragraph 6.6.68<sup>7</sup> that in the short to long term if the development were not to happen, standard agricultural management would continue and that it would likely mean continued declines in most U.K species. This opinion appears to not take into account the possibility and potential for parts of the project area to be identified in the South Yorkshire MCA Local Nature Recovery Strategy, and within a new tranche of Local Plans as core habitat and areas for nature recovery, including areas of particular importance and also areas safeguarded as having the potential to become of particular importance through the delivery of LNRS measures. This seems to be a significant oversight especially given that biodiversity net gain is now mandatory and a market is developing for receptor sites and delivery.
- 2.11 There is also a circular argument made in respect of the baseline for landscape character in relation to W1 and W2<sup>8</sup> whereby it is assumed that pressure for development around urban areas and the countryside will be a force of change and that in the absence of the proposed development, it is predicted that the landscape character would evolve to include additional energy developments eroding elements of the key characteristics. However, this presumes consents and permission will be given/granted to result in harm. A blanket generalisation arguably is too broad and the visual and landscape impact of specific proposed development's/projects and plan allocations should be factored into the consideration of future baseline.
- 2.12 Best and Most Versatile Agricultural Land and Agricultural Productivity
- 2.13 Paragraph 5.11.12 of NPS EN-1 requires applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5). The proposal appears to be driven mainly by connectivity to the national grid and land availability, with a disregard for avoiding land which is best and most versatile. The charity wishes to see the best and most versatile land protected for productive agricultural use to support food security over the next 60 years. Much of the project is on land that is productive farmland for arable and not grazing.

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<sup>7</sup> Draft Environmental Statement: Vol 1, Chp 6: Biodiversity and Nature Conservation

<sup>8</sup> Draft Environmental Statement: Vol 3, Appendix 7.3 Landscape Character Assessment Paragraphs 7.3.222 and 7.3.223

2.14 The preliminary assessment has identified a moderate adverse effect on the availability of Best and Most Versatile (BMV) agricultural land due to the inclusion in the solar farm of approximately 160 ha of BMV land. It's claim that the effect will reduce following construction by any use of the solar land for grazing purposes during the operational life of the solar farm should be re-examined by the applicant, as the majority of the land in question appears to be in arable use and not for grazing. The claim that the change of use is temporary and reversible as following the decommissioning phase the land will be available for normal arable as previously should also be re-examined, as arable land cannot necessarily be left unworked and still maintain its potential for productivity. The assumption that other sites within the Zol will see less than >10% BMV developed is potentially an underestimate. The project comes at a time when surrounding LPA's are subject to significantly higher housing targets that will emerge into plans in the next five years and will no doubt result in the loss of more BVM. The cumulative/in-combination effects appear underestimated.

#### 2.15 Cable Run Options

2.16 The information provided appears to be too broad and lacks more detailed surveys and assessments in respect of species and habitats. The scope of options is prohibitive to local communities wishing to comment as there are many variables and possibilities, limiting effective participation by the public in the process.

#### 2.17 Future Consultation

2.18 The prospective applicant seeks to leave many matters of mitigation and detail to a later stage presumably in an application. The applicant is encouraged to conduct a further round of consultation following taking into account the representations made at this stage and also with the benefit of more detailed survey and assessment information on matters such as; highways access and construction plans and assessment; groundwater surveys; protected and priority species surveys.

### 3 Conisbrough Parks – Whitestones 1 (W1)

- 3.1 The area is mainly within the Landscape Character Type '[Conisbrough and Denby Coalfield Farmlands](#)' as described within the Doncaster Landscape Character and Capacity Assessment (DLCCA)<sup>9</sup>. It also includes mostly 'surveyed enclosure' (Parliamentary/Private) and 'piecemeal enclosure' Historic Landscape Character Types with also some 'agglomerated fields' as identified within the [South Yorkshire Historic Environment Characterisation Project](#) in 2013 which built on Historic Landscape Characterisation studies across South Yorkshire.
- 3.2 The DLCCA sums up the area as; *This simple, intact historic landscape is designated as an Area of Special Landscape Value. It is a strongly rural and in places tranquil landscape due in part to the lack of roads. There are some long views to urban areas, but overall the landscape value and quality are considered to be high.*
- 3.3 The DLCCA concludes that there is low to no capacity for numerous types of development including large scale forestry, tree planting for biomass crop, minerals working, wind turbines, employment and housing. It is reasonable to think that the landscape has low to no capacity for solar farms and battery storage.
- 3.4 When taking Conisbrough Parks landscape characteristics and features into account including its dramatic setting of Conisbrough Castle it is arguably valued in the sense of paragraph 187 of the NPPF with demonstrable physical attributes beyond the ordinary. It is visible from within and from high ground to the south, west, east and north beyond 3km including views to and from Conisbrough Castle (Grade 1 Listed Building and a Scheduled Ancient Monument) as demonstrated to a degree by Figure 7.5.4 in the draft Environmental Statement. The area is crossed by a public right of way network which provides those living in nearby towns and villages with an important area of countryside for informal recreation with benefits to health and well-being. The area is accessible to and near to communities with high levels of deprivation<sup>10</sup> such as Conisbrough, Mexborough, Old Denaby and Hooton Roberts.

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<sup>9</sup> [Doncaster Landscape Character and Capacity Assessment 2007](#)

<sup>10</sup> English Indices of Multiple Deprivation 2019



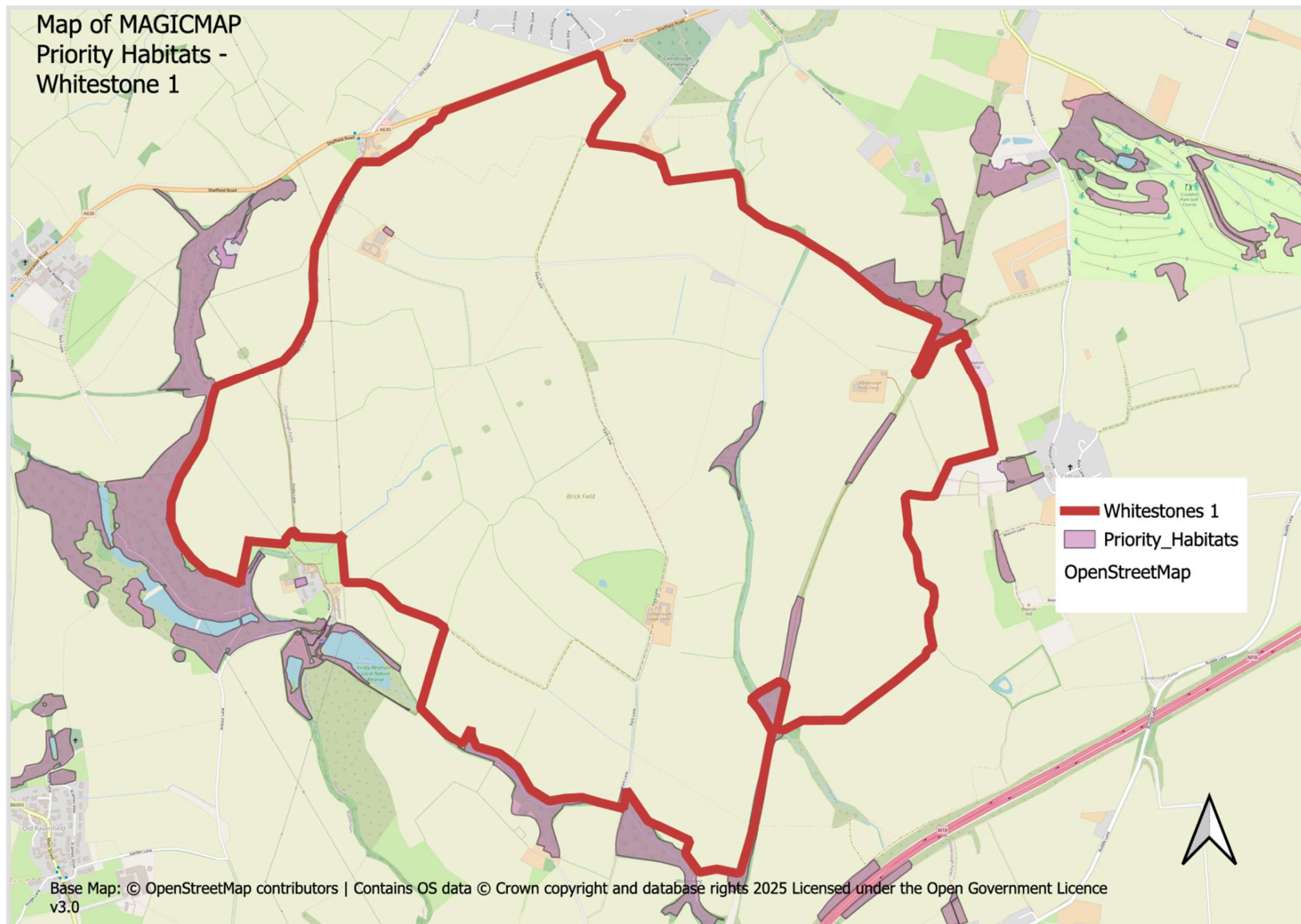
- 3.5 Views from and to Conisbrough Castle are striking and of heritage significance, whilst the field patterns within the area are also of historic landscape significance. The viewpoints are numerous from Conisbrough Parks but include the views from the Bridleway 'Park Lane'. The proposal appears to have the potential to cause substantial harm to the setting of the castle, in particular when viewed from public footpaths and Bridleways in the Conisbrough Parks area, and also views from the Castle's Keep. The Draft Environmental Statement does not appear to serve as an adequate detailed assessment of the heritage significance of views to and from the castle factoring in the historic field patterns present. It also does not appear to present an adequate heritage impact assessment, as the impacts appear to be likely to be substantial harm to the setting and a harm not mitigable despite the draft ES findings. Arguably the harm would outweigh the claimed benefits.
- 3.6 The draft ES refers<sup>11</sup> to the Roman Villa (a Scheduled Ancient Monument) within the site and the high potential for Romano-British assets but its significance and relationship with the field systems and landscape around the Villa does not appear to be appropriately weighed within the assessment of landscape character and of cultural and historical heritage. Furthermore, the risk of harm through physical changes including damage doesn't appear to be adequately weighed into the assessment, should there be any hitherto unfound archaeological remains. Whilst the SoS can factor this into a DCO the draft ES ought to effectively consider the potential impacts and uncertainties.
- 3.7 The site contains priority habitat (Native Hedgerows, Arable Field Margins, Woodland) and also adjoins priority habitats (woodland) and a Local Nature Reserve (Firsby Reservoir), as visible on site and mapped on the [DEFRA MAGICMAP database](#). It seems likely that any forthcoming local nature recovery strategy (LNRS) by the South Yorkshire Mayoral Combined Authority (SYMCA) will build on the existing core ecological network in the locality and so seek to create buffers, measures and recovery areas that cross into the W1 red line boundary. The evidence base and the proposal as currently shown appears to fail to have regard to the existing priority habitat network as part of the wider ecological network and also does not appear to have had regard to the evidence in the [National Habitat Network map](#) on network enhancement zones as prepared by [Natural England in 2020](#). Buffers provided appear to be minimal.
- 3.8 The proposed mitigation plan was not available online for a number of days. The text in the draft ES appears on mitigation appears mainly to be generic in scope, not site specific nor detailed and appears to refer primarily to improvements to grassland and seems to prioritise the Biodiversity Net Gain trading rules over a coherent and strategic approach at a landscape scale to nature recovery.

- 3.9 The proposed site has areas which arguably would be rational extensions to a Local Nature Recovery Network with a view to helping achieve the objectives of the national [Environment Plan and its target of 30 by 30](#). These areas would allow the expansion of the existing priority habitat present to reduce habitat fragmentation. It would improve coherence of the network between Silverwood Siding, Ravenfield, Hooton Brook, Ravenfield Gorse, Firsby Reservoir, Micklebring Gorse and beyond. The priority areas in question are shown below:

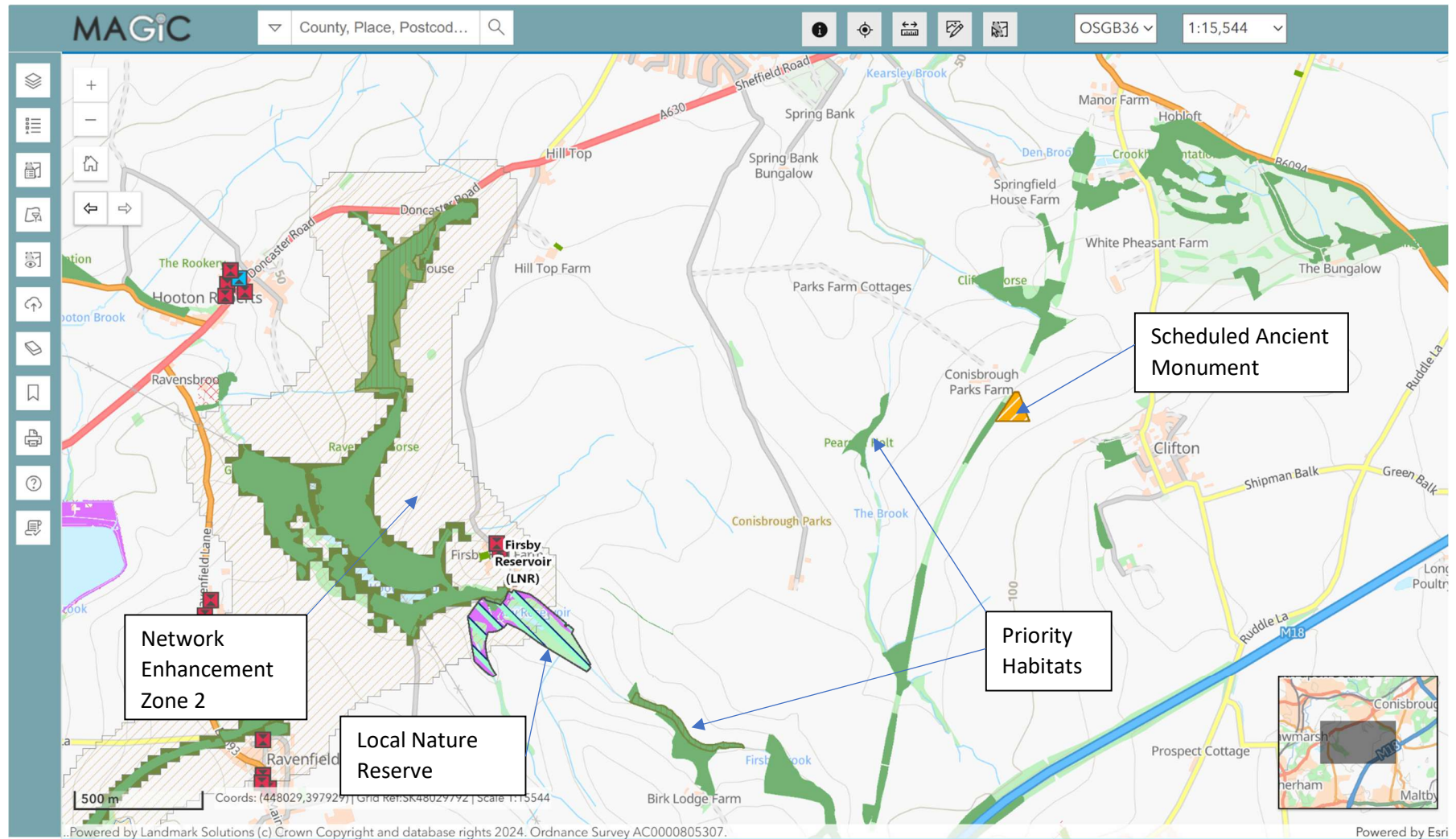
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<sup>11</sup> Draft Environmental Statement Volume 3, Appendix 8.2: Cultural Heritage Baseline: paragraph 8.2.22 and 8.2.222

MAP 1: Woodland Priority Habitats – [Natural England's Habitats Networks Open Data: data.gov.uk](https://data.gov.uk)

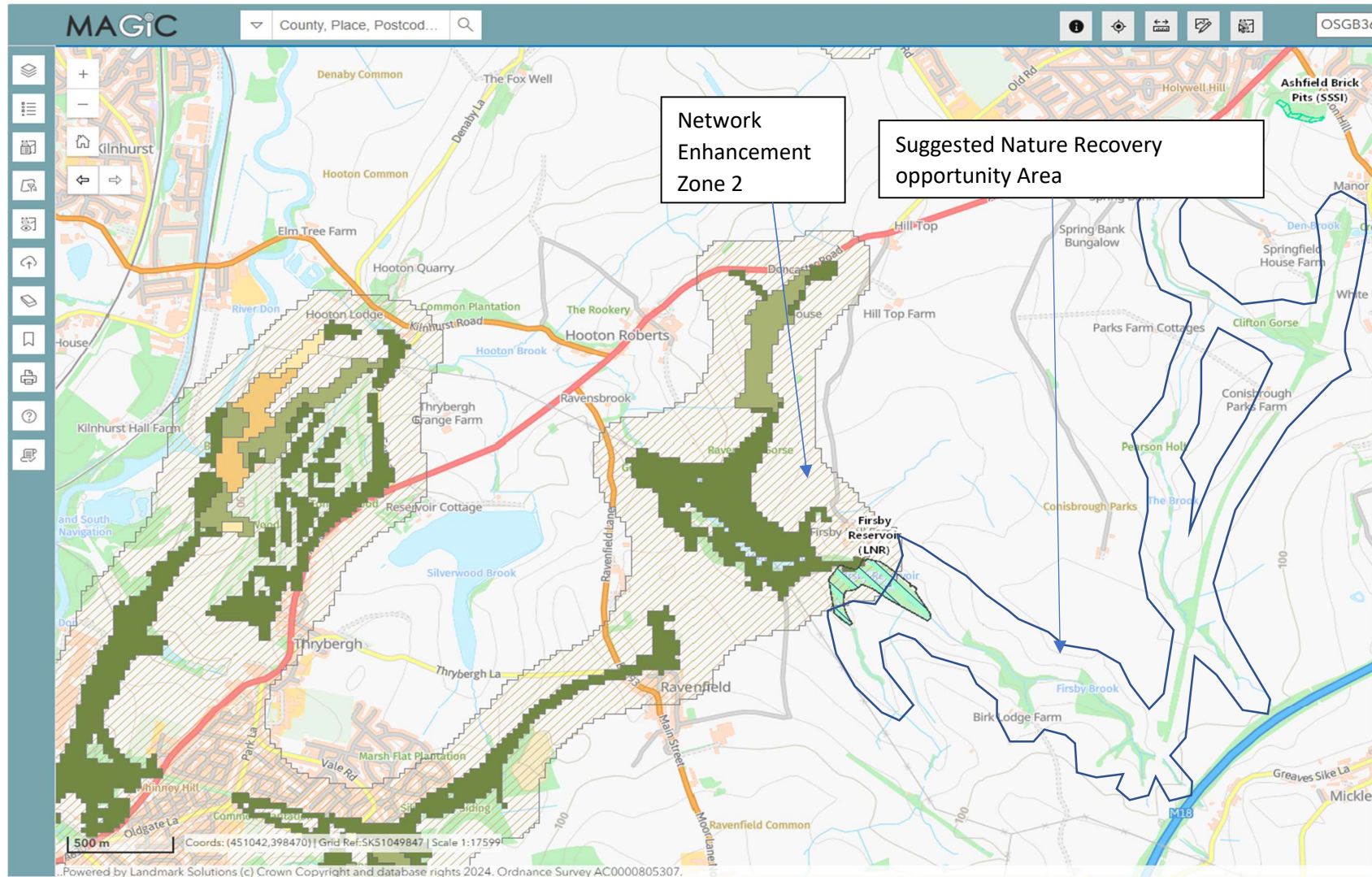


Map 2: Priority Habitats and woodland network recovery areas W1 area





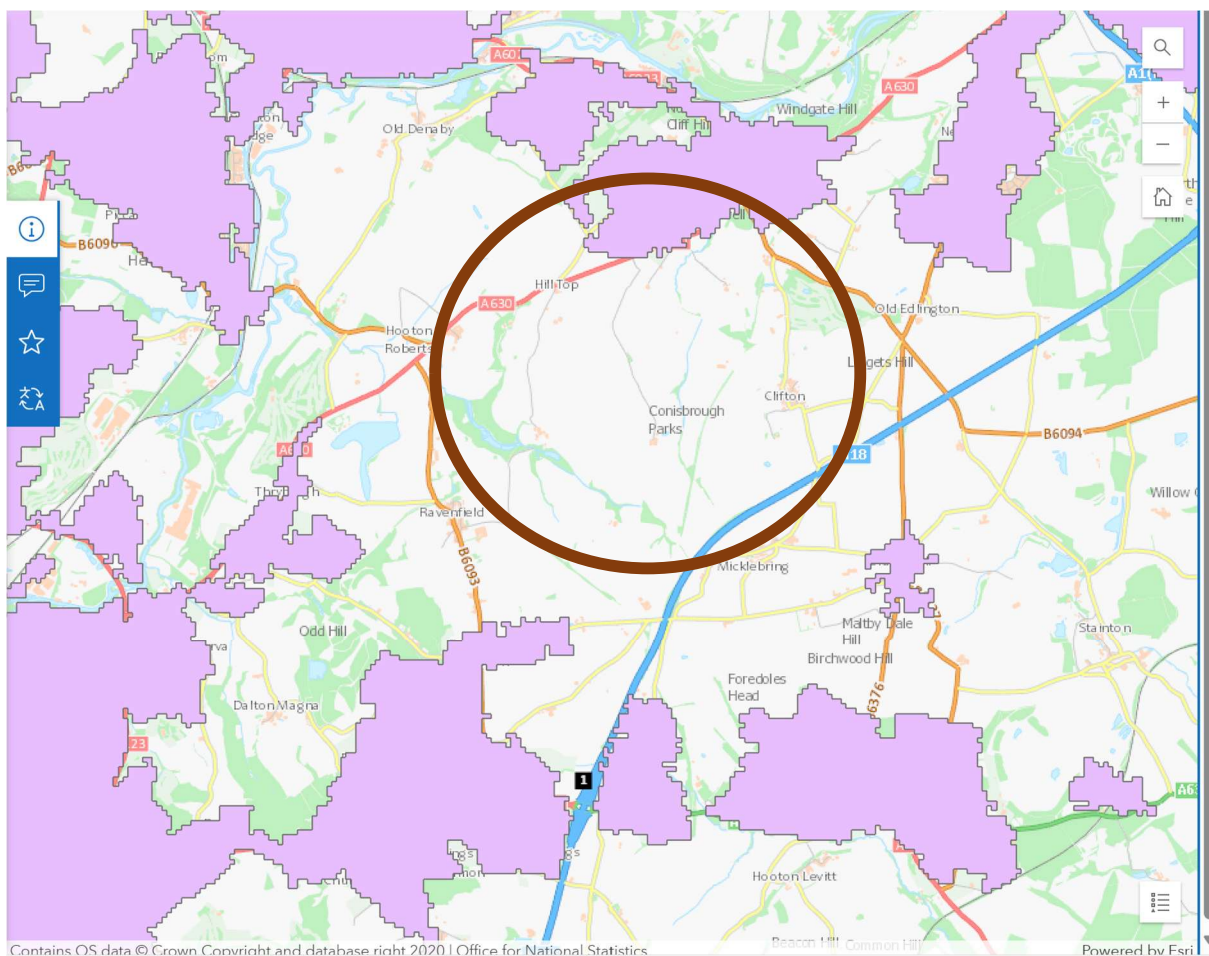
Map 3: Suggested areas to safeguard from W1 development and to introduce nature recovery measures such as new woodland creation.



3.10 However, whilst logical areas exist for nature recovery the charity has concerns that the amount of tree and shrub planting necessary to effectively screen the development from view in the landscape would be significant in its effect on landscape character and equally damaging to the existing valued character of the area in line with the conclusions in the DLCCA regarding what in essence is low to no capacity for industrial scale changes to the landscape including tree planting for forestry.

3.11 In comparison to the surrounding pattern of development, the wider area within which the development would sit is relatively and remarkably free from the adopted highway network, infrastructure, buildings and urbanisation. A 'gem' within a wider landscape dominated in many places by urbanisation, industry and the legacy of industry. It has open aspects over fields and hedgerows towards Conisbrough.

Map 4: Conisbrough Parks on ONS Open Data Map showing Built Up Areas:  
Source: Office for National Statistics licensed under the Open Government Licence v.3.0



- 3.12 The draft ES is concerning given that it finds the value of the landscape as medium when it appears on face value that Conisbrough Parks is likely to have significant/high local value in terms of paragraph 187 of the NPPF when considering its Natural and Cultural Heritage, Historical Associations, Distinctiveness, Recreational use, Scenery and relative Tranquillity and a Spatial Function in respect of nature protection/recovery and farming using the categories in the Landscape Institute's Technical Guidance Note (TGN) Landscape Value and Valued Landscape Consultation 02/21. The draft ES does not appear to address this aspect of 'valuation' adequately. The landscape and site appears to the charity to be unsuited to large scale industrial solar development, with likely significant effects on landscape character, visual amenity, cultural and historical significance and on opportunities for nature recovery, and in respect of landscape character, visual amenity, cultural and historical significance, neither mitigation nor compensation is likely to be possible without significantly reducing the extent of the W1 proposal. The draft ES finding of moderate adverse (significant) effects to landscape character appears to be an underestimate as would its finding of a medium value for the landscape.
- 3.13 The proposal would substantially harm the intrinsic beauty and character of the Conisbrough Parks countryside and in turn would substantially degrade the beneficial experience provided by the public footpath and bridleway network throughout the site, these routes being part of the Local Authorities Green Infrastructure network. Screening vegetation if employed is likely to reduce open vistas from Park Lane to corridors of vegetation. Mitigation does not appear to be possible without harming the character and openness of the landscape
- 3.14 The adverse visual and spatial effect on the openness of Green Belt is likely to be significant and not mitigable.

#### **4 Ulley, Treeton, Brampton-en-le-Morton – Whitestones 2**

- 4.1 The area is mainly within the Landscape Character Area 'Central Rotherham Coalfield Farmland' but has a substantial portion in the 'Coalfield Tributary Valleys – Treeton' area as described within the Rotherham Landscape Character assessment and Capacity Study (RLCACS). It also includes mostly 'agglomerated fields' Historic Landscape Character Type as identified within the South Yorkshire Historic Environment Characterisation Project in 2013 which built on Historic Landscape Characterisation studies across South Yorkshire.
- 4.2 The RLCACS lists the key characteristics and distinctive features of the Central Rotherham Coalfield Farmland which include large scale arable farmland with some woodland blocks and panoramic wide-angled views to the south west horizon towards Sheffield (and the Peak District), and the village of Brampton-en-le-Morthen with its farming origins. The Treeton sub area of Coalfield Tributary Valleys' is described being more heavily affected by urban areas but is clearly treed arable farmland with fragmented woodland blocks and has undulating landform. The RLCACS advises that both character areas should be improved and conserved.
- 4.3 Whilst the Rotherham UDP 1999 Areas of High Landscape Value are now superseded, the development's location within one of these areas formerly Local Plan designated is concerning. The RLCACS concluded that the landscape affected by W2 is either of moderate to moderate-low sensitivity and that the Areas of High Landscape Value were not supported by evidence. However, the assessment did not specifically consider landscape wide industrialised solar development and also did not carry out detailed enough work to re-identify any areas which would now be locally valued in the sense of paragraph 187 of the NPPF. The prospective applicants' work does not carry out the necessary assessment to identify locally valued landscapes. The proposal would adversely effect a substantial part of the landscape which sits between Treeton, Aughton-Aston and the M1 motorway when considered in combination with the solar farm planning application [RB2025/0029](#) . The moderate adverse (significant) effect identified in the draft ES for the Central Rotherham Coalfield Farmland Landscape Area appears to underestimate the developments effects, given the public visibility and the openness of the landscape and the scale of the development.
- 4.4 The area is crossed by a public right of way network which provides those living in nearby towns and villages with an important area of countryside for informal recreation with benefits to health and well-being. The area is accessible to and near to communities with high levels of deprivation such as Thurcroft, Aughton, Treeton and Dinnington. Viewpoints from Ulley Footpath No.5 from Ulley towards and past Spring Wood would be transformed from countryside with intrinsic beauty and character to a landscape littered with solar panels, with the topography and sheer extent of the proposals preventing effective screening both for short and medium range views.



- 4.5 Priority habitat is mapped on the Natural England MAGICMAP within the sites area and the western element of W2 covers an area identified as having potential for enhancing the ecological network around and between Treeton Wood and Burnt Wood, both woodlands being identified as Ancient Woodland.
- 4.6 The W2 project comes before the publication of a Local Nature Recovery Strategy for South Yorkshire, and the charity understands from the Sheffield and Rotherham Wildlife Trust that significant progress had been made on the LNRS and that evidence has been prepared identifying areas of particular importance and opportunity/recovery areas. In line with PINS scoping opinion the developer should engage with SYMCA on the evidence prepared to date for the LNRS and have regard to this in their proposal in respect of assessing effects on the core ecological network, and on national and local planning aims for nature recovery. Areas safeguarded from development and also mitigation should factor in nature recovery at a strategic landscape level
- 4.7 The adverse visual and spatial effect on the openness of Green Belt is likely to be significant and not mitigable.



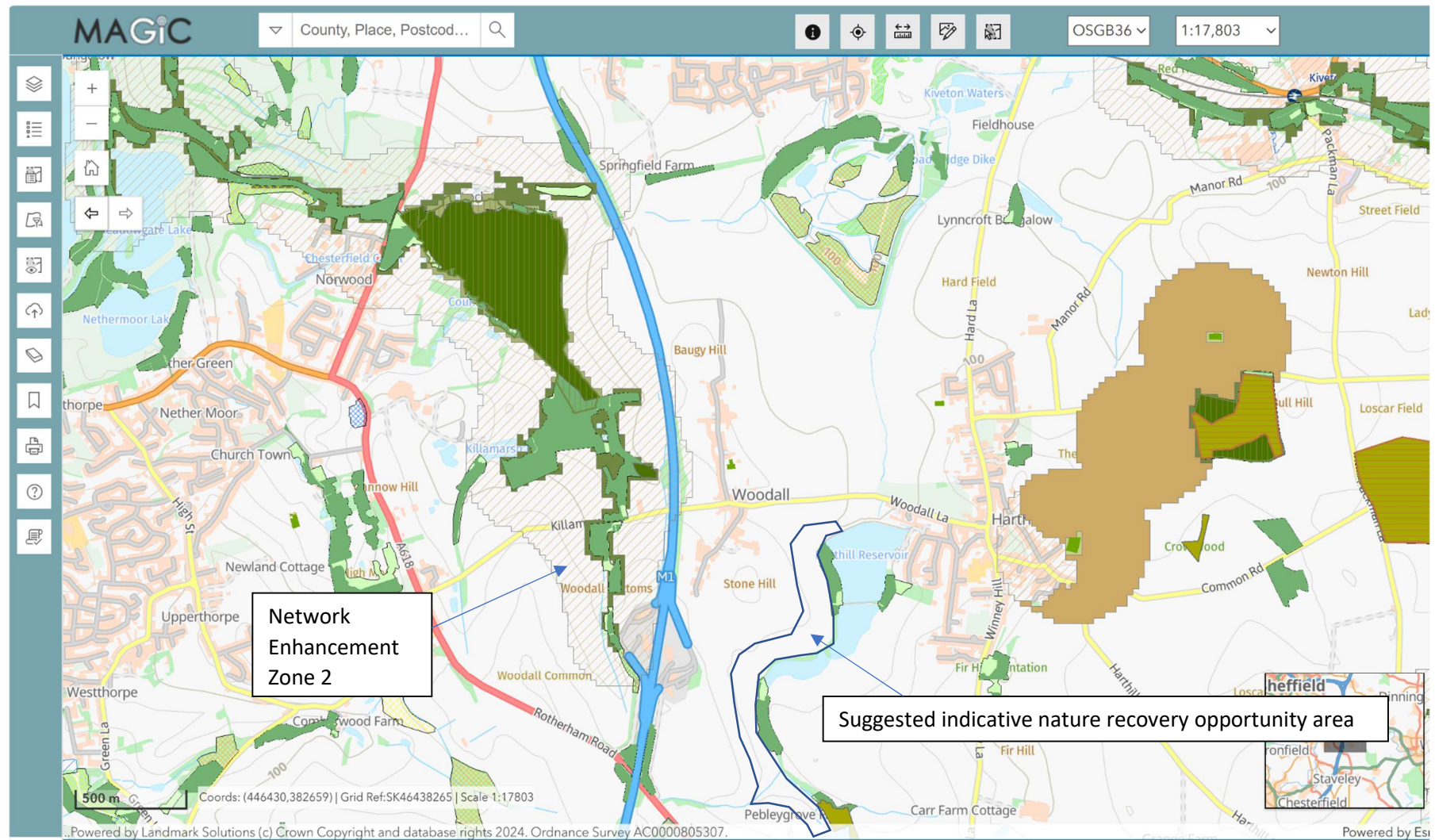
## **5 High Moor, Woodall, Kiverton, North Anston – Whitestones 3**

- 5.1 The area is mainly within the Landscape Character Area 'Central Rotherham Coalfield Farmland' area with the smaller eastern element of the proposal in the 'Rother Valley Reclaimed Farmland' as described within the Rotherham Landscape Character assessment and Capacity Study (RLCACS). It also includes 'strip fields' Historic Landscape Character Type to the west of Harthill Reservoir and 'Surveyed Enclosure: Parliamentary/Private' as identified within the South Yorkshire Historic Environment Characterisation Project in 2013 which built on Historic Landscape Characterisation studies across South Yorkshire.
- 5.2 The RLCACS lists the key characteristics and distinctive features of the Central Rotherham Coalfield Farmland which include large scale arable farmland with some woodland blocks and panoramic wide-angled views to the south west horizon towards Sheffield (and the Peak District). The RLCACS advises that the character area should be improved and conserved.
- 5.3 The RLCACS concluded that the landscape affected by W3 is of moderate sensitivity. However, the assessment did not specifically consider landscape wide industrialised solar development and also did not carry out detailed enough work to re-identify any areas which would now be locally valued in the sense of paragraph 187 of the NPPF. The prospective applicants work does not carry out the necessary assessment to identify locally valued landscapes. The moderate adverse (significant) effect identified in the draft ES for the Central Rotherham Coalfield Farmland Landscape Area appears to underestimate the developments effects, given the public visibility and the openness of the landscape and the scale of the development. Screening vegetation should be used to hide the development from views to those walking around Harthill Reservoir including native hedgerow, shrubs and trees. Similarly, vegetation ranging from hedgerow to trees should be used to screen the development from view on Woodall Common alongside a change to layout to remove panels from the high ground. A wider area of planting is necessary to the edges of Kiverton Community Woodland to screen the development from the footpath network, with screening planting also necessary to the east between Hard Lane and the proposed solar panels.

- 5.4 Priority habitat is mapped on the Natural England MAGICMAP within the sites area and the western element of W3 covers an area identified as having potential for enhancing the ecological network on Woodall Common.
- 5.5 The W3 project comes before the publication of a Local Nature Recovery Strategy for South Yorkshire, and the charity understands from the Sheffield and Rotherham Wildlife Trust that significant progress had been made on the LNRS and that evidence has been prepared identifying areas of particular importance and opportunity/recovery areas. In line with PINS Scoping Opinion the developer should engage with SYMCA on the evidence prepared to date for the LNRS and have regard to this in their proposal in respect of assessing effects on the core ecological network, and on national and local planning aims for nature recovery.
- 5.6 Areas safeguarded from development and also proposed mitigation should factor in nature recovery at a strategic landscape level. Map 5 shows the Natural England network enhancement zones and a suggested nature recovery area to make the existing woodland and edge of woodland habitat along the side of Harthill Reservoir larger and connect to other priority habitat further south. Harthill Reservoir and Kiverton Community Woodland are landscape features and recreational assets, and the footpath networks around them are valuable to local communities health and wellbeing and their setting is integral to their value. Views from the footpath's networks should be protected through effective screening planting.
- 5.7 The adverse visual and spatial effect on the openness of Green Belt is likely to be significant and not mitigable.



Map 6: Priority Habitat and Network Recovery areas W3 area



## **6 Conclusions**

- 6.1 The introduction section of this representation serves as overall conclusions. It is worth reiterating that the charity does support the use of renewables and the move towards net zero. However, the proposal gives rise to some significant concerns at environmental impact and does not demonstrate 'integration' into the landscape nor a scheme which recognises and respects the intrinsic beauty and character of the countryside in South Yorkshire. Local community benefits do not appear to be part of the project.
- 6.2 It seems uncertain that the W1 area can accommodate any major solar farm development without significant landscape character and heritage harms, whilst the W2 area would see significant harm to landscape character as a result of the scale of the development. W3 is lesser in scale yet there is a need for more of the site area to be devoted to screening vegetation and nature recovery in order to mitigate adverse effects on the environment and also achieve national and local nature recovery aims.
- 6.3 A significantly reduced project in terms of extent of solar panels and BESS sites would be desirable in order for benefits to be able to outweigh harms. Given the likely significant effects and potential for mitigation and compensation not to be possible, the prospective applicant is encouraged to produce a further ES with an amended scheme for a further consultation period prior to an application being made.