

Clean Air Solar Scoping Report Feedback July 2026

As a parish, we object strongly to the proposal; not because we object to solar, but because we object to solar in the wrong place, which in this instance is on productive agricultural land in a rural area with a farming heritage spanning generations.

Having done our best to understand the contents of the report in such a short period of time, our response is set out below:

We believe the document is inaccurate, omitting key details and making incorrect and illegitimate assumptions, and do not see how this can be proposed as a single development. In the first instance, the Northern Sector was a 'bolt-on' to the Hornsea 4 Development, intended to utilise capacity, and has now become the 'bolt-on' to the Southern Sector proposal. It is presumed that this has been done to take advantage of the new, fast-track NSIP process included in the Planning and Infrastructure Act (2025), which is less explicit about the consultation required for such proposals.

Our concerns relate to the following:

1. Two Separate Proposals:

In 2.13 they state that:

'The land parcels are integral and complementary parts of the Proposed Development and are not standalone or alternative sites'.

This is clearly not the case, and the fact that the developer feels the need to claim this is a clear indication that it is not a single proposal at all. Throughout the document, in every chapter heading, the significant differences between the Northern and Southern Parcels are abundantly evident. The two parcels of land are separated by approximately 6 miles at their closest points and 12 miles at their furthest.

The Northern Parcel is low-lying and very flat, with predominantly Grade 3a soil quality, grading to 3b closer to the natural Carr land. In contrast, the Southern Parcel is high-lying and undulating due to its position on the edge of the Yorkshire Wolds. It sits on the East Yorkshire Chalk Aquifer and has 99% Grade 2 and 3a soil quality.

The Northern parcel sits adjacent to several flood zones and is part of the drainage infrastructure for the Yorkshire Wolds, whilst the Southern Parcel sits directly above a Critical Drainage Area within England's second-highest flood-risk area outside London.

The Northern Parcel has fewer Buried or Built Heritage sites or buildings, whilst the Southern Parcel is covered by them, including a 74-acre Heritage Asset in its centre, which the Developer somehow believes will be incorporated into the site.

These contrasting profiles will require distinct technical solutions for each chapter heading, from Biodiversity (6) right through to Land Quality and Groundwater (18). We contend that the co-joining of these two completely separate parcels of land into one proposal is a cynical and perverted attempt by this developer to surreptitiously take advantage of the new planning process, making it impossible for local residents to present a single, coherent argument against key elements of the proposal.

The key stakeholders for each parcel are entirely different, and the artificial combination of these two proposals introduces a significant bias at all stages of the forthcoming Consultation and Assessment process in favour of the developer, to the detriment of local communities, who are aghast that this proposal could even be submitted, let alone considered.

2. Lack of any Site Selection Criteria within Scoping Report:

There is no reference explaining why the two parcels of land have been identified in the first place. This omission is critical, as the report itself recognises that the official ACL classification for the Southern Parcel is 99% Grade 2 and 3a, and is clearly well within the definition of 'Best and Most Versatile' land. As such, there is a mandatory requirement for the developer to prove that a full investigation into all other possible sites within a defined search area has been undertaken, including Grade 3b, 4 and 5 land, brownfield sites, and other suitable places such as car parks and roofs of large buildings, all of which are readily available in and around the Humber, in Hull's neglected, abandoned industrial areas, and along roadside and rail corridors.

Despite repeated requests by this Parish, as part of the Action Group, for details of such searches since 12 May 2026, the developer has steadfastly refused to provide this information, despite the following statement in their new information booklet:

'We undertook an extensive site selection process to identify locations which can support a large scale solar farm and are capable of maximising the amount of renewable clean energy that is needed in our grid connection agreement... following technical and environmental assessments, along with other considerations such as land ownership and deliverability, suitable locations were identified... and as a result of the assessment of suitable sites within the search area, the Northern and Southern land Parcels were identified as the most suitable locations.' We strongly contest this statement and regard it as an attempt by this developer to get this proposal into the new process without completing this first, obligatory step.

On all 3 Public Information Days, the developer was repeatedly asked by a wide range of people to provide details of the search area and which locations were investigated, identified and discounted. There was a continual denial that this information was available.

However, several members of the Clean Air Team manning the various desks confirmed that the reduction of 1000 acres from the Northern Parcel, compared with the previous Kingfisher Proposal, was due to some of the landowners either 'pulling out' or 'not playing ball' (their words). Furthermore, it was confirmed that the land in the Southern Parcel was included in the proposal to compensate for the reduced footprint of the Northern Parcel, and that this could be done quickly and effectively by dealing with one single large landowner who owns all of the land in the Southern Parcel and is already working collaboratively with the owners of the Northern Parcel.

We identify this as a fundamental breach of the NSIP process from the outset. The Scoping Report must refer to the investigation that was undertaken, or how else will the basic, mandatory first step be properly and fairly assessed?

The developer will realise significant additional profits from the inclusion of the Southern Parcel, given its close proximity to Creyke Beck and the new Wanlass Beck Substation. Parishioners and the Action Group strongly contend that failing to acknowledge that this first, mandatory requirement has been deliberately avoided by this developer will demonstrate that the weight of bias in the process is heavily in favour of the developer, against the reasonable and deeply felt concerns of all local residents.

As a result, we would recommend that the report be rejected.

3. The Non-Statutory Information and Consultation Process:

Throughout this Scoping Report, there is a continual reference to the great efforts made by the developer to continue engaging with local residents, over and above what is required of them, including 'Information and Consultation' events with Parish Councils and three Public Information Days.

Whilst it is true that these events have taken place, the engagement lacked detail, with many questions left unanswered and inconsistencies among personnel.

The Parish Council has, via the Chair of the Action Group, emailed Clean Air Solar seeking information on a wide variety of critical issues so that we, as complete novices, could enter into some degree of informed dialogue at the Public Information Days. Indeed, their Information Booklet asserts that this is exactly the kind of dialogue and engagement they seek. However, the lack of response shows that Clean Air Solar did not intend to provide details that would allow any kind of informed dialogue and that this would be a one-way exercise of box-ticking.

The fact that this Scoping Document was submitted either before or immediately after the last Public Information Day is testament to the fact that Clean Air Solar had this information all along and chose not to share it with key stakeholders in a cynical attempt to suppress informed dialogue and engagement.

This is supported by the initial information booklet not being sent to anyone in Beverley or Cottingham, despite Clean Air Solar knowing that these areas would be heavily and badly affected; and by arranging a Public Information meeting in Beverley even though they had not told anyone about it. No attempt was made to engage with residents in Cottingham, despite them being among the most affected groups. The timing of the three meetings was completely inadequate: weekdays from 3.00pm-7.00pm, thus eliminating those working and those with children. There were no Saturday meetings and no evening meetings. Webinars also exclude those who are not users of technology, and even this was arranged at an inconvenient time.

Whilst Clean Air Solar may view the events as a success, with approximately 500 people attending, we contend that this was largely due to the efforts of parishes and the Action Group to publicise them. Despite locals' efforts to encourage as many people as possible to attend, 0.01% is not a success.

4. Chapter 7 – Hydration:

The biggest single concern in this Scoping Report is the entire chapter, which perfectly illustrates the three broad themes highlighted above. The casual assumptions made in this chapter about what is to be included or excluded as part of this proposal are fundamentally flawed and so incorrect that, if left unchallenged, they would be seen as negligent. It demonstrates a total lack of awareness of the increased risk caused by placing a substantial solar farm on top of the East Yorkshire Chalk Aquifer above an area that is nationally designated a Critical Drainage Area. It assumes that the biggest risk is the flooding threat to the Northern Parcel as a result of its proximity to the nearby flood zone. There is NO acknowledgement of the academic and practical research which has clearly demonstrated that solar farms present a significant flood risk to adjacent land, particularly on sloping terrain. Indeed, this Scoping Report declares such a risk as insignificant and states that it will be excluded as a factor requiring further risk analysis. Indeed, it does not mention that all agricultural residences east of the railway line at Aike are on boreholes for water supply, a glaring omission. In addition, residents of Aike do not have mains sewers, but rely on cesspits for sewage removal; any change in the water table here could have significant health and safety implications.

Our argument is this:

Relevant Baseline Conditions for Scoping 7.3 Study Area (page 107/8) states:

'In the absence of any specific guidance relating to solar developments... the design manual for Roads and Bridges will be used... a 1 km buffer zone from the site boundary has been considered appropriate, as it provides sufficient distance to encompass the catchment associated with the Proposed Development and to enable the deposition of silts in overland flows and the dilution of any concentrated pollutants. Any impact on water bodies beyond 1 km from the site boundary is considered negligible.'

Table 7.2 (page 117)

'For the solar array within the North and South Parcels, a quantified surface water run-off strategy will NOT be provided. This is on the basis that, when vegetated cover is provided beneath the panels and within the spaces between rows (which will be the case for the Proposed Development), run-off from the parcels is considered to have a negligible effect compared with the baseline scenarios.'

7.8.22 Cumulative Assessment

'No assessment of slope stability, geotechnical risk or contamination will be carried out as part of this assessment. 'FLOODS ARE A NATURAL OCCURRENCE'. We strongly contest that this demonstrates a deeply flawed approach to this critically important issue and that it must be completely rejected for the following reasons:

There is a substantial body of accepted, robust evidence that clearly demonstrates that the siting and configuration of solar farms have a significant negative impact on rainwater runoff and constitute a significant, direct threat of increased flooding risk to the area directly below the Solar Farm.

Some recognition of an increased threat caused by the siting of the BESS and the new substations is included, but it is only relevant to the BESS and substations risk assessment and is specifically excluded from the solar array/configuration itself.

- A) Cook and McCuen (2013)
Solar panels are entirely impervious. When arranged in dense rows, they act as elevated catchment surfaces that interrupt uniform rainfall at the lower edge of the panel (drip line). Whilst solar panels do not change the volume of water falling on a site, they dramatically alter its distribution and create localised saturation zones. This significantly increases the kinetic flow of water draining from solar panels compared to natural rainfall. On a sloping site such as this, this accelerated run-off will detach soil particles, initiating rill and gully erosion.
- B) Wallingford Hydrosolutions (WHS 2017)
If the ground cover beneath the panels is compromised by shade or erosion, the lack of architecture reduces surface roughness, and peak discharge rates and run-off volumes increase markedly compared with pre-development, greenfield conditions. The concentrated drip-line run-off, compacted soil and gravity shorten the catchment's 'Time To Peak'. Water reaches the downstream watercourses or drainage ditches faster, compounding the hillside's peak flow with the existing vulnerability of the flood risk area below.

C) Essex Design Guide (2022)

If panels are aligned perpendicular to the site contours rather than parallel to them, run-off channels feed into high-velocity streams, increasing the risk of downstream flash flooding. They also carry high sediment loads, which silt up downstream culverts, field dams and attenuation ponds, reducing the downstream area's baseline flood resilience.

D) Planted/Low Impact Design Research (2024)

The highest risk occurs during the Construction and Immediate Post-Construction phase, when heavy machinery severely impacts the soil structure, transforming a highly absorbent greenfield state into a semi-impervious state. There is, therefore, a significant increase in the risk that intense rainfall will cause catastrophic run-off into downstream/downslope areas.

E) Rouleau at Al (2024)

Solar farms cause a localised infiltration hot-spot (+19%) and can prematurely saturate localised Chalk layers and concentrated infiltration cannot be absorbed and instantly converts in to surface run off that flows down the slope. This run off erodes the top soil and sediment heavy, turbid water flows in to the Chalk fissures and sink holes and presents a severe risk of contaminating the Groundwater with salt which can impact on downgrading water supply.

These proven risks must then be set in the context of the precise geography and topography of the Southern Parcel of land and its exact placement on the East Yorkshire Chalk Aquifer above England's second biggest flood risk area, which has been formally classified as a Critical Drainage Area.

The sloping Chalk landscape of the Yorkshire Wolds, rolling down from Skidby, Little Weighton, Bentley and Walkington towards Cottingham, Willerby, Hessle and West Hull (1-6 miles away), is a highly sensitive environmental intersection. Highly permeable Chalk flows into the low-permeability clay basins of Hull. The East Yorkshire Chalk Aquifer is highly protected by the Environmental Agency due to its Regional Importance in providing drinking water to the whole region around the Humber Estuary.

All of the risks identified above were realised in a terrifying, unforgettable, catastrophic event in this exact area in 2007. Whilst the area directly underneath the proposed solar farm has been historically vulnerable to surface flooding, the area experienced disaster in 2007. Following an intense (but increasingly uncommon) rainfall, rapid overland sheet flow was suddenly generated, which overwhelmed the drainage systems of the villages below. The result was catastrophic, with 17,000 homes badly damaged, 35,000 people displaced or disrupted - thousands living in caravans for up to 2 years whilst their properties were dried and rebuilt, 91 out of 100 schools with significant flood damage; 30,000 children had severely disrupted education; 1,300 businesses significantly affected, and many never recovered and closed down.

Whilst significant flood-prevention work has been undertaken, none of the risk assessments considered the placement of an industrial-sized 1465-acre solar farm, a BESS, and other major energy infrastructure installations directly above the flood risk zone.

The fact that the developer has specifically excluded this risk from further analysis because it is considered 'an insignificant risk', and that in any event they would have confined the possible impact to an area within 1 km of the solar farm boundary, is staggering in its complacency. It shows a complete lack of both understanding and a desire to understand. It speaks volumes about the attitude this developer has towards the genuine and real concerns of all the residents who will or could be significantly affected by this proposal.

The land adjacent to and surrounding the proposed Northern Sector is the natural flood plain not only for the River Hull but also for Barmston Drain and the extensive drainage network in the area. These drains must be maintained to facilitate run-off from higher on the Yorkshire Wolds and thus prevent flooding further upstream. In 2007, when the Wilfholme pump was not engaged early enough to take the excess from the fields between Hull Bridge and the area under consideration, this resulted in the flooding of villages including Hutton Cranswick, Watton, Beswick, Kilnwick, Lockington, Scarborough and Leconfield, as well as hamlets and homesteads throughout the area. Subsequent drainage of the area then forced the excess water into Holderness, where extensive flooding occurred.

5. Description of Site

The hamlet of Bentley, despite the proposal to completely surround it, has been omitted. This community of 17 properties and households faces the greatest burden of any community. Solar panels are shown adjacent to gardens and in close proximity to dwellings. This will destroy the identity and viability of this historic community, which appeared in the Domesday Book. Residents are already very adversely affected, with mental and physical health issues arising.

Aike in the Northern Sector, as well as properties in Watton and Wilfholme, are to be surrounded by solar panels. Once again, solar panels are shown adjacent to gardens and dwellings, including businesses and tourism ventures.

6. Buried Heritage

Small yet important areas within the Northern Sector appear to be ignored, as do the Listed buildings within and in close proximity to it. Reported Roman and other archaeological artefacts are not identified or noted in the document.

In the Southern Sector, misrepresentation of the 74-acre Heritage Site of the Risby Jacobean Gardens, Hall and Medieval settlement, which is at its heart and has the same protection by Historic England as Stonehenge, is of great concern.

7. The Planning Framework

There are confusing references to both the Planning Act (2008) and the new Planning and Infrastructure Act (2025). Given the extensive differences between their approaches, there should be no such confusion.

8. Engagement and Consultation

The Scoping Report states that 'the applicant may NOT be required to undertake a formal statutory phase of consultation'. Given public opinion and the fact that this is one of the first, if not the first, proposals following the 'fast-track' route, this must not be permitted.

9. Cable Search Area

The cable search area is far too wide (2 km in places) and shows extensive variation in options. This is a result of the two sectors being separate proposals rather than a single one as described by Clean Air Solar. A cable search just 200 m from the centre of the historic market town of Beverley must not be permitted. How can this be considered? Much of the town's development lies within 200 m of the centre (assuming this to be the Market Cross) and includes Beverley Minster, Beverley Westwood and a whole range of protected buildings.

This is completely unacceptable. It is causing immediate and significant mental anguish for residents in these wide search areas. Attendance at the other projects planned for this exact area is revealing frustration among these other major developers about the lack of clarity or a significant narrowing of the applicant's search area.

Dogger Bank D's cable route, which is planned to follow an almost identical route, should surely be considered for sharing.

10. Opportunities for Collaboration

Given the significant impact that all the competing and often conflicting projects planned for this relatively small area will have on one another, this cannot be left to the discretion of the applicant and/or PINS. It is an essential requirement that must be included from the outset. From attendance at the Dogger Bank D and SE/SW events, it is already clear that these developers are planning to use exactly the same ground for their different purposes. Opportunities to share cable routes are being ignored, with the reasoning showing no concern for the individuals affected.

11. Agricultural Land

There are a large number of inaccurate, unsubstantiated and misrepresented statements and assumptions made by the applicant. These are particularly important because the applicant concludes each claim with the phrase 'Therefore, this issue will not be investigated further and will be scoped out of the Report'.

These are vitally important objections and reveal the applicant's true intention to bypass and exclude fundamental issues that might halt or slow down this application.

Agricultural land should be used for agriculture; we are not being told that we have produced too much food, but Ed Milliband is being told that the nation is producing too much solar power!

12. Transport and Access

This report includes only 4 other projects and deliberately excludes a wide range of other approved projects that will absolutely impact the local environment. It is vital that Clean Air Solar investigate all other proposed developments before taking this further.

Access to the Northern Sector is very limited, with the four routes across the area from the A164 being low-grade, single-track roads that flood and experience movement due to the shrinking and expanding of the clay sub-soil. Widening these lanes is not possible due to drainage ditches. Crossing the main railway line from Hull to Scarborough is restricted by the narrowness of the level crossings. This is not considered an issue.

13. Health and Well-being

The applicant makes a long series of unreasonable and unjustified assumptions on a wide range of key human health and well-being issues. The very same conclusions are reached that these are 'insignificant and will not be investigated further and will be scoped out of the Report'.

Both sectors are used extensively by locals and visitors for vital recreation, with public footpaths (PROWs and Permissive), bridleways, and roads used for walking, riding, and cycling, as well as for access to fishing and boating, birdwatching and wildlife, tourist facilities, vineyards, riding stables, and Highland Cow experiences, to name just a few. Within the Northern Sector, the following PROWs are used extensively, both individually and as parts of large circular routes, to access Beverley and as far as Driffield: BESWB01, BESWB21, BESWB23, WATTB13, WATTB24, LOCKB04, LOCKB09, BESWF16, BESWF17, BESWF18, WATTF12, WATTF15, and WATTF16. The ERYC PROW map may be accessed using the following link: [ERYC - Public Rights of Way map](#). These vital resources are ignored or given lip service.

These are of critical importance and must be examined in detail. This reveals the true intentions of Clean Air Solar to sideline and avoid obtaining any true understanding of the impact on the human health and well-being of all residents who will be affected by their proposal and the users of the areas' facilities.

14. Socio-Economic

The use of agricultural land involves not only those farming the land but also those providing services to them, such as grain suppliers, mills, agricultural engineers, markets and retail establishments, food processors, etc. Beswick Parish Council, in association with the Stop Clean Air Solar Farm Action Group, has provided specific examples of inaccurate assumptions made by Clean Air Solar about this critical issue. In particular, the total dismissal of the Cumulative Impact of this proposal, on top of all the other solar farm and other energy projects, must be rejected at the outset. The wording of their statement and conclusion, which dismisses this, reveals the true intention of the applicant to try to avoid the obvious correlation.

In view of the issues outlined above, we strongly contend that this Scoping Report is unfit for purpose and should be rejected. It shows that this proposal is not a single, unified entity but two separate projects spliced together in haste, making it much harder for the diverse communities affected to speak with one voice. The issues confronting each parcel are entirely different, and we believe this is a calculated, cynical and disingenuous attempt by the developer to take advantage of the new NSIP process to fast-track an ill-conceived proposal in order to maximise profits even further by co-locating as close to Creyke Beck as possible.

They have clearly undertaken the appropriate level of preliminary investigation prior to submission and have deliberately withheld important information from Beswick PC, the Action Group and other stakeholders in pursuit of rapid advancement through this new process.

Lockington Parish Council is liaising with all local parish councils and the Action Group created to represent both the Northern and Southern Parcels, as the parishes of Beswick, Watton, Lockington and Leconfield are too small and have too few parishioners to be taken seriously. This is, of course, the reason Dalton Estate and its Land Agent have determined this to be a perfect place to maximise their income, without thought for their tenants, the biodiversity in the area, and the large number of resident and migratory rare birds.

Given that we will be among the very first proposals to negotiate this new, shortened NSIP process, there must be an extremely strong focus on how all this plays out.

We strongly believe that the voices of local residents on such a hugely important proposal must be taken into account at the earliest possible stage in this new process, and that the evidence presented is compelling that this Clean Air Solar proposal does not demonstrate the due diligence required for a proposal that will irrevocably transform our rural, heritage landscape over the next 60 years.