

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 generations of farming heritage.

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

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

Our concerns are linked 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 stand alone 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 is 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, very flat, of mainly Grade 3a soil quality with 3b closer to the natural carr land. In contrast, the Southern Parcel is high lying, undulating because of it's position on the edge of the Yorkshire Wolds, sits on the East Yorkshire Chalk Aquifer and is 99% Grade 2 and 3a soil quality.

The Northern parcel sits adjacent to a number of flood zones and is indeed part of the drainage infrastructure for the Yorkshire Wolds, whilst the Southern Parcel sits directly above a Critical Drainage Area in 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 it's centre which the Developer somehow believes will be incorporated in to the site.

These contrasting profiles will require quite separate and distinct technical solutions to every chapter heading, from Biodiversity (6) right through to Land Quality and Groundwater (18). We contest that the co-joining of these two completely separate parcels

of land in to one proposal is a cynical and perverted attempt by this developer to surreptitiously take advantage of the new planning process by 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 represents a significant bias in all stages of the forthcoming Consultation and Assessment process towards the developer at the expense of local communities who are aghast that this proposal could even be submitted, never mind considered.

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

There is a total lack of any reference as to why the two parcels of land have been identified in the first place. This omission is of critical importance as the report itself recognises the fact 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 in to all other possible sites within a determined search area has been undertaken, including Grade 3b, 4 and 5 land, brownfield sites and other suitable places such as car parks, roofs of large buildings etc all of which are readily available in and around the Humber, 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 contained 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.

The developer was directly asked by a numerous and wide range of people on all 3 Public Information Days to provide details of the search area and what 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 reason for the reduction of the 1000 acres from the Northern Parcel from 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 reason the land in the Southern Parcel was included in the proposal was to compensate for the reduced footprint of the Northern Parcel and that this could be done quickly and effectively by just

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 whole NSIP process from the very outset. The Scoping Report must include reference to the investigation that was undertaken or how else will the basic, mandatory first step be properly and fairly assessed?

The developer will make significant additional profits with the inclusion of the Southern Parcel due to its close proximity to Creyke Beck and the new Wanlass Beck Substation. Parishioners and the Action Group strongly contest that a failure 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 should 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 to engage 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 was lacking in detail with many questions left unanswered and inconsistencies between 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 in to 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 and desire. However, lack of response would show that Clean Air Solar did not intend providing 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 they Clean Air Solar had this information all along and chose not to share it with key stakeholders in a cynical attempt to repress informed dialogue and engagement.

This can be 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; then arranging Public Information meeting in Beverley even though they had not told anyone about it. No interaction was attempted with the residents in Cottingham despite them being one of the most impacted group of residents. The timing of the three meetings was completely inadequate: weekdays from 3.00pm-7.00pm, thus eliminating those working and with children. No Saturday meeting and no evening. Webinars also exclude those who are not users of technology and even this was arranged at an inconvenient time.

Whilst Clean Air Solar may see the events as a success as approximately 500 people attended. We contest that this was largely due to the efforts of parishes and the Action Group to publicise them. Despite the efforts of locals to encourage as many people as possible to attend, 0.01% is not a success.

4. Chapter 7 – Hydration:

The biggest single concern we have in this Scoping Report is this whole chapter and it perfectly illustrates the three broad themes highlighted above. The casual assumptions made in this chapter as to what is to be included or excluded as part of this proposal are fundamentally flawed, and so incorrect that, if left unchallenged, would subsequently be seen as negligent. It demonstrates a total lack of awareness of the increased risk caused by the placement of 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.

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 sufficient distance is provided to encompass catchment associated with the Proposed Development and to enable the deposition of silts in overland flows and dilution of any concentrated pollutants. Any impact to water bodies beyond 1km from the site boundary are considered to be 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 spaces between rows (which will be the case for the Proposed Development), run off from the parcels is considered to have a negligible effect when compared to the baseline scenarios.

7.8.22 Cumulative Assessment

'No assessment of slope stability, geo-technical 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 it requires to 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 has a significant, negative impact on rain water run off and constitutes a significant, direct threat of an increased risk of flooding 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 are included but are only relevant to the BESS and substations risk assessment and are 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 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 shadow or erosion, the lack of architecture reduces surface roughness and peak discharge rates and run off volumes increase severely compared to 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, stacking the peak flow of the hillside on top of 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 into high velocity streams with an increased risk of downstream flash flooding but also carries high sediment loads which silt up the downstream culvert, field dams and attenuation ponds reducing the downstream area's baseline flood resilience.
- D) Planted/Low Impact Design Research (2024)
The highest risk is during the Construction and Immediate Post Construction phase whereby heavy machinery has severely impacted the soil structure and transforms 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 AI (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 put in to 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 sloped, chalk landscape of the Yorkshire Wolds rolling down from Skidby, Little Weighton, Bentley and Walkington towards Cottingham, Willerby, Hessle and West Hull (between 1-6 miles away) is a highly sensitive environmental intersection. Highly permeable Chalk flows in to the low permeability of the clay basins of Hull. The East Yorkshire Chalk Aquifer is highly protected by the Environmental Agency due to it's Regional Importance in providing drinking water to the whole region around the Humber Estuary.

All of the risks identified above were experienced in a terrifying and not to be forgotten, 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, a 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/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 included the provision of an industrialised sized 1465 acre solar farm plus a BESS and other major energy infrastructure installations being placed right 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 in any event they would have confined the possible impact to only an area within 1 km of the solar farm boundary, is staggering in it's complacency. It shows a complete lack of both an understanding and a desire to understand. It speaks volumes of the attitude this developer has for 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 to Barmston Drain and the extensive drainage network in the area. These drains must be maintained in order to facilitate the run-off from higher on the Yorkshire Wolds and thus preventing flooding further up-stream. In 2007 when the Wilfholme pump was not engaged early enough to take the excess from the fields between Hull Bridge and the area being considered, 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 in to 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 negatively affected with mental and physical health issues being invoked.

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 are the Listed buildings within and in close proximity to it. Reported Roman and other archaeological artefacts are not identified or noted within 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 the heart of it 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 the approaches of them, 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 the public opinion and that this is one of the first, if not the first proposal following the 'fast-track' route, this must not be permitted.

9. Cable Search Area

The cable search area is far too wide (2km in places) with extensive variation in options. This is a result of the two sectors being separate proposals and not a single one as described by Clean Air Solar. A cable search just 200m from the centre of the historic market Town of Beverley must not be permitted. How can this be considered? Much of the development of the town is within 200m 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 this is causing immediate and significant mental anguish to residents in these wide search areas. Attendance at the other projects planned for this exact area is revealing frustration from 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 of all of the competing and often conflicting projects planned for this relatively small area will have on each other, 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 explicitly clear that these developers are planning to use exactly the same ground for their own different purposes. Opportunities to share cable routes are being ignored with 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 incredibly important as the applicant finishes each claim off 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 true intention of the applicant 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 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 only includes 4 other projects and deliberately excludes a wide range of other approved projects which will absolutely impact on the local environment. It is vital that Clean Air Solar investigate all other proposed developments prior to 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 which flood and experience movement due to the shrinking and expanding of the clay sub-soil. Widening of 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 as 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. There are the very same conclusions made that these are 'insignificant and will not be investigated further and will be scoped out of the Report'.

Both sectors are used extensively by both locals and visitors to the area for vital recreation with public footpaths (PROW and Permissive), bridleways and roads used for walking, riding, cycling, access to fishing and boating, bird watching 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 as well as to access Beverley and as far as Driffild: 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 side line and avoid obtaining any true understanding of the impact on the human health and well-being of all residents who will be impacted by their proposal and the users of the areas' facilities.

14. Socio-Economic

The agricultural land usage involves not only those farming the land but those providing services to them; 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 dismissing this reveals the true intention of the applicant to try and avoid the obvious correlation.

In view of all of the issues presented above, we strongly contest that this whole Scoping Report is unfit for purpose and that it should be rejected. It demonstrates how this proposal is not a unified, single entity but two separate projects spliced together in haste to make it so much harder for the diverse communities affected to speak with one voice. The issues confronting each parcel are completely different and we believe that this is 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 more by co-locating as close to Creyke Beck as possible.

They clearly have undertaken the right 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 a rapid advancement through this new process.

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

Given that we will be one of the very first proposals to negotiate its way through 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 in to account at the earliest possible stage in this new process, that the evidence presented is compelling evidence that this Clean Air Solar proposal does not demonstrate the due diligence required for a proposal which will irrevocably transform our rural, heritage landscape over the next 60 years.