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27 July 2026

Planning Inspectorate  
Environmental Services  
Infrastructure Decisions and  
Applications Service  
Planning Inspectorate  
c/o QUADIENT  
69 Buckingham Avenue  
Slough  
SL1 4PN

Dear Sir/Madam

**Planning Act 2008 (as amended) and The Infrastructure Planning  
(Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) –  
Regulations 10 and 11**

**Proposed application by Clean Air Renewables Limited (the applicant) for an  
Order granting Development Consent for the Clean Air Solar Farm (the  
proposed development)**

Thank you for the opportunity to make comments on the environmental  
Scoping proposal for the Clean Air Solar Farm

Skidby Parish Council has reviewed this document specifically in relation to  
the potential impact of the proposal on Skidby Parish. It is aware that there will  
be wider impacts and concerns across the project area but has focussed on  
issues that will impact on Skidby residents and businesses.

Comments are made on the content of each chapter. We recognise there will  
be some cross over between chapters but want to ensure that all our  
concerns are recorded and addressed.

A number of general comments about the report have also been identified:

#### **General Comments**

- Although in some chapters the southern parcel is identified separately – there are several chapters where they are treated as one eg agricultural soils. This fails to recognise the distinct characteristics of the two areas and underplays or misrepresents issues unique to each. It is clear that this project has been artificially constructed to generate the coverage necessary to generate 500 megawatts of electricity but in reality, the two areas have little in common. It is essential that the two parcels of land are assessed separately to provide a realistic and accurate outcome.

- The report makes passing reference to other projects in the area with a view to combining effort but no real assessment in proposed of the cumulative impact of approved and proposed projects in the immediate neighbourhood. Impacts that are minor from one proposal may become much more significant when multiplied by the impacts of other proposed developments.
- There is no recognition of the particular effects of the proposal on the village of Bentley which will be completely surrounded
- The document does not pay sufficient attention to potential impacts on the chalk aquifer which supplies drinking water to the region
- The report does not consider the potential impact on minority communities eg 2 traveller sites in Skidby parish, one within 1 mile of the project area.
- The document makes no reference to academic reports on the impact of solar farms and relies entirely on reports from government official interest groups. Consideration of the findings of academics and other researchers would give the document more weight and credibility.
- The proposed studies and surveys are often desk based – more account should be given to site visits and liaison with local residents to gain local knowledge which may be able to refine the assumptions and high level results to reflect lived experience of local residents and identify specific issues and local nuances not identified by the proposed work.

## **Specific Comments**

### **Chapter 6 – Biodiversity**

The Biodiversity chapter is thorough and covers most issues of relevance to Skidby. However, there is anecdotal evidence of adders in the area that doesn't appear to be reflected in the proposed surveys. These should be added.

### **Chapter 7 – Hydrology**

#### **Flood Risk and Surface Water**

Residents of Skidby have experienced surface water flooding during periods of heavy rainfall, most notably in 2007 when houses were flooded in low lying areas in the east of the village including Riplingham Road, Orchard Road and Main Street, with further flooding in 2024 and 2025 affecting garages and outhouses. The Environmental Statement should therefore assess not only flood risk within the application site but also whether the proposed development could increase flood risk to surrounding communities, including Skidby given its location in the valley below the proposed southern site. 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 into the low permeability of the clay basins of Hull.

The assessment should therefore include consideration of:

- changes to surface water runoff from solar arrays, access tracks, substations and associated infrastructure, particularly where rainfall volume is such that it cannot soak into the ground, in light of existing issues of field runoff into Skidby;
- potential for run-off to be accelerated by rill and gully erosion and the impact of saturation zones at the drip line.
- alterations to existing agricultural drainage systems and field drains;
- impacts on local ditches, watercourses and ordinary watercourses draining towards Skidby;
- the cumulative effects of the development alongside other infrastructure projects in the area;
- future climate change scenarios, including more frequent extreme rainfall events – significant investment in flood alleviation in the surrounding areas will not have been designed to accommodate increased run-off from solar arrays.;
- evidence that there will be no increase in flood risk elsewhere, consistent with national planning policy
- Sewer capacity in adjacent settlements eg Skidby where capacity is already limited and sewers and surface waters drains are unable to cope in heavy rainfall events

In addition, site specific hydraulic flood modelling should also be undertaken for the southern parcel as well as the Northern parcel. It should be noted that Creyke Beck links into the COPFAS flood mitigation scheme and impacts on flow in the Beck may therefore be significant.

The following research reports are relevant and should be considered 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.

- a) Cook and McCuen (2013) Journal of Hydraulic Engineering
- b) Wallingford Hydrosolutions (WHS 2017) UK Hydrology Review
- c) Essex Design Guide (2022) Leader Local Flood Authority (LLFA) Guidance
- d) Planted/Low Impact Design Research Design Paper ,Kansas Geological Survey (2024)
- e) Rouleau at Al (2024) Journal of Hydrology
- f) Baiamonte /Gristina Hydrological Processes Vol 37 (17 Dec,2023)

## Chapter 8 – Agricultural Soils

Key omissions include:

- **Food security:** The southern parcel comprises almost entirely Grade 2 and 3a land (Best and Most Versatile). The report does not explain how the proposal aligns with national food security policy.

- **Site selection:** No evidence is provided of alternative, less productive sites considered or reasons for rejection.
- **Impact on surrounding agriculture:** Effects on neighbouring farms, cropping patterns, drainage and local food markets are not assessed.
- **Soil protection:** Construction and decommissioning pose risks of compaction and rutting. A soil specialist should be present on site during these phases.
- **Grassland management:** The long-term management of permanent grass sward across all phases requires clarification.
- **Parcel differences:** The northern and southern parcels differ substantially in soil type and topography. Separate assessments are essential. Combining the two areas also significantly downplays and misrepresents the amount of Grade 2 land being taken out of production in the southern parcel (minimum of 52% of the site area)
- **Climate change and heat island effects:** The report does not consider long-term climate change, panel-generated heat, impacts on crop viability, pest/disease. The report states that ‘consideration will be paid (sic) to the opportunity to introduce environmental measures that will help to avoid or reduce the potential for an adverse significant effect to occur. This statement is vague and unclear. The report needs to clarify what actions will be taken

## **Chapters 9 & 10 – Archaeology and Built Heritage**

### **Cumulative Impact on “Wold-Edge” Village Identity**

While the report identifies specific assets near each village, it does not explicitly address the **collective heritage character** of the area as a distinct “Wold-edge” landscape.

- The southern land parcel lies at the southern edge of the **Yorkshire Wolds**. The Proposed Development risks eroding the historical and visual separation between Skidby, Walkington, and Little Weighton, potentially merging their distinct historic settings into a single “industrialised” energy landscape.
- Impacts on significant heritage assets needs to be properly assessed and clear and convincing justification provided for any adverse impacts.

### **Lack of Data on Locally Listed Heritage Assets**

The report acknowledges that a publicly accessible list of **locally listed buildings** within the East Riding of Yorkshire is not currently available.

- As a Parish Council, there are other landmarks that our community values but which do not appear on national registers. The report notes that these “non-designated heritage assets” are relevant, and our

Parish Council is best placed to identify them before the baseline is finalised.

- Local communities should have the opportunity to comment on the Zone of Theoretical Visibility which need to take account of potential seasonal variation eg tree cover
- The impact on non-Listed heritage assets and Grade II Listed buildings outside 1km are ‘unlikely to be affected’. Until an assessment can be made with more certainty, they should be scoped in.

### **Impact on “Intangible” Heritage and Sense of Place**

The Scoping Report defines archaeology and heritage primarily by physical remains and settings.

- We would like the inclusion of **intangible heritage**, such as the historic “sense of place” that contributes to our community mental health and identity. The report mentions “Community identity, culture, resilience and influence” as a health determinant. We would therefore argue that the loss of a historic agricultural landscape historically associated with these villages has a social heritage impact that goes beyond simple visual screening.

### **Vulnerability of Historic Structures to Ground Vibration**

The report notes that decommissioning and construction will involve heavy vehicle movements and potentially piling.

- Many older buildings in Skidby, Walkington, and Little Weighton may have shallow foundations or be constructed from traditional materials sensitive to **ground-borne vibration**. We would like to request a more detailed assessment of how vibration from heavy construction traffic might affect the structural integrity of Grade II listed buildings along the transport routes, rather than just their “setting.”

### **Heritage Interpretation and Public Benefit**

The report focuses on the “preservation in situ” or “recording” of archaeological finds.

- If significant archaeological remains are identified—such as the Iron Age/Roman enclosures and barrows already noted near our villages—we, the Parish Council want to advocate for **public interpretation** as a legacy benefit. This could include educational signage along the proposed permissive paths or the funding of local museum displays to ensure the “heritage value” is better revealed to the residents, as encouraged by NPS EN-1.

### **Disruption of Historic Connectivity and Pilgrimage Routes**

The report mentions promoted recreational routes like the **Minster Way** and **Beverley 20**.

- These are not just modern footpaths but often follow ancient tracks and pilgrimage routes to **Beverley Minster**. We believe that the development impacts the *historical experience* of moving through the landscape, which is a facet of “Built Heritage” value that is not fully captured by looking at static views of individual church towers.

### **Geoarchaeological Potential and Ancient Landscape Management**

The report mentions the potential for geoarchaeological deposits like pollen and waterlogged seeds in alluvial areas.

- Given the proximity to the **River Hull headwaters** and various becks, we would like a more rigorous study of how the solar farm’s drainage strategy might change the groundwater levels. Changes in hydrology can cause the **desiccation and destruction of organic archaeological remains** that may have survived for centuries in waterlogged conditions near these villages.

### **Chapter 11 – Landscape and Visual**

Whilst the scoping report appropriately scopes out recreational activities where it is noted appreciation of the landscape is not a principal component (e.g. fishing at Risby Park Ponds), the extensive network of Public Rights of Way around Skidby is fundamentally different. Walkers, cyclists and equestrians use these routes specifically to experience the open countryside, views and tranquillity of the Yorkshire Wolds foothills. These receptors are likely to be of high sensitivity under GLVIA3 and should therefore be fully assessed within both the Landscape and Visual Impact Assessment and the Human Health assessment.

Assessment should also consider the sequential experience of travelling through the landscape, changes to openness, tranquillity and rural character and cumulative impacts across the networks of rights of way

**Impact on wider receptor groups** The landscape in the Southern Parcel forms one of the closest areas of open countryside and green belt area to densely populated nearby urban areas. As such its value extends far beyond the immediate local population. The assessment should therefore recognise that any change to the landscape and visual amenity affects a much wider population, who with regularity utilise this area for recreation. Assessment should include bodies that specifically represent such groups.

**Walking routes relevance** The Public Rights of Way within the Southern parcel form a network of well used linear and circular walking routes ranging from 2 miles to incrementally longer routes, leading to the Wolds Way. These routes are extremely popular as they provide multi distance safe, traffic free access through open countryside allowing minimal use of motorised transport, thus reducing risk to the public and horse riders alike. The environmental impact assessment should assess the effect of the proposed development on experience of those using such routes rather than considering individual sections of footpaths in isolation.

**Impact on Equestrian users** The Landscape and visual impact assessment should also specifically assess the impacts on equestrian users of the public rights of way and bridleways. Horses and their riders are highly sensitive

visual receptors as they experience the landscape in a novel manner, and are particularly affected by changes to openness, fencing, security infrastructure glint and glare. Professional judgement for assessment of these factors should include specific equestrian bodies such as The British Horse Society . who should be consulted regarding potential impacts on equestrian users, including the effect of deer fencing, security infrastructure, construction traffic and changes to the character and safety of bridleways and other routes used by horse riders. It is noted in Skidby alone there are 8 equestrian establishments that maximise the unique mix of quiet roads linked to the Southern parcel public rights of way Where the assessment of the sensitivity of landscape and visual receptors relies on professional judgement, the Environmental Statement should clearly explain the evidence and reasoning that underpins that judgement. Conclusions should be transparent, reproducible and consistent with GLVIA3, enabling consultees to understand how significance has been determined.

## **Chapter 12 - Transport and Access**

There should be a traffic plan in place for each type of traffic -  
Workforce/HGVs/Plant and Machinery/Delivery of infrastructure and Soil and Stone

There should also be separate reports and surveys done for each section separately due to the difference in highway infrastructure and use in both the northern and southern sites these should be done at regular intervals to take into account seasonal changes

There has been no indication where the BESS or converter stations are likely to be placed making it difficult to make any plan for traffic

The following issues need to be reflected in the environmental assessment:

How will the traffic from this scheme interact with other traffic generated by all the other current and proposed major infrastructure schemes?

How will the excess traffic affect the newly opened Hull to Beverley and Hull to Cottingham cycle tracks?

Traffic management surveys should be done at very regular intervals during all phases and at both sites?

How much additional traffic is expected to be generated and how has this figure been reached?

What measures will be taken to ensure that local villages and quiet lanes are not used as cut throughs for construction or operational related traffic?

What impact is the excess traffic likely to have on the local economy?

12.2 says that there will be no hazardous loads and have scoped it out but the

BESS are hazardous as they are full of toxic chemicals and prone to igniting

We have 2 Hospitals very close to the southern section - Castle Hill and

Beverley both of these handle many emergency cases there are also many residential homes caring for old and infirm people who often need emergency care this needs to be taken into account during the traffic planning

As the whole area would be a significant provider of the nation's power would it then become a terrorist target, if so what impact on the road network would be impacted by security considerations.

## **Chapter 13 - Carbon and Climate Change**

Whilst it is accepted that the aim of the project is to reach net zero and reduce climate impact, this needs to be offset by negative impacts such as the loss of agricultural land, the detrimental impact on landscape and heritage and the negative impact on residents' quality of life. These are not adequately addressed in the assessment.

Paragraph 13.12.6 states that the baseline current and future climate conditions remain unchanged, regardless of whether the Proposed Development is built, this seems counter to the aim of the project.

Paragraph 13-9-11 refers to the Whitby (weather?) Station – is this relevant for inland areas in the southern parcel?

Section 13-10 needs to take account of flood risk beyond the site boundaries. It is not clear that the assumptions in section 13.4 have taken proper account of increasing demand.

Paragraph 13-12-13 states 'the assessment considers the impact of climate change on the Proposed Development (as opposed to the impact of the Proposed Development on climate change), and therefore an inter-project cumulative assessment is not applicable.' Both should be covered.

## **Chapter 14 - Noise and Vibration**

Construction traffic and noise should be factored in until appropriate routes are identified and mitigating actions are in place. Access is likely to be from small rural lanes with limited traffic currently.

A plan should be developed to minimise impact on local residents including restrictions on delivery routes and access times both during construction and operation.

## **Chapter 15 - Human Health**

It is noted consultation is yet to be undertaken to date for human health (sec 15.7.1) It is requested that the scoping document uses specific local evidence of health for baseline evaluation not only district wide statistics which may not represent sensitive residential receptors.

**Non-resident identification** The assessment should also explain how non-resident recreational users have been identified and quantified, Visitor users of the public rights of way should be considered as part of the health assessment as these routes make an important contribution to preventative health through regular outdoor exercise and access to nature

**Gypsy/Traveller sensitivity of residential receptor** The Human Health Scoping Document refers to potentially vulnerable groups but does not appear to identify the established Gypsy / traveller sites near to the Southern parcel and within the Parish of Skidby. The assessment should include the residents of the nearby traveller site as a distinct receptor group. Romany gypsies and Irish Travellers are recognised ethnic groups under the Equality Act 2010 and any disproportionate impacts on these communities should be fully assessed There are two, permanent sites Woodhill Way (HU15 5SX) approximately 50-80 residents and within 1.5 Km of the site boundary Westfield Rd (HU16 5YJ0). 40-60 residents Given the proximity to the proposed development the environmental statement should confirm whether this has been included as a sensitive residential receptor and assess any potential health, amenity, and equality impacts including noise, dust traffic and mental wellbeing.

**Tenant farmers, Agricultural workers, Farming families** The human health scoping report includes unemployment and income as determinants of health but does not appear to consider the potential specific mental health and financial wellbeing impact on tenant farmers, agricultural workers and farming families whose livelihood and security of tenure may be affected by the proposal. The environmental statement should assess whether this group represents a sensitive receptor and evaluate any likely significant effects together with appropriate mitigation where necessary.

**Changes to the landscape character** The report focuses largely on whether people can still access the countryside for health and wellbeing but not whether this access will continue to offer the same benefits once its character has fundamentally changed. Changes that discourage this activity may have long term consequences for physical and mental health wellbeing on the receptor group.

### **Chapter 16 - Socio-Economics**

Skidby is a small, historic rural village characterized by its agricultural heritage and its famous working landmark, the Skidby Windmill. The proposed development introduces distinct socioeconomic shifts:

**Industrialization of the Rural Economy:** The proposal would fundamentally shift Skidby's economy away from active agriculture. The vast scale of the solar arrays (covering thousands of acres of local land) would transition the area from a farming village to an industrial energy park.

**Loss of Productive Agricultural Land:** The project directly impacts local farming livelihoods by removing Grade 2 and Grade 3a agricultural land from food production. In planning terms, this is classified as Best and Most Versatile (BMV) agricultural land, which is crucial for regional and national food security.

**Aesthetic and Tourism Depreciation:** Skidby relies heavily on its historic rural landscape to attract visitors (such as walkers, cyclists, and heritage tourists visiting the Yorkshire Wolds). The introduction of security fencing, PIR lighting, CCTV, substations, and battery units will industrialize a pristine rural landscape, permanently degrading the visual amenity enjoyed by residents and visitors to local heritage assets like the Skidby Windmill.

**Temporary Construction Disruption:** The 2-to-3-year construction phase will bring heavy goods vehicle (HGV) traffic, noise, and dust to rural lanes near Skidby, disrupting local travel, school commuting, and daily life.

### Critical Gaps: What is "Missing" from the Scoping Documents

**Failure to Address Cumulative Regional Impact:** This is the single biggest omission. The scoping documents evaluate the Clean Air Solar Farm in isolation. However, Skidby and the wider Beverley area are being targeted by multiple mega-projects simultaneously, including the nearby Pear Tree Hill

Solar Farm (320MW) and major grid connection upgrades (such as the North Humber to High Marnham transmission lines). The scoping report fails to address the cumulative "swamping" of a single rural pocket with national energy infrastructure.

**Underestimating the Loss of Local Farm Jobs:** While scoping reports highlight "green job creation", these temporary construction jobs are rarely filled by local villagers. Conversely, the long-term, permanent displacement of agricultural workers, tenant farmers, and supply-chain businesses supporting East Yorkshire food production is largely glossed over.

**Unclear Siting of High-Risk Infrastructure (BESS):** The exact footprint and location of the Battery Energy Storage System (BESS) site is vague. The safety, noise, and visual impacts of massive battery installations are highly localized issues that Skidby residents need explicitly detailed.

**Vague Decommissioning Plan:** With a proposed operational lifespan of 60 years, the "temporary" nature of the development is a misnomer—60 years represents multiple generations. The long-term plan for land remediation, soil restoration, and the removal of deep underground cabling is unclear.

## **Chapter 17 – Air Quality**

This is scoped out of the environmental assessment. However, it is the view of Skidby parish Council that the following matters should be included in the environmental assessment:

- Effect of dust during the construction phase, particularly in dry or drought conditions
- Impact of road traffic emissions – a precautionary approach is required as the exact traffic generation is currently unknown but the construction traffic will generate an increased vehicle flow on rural roads and farm tracks
- Impact of construction and operation on SSSIs
- Proper assessment of any emissions or pollution caused by a fire at the BESS site

## **Chapter 18 – Land Quality and Groundwater**

Some aspects are covered by the comments on the hydrology chapter and are not repeated here.

However, effects of contamination on groundwater and surface water should be scoped in. Given that contamination within soils and controlled waters can be mobile and highly variable – this issue needs thorough and wide ranging assessment

No evidence is provided of the justification for the 250m buffer zone and the 1km impact limit – these may not be adequate in all parts of the project site, depending on hydrology, geology and soils.

The current scope does not appear to take account of the potential impact of climate change or recent weather events and focusses on historical data. An assessment of worst-case future scenarios is needed.

Given the importance of the chalk aquifer underlying the site to the drinking water of the whole region, it cannot be acceptable that potential impact on it are scoped out. It is of critical importance that this issue is properly assessed and any impacts and mitigating action identified and agreed.

Scoping out of land quality and groundwater needs to be justified by clear cross reference to other chapters to provide reassurance that the relevant issues are being properly addressed elsewhere.

The chapter should also cover the impact of proposals on Special Protection Zones and include assessment of the likely impact of a fire at the BESS site on contamination of the drinking water supply.

## **Chapter 19 – Scoped out Aspects**

**Glint and Glare** – it is unclear why this is being proposed as a stand-alone report. A proper assessment is required of the potential impact on nearby communities, fauna and birds, as well as possible impact on important views and sight lines which should be protected.

**Major Accidents and Disasters** – Proper consideration needs to be given to the risks of major accidents and measures to deal with them. There is a clear threat to the water supply from contamination arising from a fire at the BESS. In addition, the infrastructure and BESS units are likely to become a possible target for bad actors and clear emergency response plans need to be developed and tested.

Recent wildfires exacerbated by drought conditions and strong winds have highlighted concerns about how such a fire would be managed on a Solar Farm traditional methods of extinguishing fires would be difficult or ineffective in managing spread. The environmental assessment should address this issue and also the potential effects of fire, smoke and emergency response on equine, livestock and other mammal receptors/

**Heat and Radiation** – the environmental assessment does not appear to include any provision for assessing the risk and potential impact of creating a heat island, on local micro-climates, adjacent crops or local communities. This needs to be scoped into the assessment.

## Conclusion

Skidby Parish Council requests that all issues raised in this submission are fully incorporated into the Environmental Statement. The scale, location and cumulative context of the proposal mean that a rigorous, locally informed and evidence-based assessment is essential to ensure that impacts on Skidby Parish and its communities are properly understood and mitigated.

Yours sincerely



Mrs J Price  
Clerk to the Council