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Branch Chair
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Authority: North Yorkshire Council (Selby)

Type of consultation: Planning Application

Full details of application/consultation ZG2025/0100/EIA - Construction and operation of a solar farm comprising up to 49.9MW (AC) and associated infrastructure

At land at: Land East Of Leys Lane, Knottingley,

Type of response: Objection

Date of Submission: 18th August 2025

All responses or queries relating to this submission should be directed to the Secretary for the Trustees at the contact details shown above on this frontispiece.

All CPRE North and East Yorkshire comments are prepared by the charity using professional planners whose research and recommendations form the basis of this response in line with national CPRE policies.

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Comment

CPRE North and East Yorkshire ('CPRENEY') welcomes the opportunity to comment on this application for the Construction and operation of a solar farm comprising up to 49.9MW (AC) and associated infrastructure. The site is located at land east of Leys Lane, Knottingley and was submitted to North Yorkshire Council ('The Council') on behalf of the Farm Energy Company ('the applicants'). The application has been submitted with a supporting Environmental Impact Assessment ('EIA').

The site extends to 41.8Ha and would seek to generate up to 49.9MW of low carbon electricity for a 40 year period. The applicants primary aim is to work with existing businesses with large power requirements to provide the power directly from wind and solar farms. A 'private wire solar farm' requires the applicant to install an underground cable from the solar farm directly to Ardagh's Knottingley factory to provide them with the renewable energy generated over a long term agreement between the applicants and Ardagh Glass Packaging for the lifespan of the solar farm. The factory is based within Wakefield Council's jurisdiction.

The site comprises a mix of land uses including agricultural and disused quarry land and is generally greenfield in nature. The site partially comprises a disused limestone quarry which has been landfilled and has accepted a range of industrial, commercial and domestic waste, as well as quarry wastes. The proposal will be located within areas that have been restored as well as areas that haven't previously been quarried.

The Site also comprises a number of agricultural fields generally delineated by low hedgerows, although there are existing areas of mature woodland which offer screening. The topography of the site is generally flat although the areas identified as potentially suitable for solar development sit within a general 'bowl feature' which is afforded more screening. Two existing turbines are also located within the Site.

The applicant has proposed a site which comprises of four parcels of agricultural land. To the north are three parcels which essentially wrap around the existing operations of Darrington Quarry. Parcel one is located on the junction of Leys Lane and Stubbs Lane. This comprises an area of approximately 11.5ha and is broadly rectangular in shape. It is delineated along its north and west boundaries by hedgerows, although around the corner with Leys Lane and Stubbs Lane the hedgerow has been generally removed. An area of mature woodland is located to the east where this parcel meets land parcel two.

Parcel two is a large, irregularly shaped area comprising 15.2ha. The Site has a small section fronting on to Leys Lane, which is bound by existing hedgerow. To the east is the operational area of Darrington Quarry. To the south of the quarry is a thick, triangular shaped area of mature woodland. The southern boundary comprises existing hedgerows and a number of trees, which will be retained.

Parcel three is broadly rectangular and shape and measures approximately 5.5ha. This parcel of land is sits within a clearing surrounded by existing mature woodland on most sides. To the north is the quarry, although this is set back by approximately 60m due to the presence of existing woodland.

Parcel four sits to the south east of parcels one, two and three. It comprises an 'L-shaped' piece of land of approximately 8.6ha in area. Along the eastern boundary is an existing mature hedgerow adjacent to a Public Bridleway (ref: 35.60/3/1) that runs along the boundary through site 4 and adjacent to site 5.

Access is via an existing private access off the existing highway network. To the east there is a railway track running north west - south east direction about 900m to the east. Access to the Site can be gained via the existing road network which is in close proximity. Access to the Site is currently possible Stubbs Lane and

Leys Lane with access to the wider transport network of the A1, A1(M) and M62. Access tracks would be constructed within the Site boundary which would provide access to the solar arrays and associated infrastructure for construction and maintenance purposes. It is envisaged that the access tracks would be constructed with stone aggregate and would be present throughout the operational phase of the Proposal.

Darrington Golf course sits to the west of the site.

The settlements of Knottingley, Darrington and Pontefract are separated from the site and the M62 and A1 transport corridors by agricultural fields.

To the south are a number of scattered farmsteads with expanses of agricultural fields and blocks of woodland. Dovecote Park Ltd is also located to the south of the Site.

The proposal would comprise the installation of solar photovoltaic (PV) modules, fixed to a mounting structure to form arrays. It is anticipated that the arrays would be orientated towards the south, running in an east to west direction across the Application Site. Approximately 82,000 panels will be installed on the site and associated infrastructure, including; Inverter/ Transformer units; Containerised battery storage; Access tracks; Onsite cabling; Fencing and security measures; and a substation.

At the end of the 40-year life-span, the equipment would be removed and the site returned to its original state – to agricultural land.

The site is not located in a national landscape designation, however, is included within the West Yorkshire Green Belt.

There are five non-statutory designated sites are within 2km of the site. These include 'Sites of Importance for Nature Conservation' ('SINCs') in the North Yorkshire local plan, and 'Local Wildlife Sites' ('LWS') and 'local Geological Sites' ('LGS') in West Yorkshire's local plan,. - The most significant being Wake Wood SINC, Mill Wood SINC – both areas of ancient woodland that borders the site. Womersley and Cridling Stubbs Quarry SINC is 250m from the site.

The site is located in flood risk 1 with a low probability of flooding.

CPRENEY objects to the proposals on the following grounds:

- The loss of BMV land;
- The loss of openness and impact on permanence in relation to the Green Belt;
- Detrimental impact on the Locally Important Landscape Area;
- Detrimental impact on users of the PROW network including the potential for detrimental impact on equestrian activities and to horses as a result of construction and operational processes; and
- The proposals are contrary to local and national planning policy.

Planning Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application should be determined in accordance with the development plan unless material planning considerations indicate otherwise. The planning system should contribute to achieving sustainable development. The National

Planning Policy Framework ('NPPF') (2024) aims to deliver sustainable development through the implementation of its policies. Paragraph 11 states that for decision making this means:

c) '*approving development proposals that accord with an up-to-date development plan without delay; or*

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

I. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

II. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to the policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.'

The Development Plan relevant to this application consists of:

- The Selby District Core Strategy (2013) ('CS'); and
- The Selby District Local Plan (2005) ('LP').

The Council has recently decided to halt preparation of a new Selby Local Plan and to continue work towards a new Local Plan for the whole of North Yorkshire. As such the existing Selby Local Plan documents remain in force until such time that the new Local Plan is adopted.

For clarity, CPRENEY do not object to the generation of renewable energy by solar arrays and consider that the generation and supply of low carbon energy will be core to achieving the UK goal of net zero carbon emissions by 2050 or earlier. This will require a transformation of our energy system over the next 20–30 years. The scale and immediacy of the threat to the climate and our countryside means that change is necessary.

The current model of renewable energy development has resulted in some poor outcomes for landscapes, the environment, and rural communities. CPRENEY wants to change this and believes it is possible to achieve the net-zero transition, including the introduction of new solar developments, in harmony with our wider environmental and social objectives.

This means taking a strategic planning approach to development of renewable energy assets at the local level and ensuring that local communities are empowered to help shape their local energy response. CPRENEY will, therefore, only support solar developments which:

- minimise impacts on landscapes, tranquility and heritage, through appropriately scaled development;
- minimise the impacts on the Best and Most Versatile agricultural land;
- bring net benefits to biodiversity;
- benefit the rural economy; and
- are supported or owned by local communities.

Furthermore, CPRENEY consider that renewable energy generation and climate change mitigation must be maximised within urban areas, including the retrofitting of existing stock, on land and rooftops of industrial and commercial estates and priority given to using previously developed land in line with CPREs 'brownfield first' policy. All new buildings (of any type) should have solar and / or other appropriate energy generation and efficiency measures incorporated into their design and build as standard.

The proposal subject to this application is for circa 41.8Ha in total of greenfield land currently in agricultural use or has been restored from a previous use as a quarry and subsequent landfill, therefore, is not in line with the 'brownfield first' policy. According to the applicants detailed assessment, the site contains 11.8 ha of best and most versatile quality agricultural land (1.5 ha of Grade 2 and 10.3 ha of Subgrade 3a) along with 29.7 ha of lower quality land (Subgrade 3b). As such, CPRENEY consider that 11.8Ha of the land itself should not be being considered for this type of development.

The NPPF clearly directs Local Planning Authorities making decisions about the natural and local environment to:

- protect and enhance landscapes, biodiversity, geology and soils
- recognise soils as a natural capital asset that provide important ecosystem services
- consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land
- prevent soil, air, water, or noise pollution, or land instability from new and existing development

This concept is replicated in the Council's CS Policy SP18 which seeks to protect and enhance the environment by '*steering development to areas of least environmental and agricultural quality*'. Further, 'A Green Future: Our 25 Year Plan to Improve the Environment' sets out the government's 25-year plan to improve the health of the environment by using natural resources more sustainably and efficiently. It plans to: protect the best agricultural land; put a value on soils as part of our natural capital; and manage soils in a sustainable way by 2030 amongst other things. As such, BMV of Grade 3a and above is highly regarded and should be protected from development.

As a private wire scheme, CPRENEY understand that the development has been proposed with a specific aim of allowing the Ardagh Glass Packaging site to generate its own power and as such this weighs in favour of the proposed development.

That being said, CPRENEY consider that the Knottingley site is substantial with plenty of suitable rooftop space that could be used for the retrofitting of solar panels. Furthermore, the large carpark to the north of the buildings could also be developed to provide solar canopies used to power the plant and provide shelter and shade to vehicles underneath. This option does not appear to have been discussed in the applicants submitted documents. Unfortunately the proposal remains contrary to planning policy in its current guise.

Paragraph 153 of the NPPF sets out that "*inappropriate development is by definition, harmful to the Green Belt and should not be approved except in very special circumstances*." The NPPF goes on to state that "*substantial weight is given to any harm to the Green Belt*" and that the Government places great importance on Green Belts. The fundamental aim of Green Belt is to prevent urban sprawl by keeping land permanently open. By virtue of its nature, the proposed solar farm development represents "*inappropriate development in the Green Belt"* and so the applicant will need to demonstrate very special circumstances for the project to proceed (paragraph 160 of the NPPF). CPRENEY considers that the proposed

development would have a significantly negative impact on the Green Belt. Furthermore, the proposed development will introduce the appearance of continuous glass and metal which is clearly not what is expected in a typical countryside location. This impact is exacerbated by the fact that the solar farm would be visible from a number of locations. Therefore, the substantial solar farm would cause inherent harm to the openness by reason of its inappropriateness itself.

A recent appeal decision (APP/A1910/W/23/3317818) set out that while the renewable and climate change benefits of the proposed development carried significant weight the harm to the Green Belt caused by the landscape issues would not be clearly outweighed by other considerations to justify special circumstances exist, thus the climate benefits are not always a trump card. Furthermore and importantly, the Inspector set out his opinion that whilst 'reversible' 40 years cannot be considered temporary *"I do not find this argument to be persuasive in terms of reducing the effect on Green Belt openness. Although the proposal is for a limited period, the length of that period is very substantial. But even more importantly, the fundamental aim of national Green Belt policy is to prevent urban sprawl by keeping land permanently open. With that well established policy background it cannot be right that the fact that approval is sought for a 40-year period is accorded more than very limited weight in favour of the scheme in relation to the loss of openness. To do so would go against the concept of permanence*."

The applicant seeks to justify the proposal within the Green Belt as being essential to respond to the Climate Crisis. Research by the University College London (UCL) Energy Institute in 2023, commissioned by CPRE, shows the true potential of rooftop solar in helping to meet net zero targets, protect the countryside and tackle the climate emergency illustrating that large scale solar farms are not actually required. As such, CPRNEY opine that the VSC put forward by the applicant in their planning statement do not trump the significant harm caused to the Green Belt in line with the Inspector's opinion set out above.

In relation to 'Grey Belt'- the applicant puts forward the opinion that the site should be considered 'grey belt' – i.e. land that does not strongly contribute to any of the purposes set out in paragraph 143 of the NPPF stating within the Planning Statement that "*The development of suitable and sustainably located Grey Belt for a renewable energy Proposal to meet the energy and decarbonisation needs of a nearby large employer should be viewed in the planning balance as achieving the key aims and objectives of national and local policy. This is fundamental in the argument in support of the Proposal and should be weighed against the limited impacts the environment*."

National Planning Guidance has been updated to reflect Grey Belt and sets out that the Government expects '*In order to identify grey belt land, authorities should produce a Green Belt assessment, either as part of the review of Green Belt boundaries during the preparation or updating of a local plan, or at another relevant point.*' (ref: Paragraph: 002 Reference ID: 64-002-20250225). As such, the argument for grey belt land in this case is premature.

The site is identified as Locally Important Landscape Area ('LILA')in the Sleby Local Plan which includes characteristics such as large-scale rolling farmland, elevated above the low-lying plain to the east and offering wide views across the adjacent landscape; Deep valleys featuring pasture and calcareous woodlands, including sections of ancient semi-natural woodland. The 2019 Selby Landscape Designation Review highlighted that LILAs are clearly identified as having policy protection. Policy ENC15 states '*priority will be given to the conservation and enhancement of the character and quality of the landscape. Particular attention should be paid to the design, layout, landscaping of development and the use of materials to minimise the impact and to enhance the traditional character of buildings and landscape in the area within the locally important landscape areas*.'

CPRENEY consider that the solar scheme will introduce industrial and modern elements into the rural landscape which will be completely incongruous within the landscape as evidenced by the applicants LVIA visuals receptor assessment. Furthermore, should the Council be minded to approve the proposed development, open views of the solar farm should be minimised as much as possible – including long distance views. CPRENEY consider that more attention should be paid to the mitigation plan – particularly an increase in tree planting which would help the site assimilate more comfortably into the landscape and retain the wooded character of the LILA.

The proposed site impacts on the existing bridleway which runs through and adjacent to part of the site. It is considered that as there are not many PROWs within the area, the impact on this particular route will thus be more greatly affected. The applicants LVIA has identified some moderate-adverse impacts on visual amenity and to landscape character from various viewpoints particularly from within the site from the various PRoWs. CPRENEY acknowledge that the applicant has proposed a series of landscaping and screening measures to mitigate the impacts. In theory this is welcomed by CPRENEY, however, in reality, planting – providing it is successful, can take upwards of 10 years to mature and provide the intended screening effects and as such CPRENEY believe that this will deter existing users from utilising the PRoW network at these locations.

CPRENEY are well aware that access to the countryside for both mental and physical health provides many benefits to our members and to visitors to the area alike, especially since the start of the COVID pandemic. As such, these benefits to health and wellbeing are material factors in the determination of planning applications. CPRENEY are concerned that users of the adjacent bridleway will be discouraged from using these routes at this location as a result of the proposal. It is acknowledged that mitigation planting has been proposed, however, 10 years is a long time to wait for growth and then, as can be seen from the applicants LVIA, the effects of the development, will not necessarily be made better at that location, where some areas considered to still have an adverse effect. The topography is such at this location that users are able to access the countryside easily including those with mobility impairment, without travelling a great distance from relatively large urban areas, as such the Council's existing PRoW network should be protected and enhanced in line with planning policy including CS Policy SP18.

It is understood that the bridleway is utilised frequently by horse riders in the local area. The British Horse Society has published a guidance note on Solar Farms which sets out '*The potential effect of solar farms on horses should be carefully considered on any route used by horses – including byways, bridleways, roads and permissive routes – and on equestrian businesses where horses are kept or trained*.' The note goes on to set out the varying ways in which solar farms can impact on the welfare and safety of horses and their handlers including from vehicular movements and noises associated with construction, glint and glare dependent on the positioning of the arrays, noises associated with inverters -particularly when energy generation is high, has been reported as very intrusive and may be disturbing to users of bridleways, horses kept nearby or equestrian businesses. Higher standards of sound insulation on the housing of inverters may be required where they are within audible range of horses. A horse's range of hearing is wider than a human's and sounds are audible at lower decibels. Furthermore, the guidance document states that equestrian routes should not be 'tunnelled' by high fences and screening.

CPRENEY would therefore be concerned that the welfare of horses and indeed safety of the riders have not been fully considered which is a material consideration weighing against the proposals in the planning balance.

Conclusion

('CPRENEY') welcomes the opportunity to comment on this application for the construction and operation of a solar farm comprising up to 49.9MW (AC) and associated infrastructure, at land East Of Leys Lane, Knottingley, for a period of 40 years. The proposed development is a private wire solar farm with the primary aim of generating electricity to power the Ardagh Glass Packaging Plant.

CPRENEY recognises the sustainable benefits of generating an energy supply for the plant. However, consider that there is sufficient opportunity for the plant to be powered by on-roof solar and the creation of carpark canopies in order to prevent the need for loss of large scale greenfield land, particularly that which is in agricultural usage.

For the reasons set out within this report, CPRENEY object to the proposal at this location.

CPRENEY do not object to the generation of renewable energy by solar arrays and consider that the generation and supply of low carbon energy will be core to achieving the UK goal of net zero carbon emissions by 2050 or earlier. However, at this location, it is considered that the loss of BMV arable land and impact on soils, the loss of openness and permanence to the Green Belt, the harm to the policy protected Locally Important Landscape Area, the detrimental impact on users of the adjacent bridleway, including, the potential detrimental impact on the safety and welfare of equestrian activities and horses, is such that the harm does not outweigh the benefits of the scheme in the planning balance. As proposed, the development would not be in conformity with local or national planning policies.

CPRENEY reserve the right to comment further should additional information be submitted in support of the proposal and respectfully request that this proposal is refused.