

# **APPEAL BY RES LTD**

**AGAINST THE DECISION OF RUSHCLIFFE COUNCIL TO REFUSE PLANNING PERMISSION FOR Installation of renewable energy generating solar farm comprising ground-mounted photovoltaic solar arrays, together with substation, inverter stations, security measures, site access, internal access tracks and other ancillary infrastructure, including landscaping and biodiversity enhancements.**

## **AT LAND AT**

**Land East Of Hawksworth And Northwest Of Thoroton, Shelton Road  
Thoroton Nottinghamshire**

**PROOF OF EVIDENCE OF MR SAM FRANKLIN BSc (Hons) MSc MRICS  
FAAV FBIAC PIEMA MISoilSci.**

**On Behalf of the Rule 6(6) Party, the Hawksworth and Thoroton Action  
Group (HTAG)**

**PINS REF: APP/P3040/W/23/3330045**

**LPA APPLICATION REF: 22/02241/FUL**

**LPA APPEAL REFERENCE: P24-0105**

**Landscape Land and Property  
Village Farm  
Thorncote Green  
Sandy  
Bedfordshire  
SG19 1PU**

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# 1. Qualifications and Experience

- 1.1 My name is Sam Franklin, and I am the Director of Landscape Land and Property Ltd, which I established and have operated since 2001. I have a BSc with Honours in Agriculture from Newcastle University and am a Professional Member of the Institute of Soil Scientists and Life Member of the British Society of Soil Science, with over 35 years' experience of agriculture, soils, planning and rural property. I am a Practitioner Member of the Institute of Environmental Management and Assessment and a Fellow of the British Institute of Agricultural Consultants.
- 1.2 I have considerable practical soils-based experience including regularly preparing agricultural land classification assessments for private clients, local planning authorities and planning consultancies. I have completed a number of soil and environment-based courses at Cranfield University including soil classification, soil survey, land evaluation and soil and water management, together with an MSc. I am also a member of the Agricultural Land Drainage Panel of the Lands Tribunal, a Member of the Royal Institution of Chartered Surveyors and a Fellow of the Central Association of Agricultural Valuers.
- 1.3 My agricultural and soils experience is comprehensive, having grown up on a mixed livestock and arable farm in Bedfordshire, also having worked on other livestock, arable and vegetable farms in the wider area, as well as administering sheep and cattle enterprises for the RSPB in a variety of locations around the UK and previously being co-director of a farming company in Cambridgeshire. I have lived most of my life around the family farm and have been involved in the operation of the farming business for 40 years. I previously managed an agricultural portfolio for the former Bedfordshire County Council with minerals and land restoration projects and spent

two years working for the Overseas Development Agency/Department for International Development on a land and agricultural development project.

1.4 I regularly undertake agricultural related appraisals for Local Planning Authorities in the Eastern and East Midlands Regions including agricultural land classification and other soil-based assessments, general agricultural and equestrian appraisals, and wider rural planning advice. In the last five years, I have undertaken over 250 separate agricultural related appraisals for LPAs, in addition to a similar number of tasks for private clients. Between 2010 and 2014, I worked as a consultant to Natural England undertaking soil husbandry and soil and water assessments as part of the Catchment Sensitive Farming initiative. More recently I have given evidence at Solar Farm planning inquiries for National Infrastructure Projects. In the last 5 years I have prepared more than 40 Agricultural Land Classification reports relating to solar and renewable energy projects alone.

1.5 The evidence I have prepared and provide in this proof is true and I confirm the opinions expressed are my true and professional opinions.

1.6 My evidence relates to agricultural land classification specifically and the agricultural and farming impact generally.

1.7 My evidence is set out in the following order:

1. Qualifications and Experience
2. Instructions
3. Description of Site
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1.8 I first inspected the appeal site in April 2024. I am familiar with the general area having travelled through it on many occasions in the past and I have undertaken land and farming based appraisals in the area, on occasion.

## **2. Instructions**

2.1 My company was contacted in April 2024 to ask if we would provide independent expert evidence at appeal. I subsequently visited the site in April and May and undertook a limited agricultural land quality and soil resource survey of it. My evidence considers the results of the appellants' ALC survey (CD 1.29/1.29.1), and the site selection process, together with the Outline Construction Environmental Management Plan (CD 1.28) if the site were to be developed as proposed.

2.2 The background to my instructions is partly explained in that HTAG broadly agrees with the reasons for refusal given by the Planning Authority but considers that the fact that the site would use a significant amount of Best and Most Versatile (BMV) agricultural land should also have been an additional reason for refusal.

2.3 The site has been surveyed by Land Research Associates (LRA) for agricultural land grading purposes and that report identifies the site as being at least 38% BMV.

2.4 The extent to which I agree with the ALC report's methodology, terminology and judgement is recorded in the statement of common ground.

### **3. Description of the Site and its Surroundings**

- 3.1 The appeal site is a collection of undeveloped fields, primarily arable land, in use for combinable crop growing with small areas of grassland and woodland within the open countryside west of the hamlet of Thoroton and east of Hawksworth.
- 3.2 The topography of the site is gently sloping down towards the southern area of the proposed development which drops gently from around 25m AOD at the northern boundary to just 17m AOD near the centre of the site.

## **4. Policy and Guidance**

### **National Policy**

- 4.1 Section 11 of the National Planning Policy Framework Dec 2023 (NPPF), paragraphs 123 and 124:-
- 4.2 Paragraph 180 and 181 of the NPPF provides government policy regarding agricultural land. Footnote 62 is relevant also with regard to a preference for poorer quality land and food production.

### **Local Policy**

- 4.3 The proposals would entail the development of significant areas of best and most versatile agricultural land, contrary to Policies 1 and 16 of LPP2.
- 4.4 Policy 1 does not distinguish between the different grades that make up best and most versatile and therefore where a site is or is predominantly best and most versatile Policy 1 does not support development. It also aims to minimise soil disturbance as far as possible.

## 5 Agricultural Land Quality of Site

- 5.1 There is no dispute between the parties that the proposals will result in the development of at least 94.3 hectares (ha) of agricultural land for at least 40 years and, according to the appellant's own ALC report around 38% of this land is Best and Most Versatile.

### Geology and Soils

- 5.2 The geological maps show the underlying geology to be of the Cropwell Bishop Formation – now known as the Branscombe Mudstone. Part of the area in the north-west is shown as Arden Sandstone Formation. Remaining parts of the site in the central and eastern areas are shown as overlain by Quaternary river alluvium, with some areas of sand and gravel deposits in the northern and eastern parts, and along the western boundary. A 1:250,000 scale soil map of the wider area in **Appendix 1**, shows that Whimble 3 (572f) and Fladbury (813b) Associations predominate the site, as further detailed in **Appendix 2**. These soils are common across the District in general and the further midlands region.

### ALC Methodology

- 5.3 The standard method for assessing ALC is known as *The Revised Guidelines for Agricultural Land Classification* (MAFF 1988) (CD 9.1). It sets out in detail a process for assessing the soil and agricultural limitations using:
- (a) climatic data,
  - (b) the depth to any slowly permeable layer (subsoil clay on this site);
  - (c) the texture of the topsoil and/or the stone content in the soil;
  - (d) the soil depth and structure;
  - (d) interactive soil based considerations, including wetness, droughtiness and
  - (e) the amount of Calcium Carbonate in the top 25cm of soil.

Together these assessments and calculations allow the grading of agricultural land. There is no other recognised methodology in England for grading agricultural land.



5.4 The normal density of soil sampling is detailed in Natural England guidance note TIN049 (CD 9.2). It recommends a density of sampling at 1 per hectare. In the appellants case, around 90 samples have been taken and assessed in order to determine the grade or grades of the appeal land. This is slightly short of the total number, but I do not consider the unsurveyed area to be dramatically different, having inspected the site.

5.5 The appellant’s ALC asserts that the land is mainly subgrade 3b, but with significant quantities of subgrade 3a and some smaller areas of Grade 2. As such there is a significant amount of BMV land present and none of the land is poor quality, all being either moderate, good or very good quality, as set out in the table below.

**ALC Grades across the Site**

<b>ALC Grade</b>	<b>Description</b>	<b>Area (%)</b>	<b>Area (Ha)</b>
<b>Grade 2</b>	Very Good	2	1.7
<b>Grade 3a</b>	Good	36	33.7
<b>Grade 3b</b>	Moderate	58	54
<b>Unsurveyed</b>		4	3.9
<b>TOTAL</b>		100	93.3

**Long Term Effects**

5.6 The proposed development would result in the loss of 34.4 hectares of Best and Most Versatile Land. The stated impact of this scheme is that the proposed development is “temporary”, and the proposed development is “reversible”. My concern is that after 40 years the site may not be able to return to arable farming and that land quality may also be affected. There is little evidence provided that the site will ever return to formal agriculture, let alone arable farming, or that its fertility and soil health will be maintained.

5.7 The agricultural land classification report and outline construction and environmental management plan do not include information such as measurements of current organic matter content of the soil or soil carbon/nutrient stocks, making it impossible to assess the success or failure of the site construction, management and dismantling regimes to deliver any carbon capture benefits. However, **Appendix 3** to my proof identifies that there are arable based systems whereby carbon can be captured such that the perceived benefits of taking this land out of production can be minimised, whilst food production is maintained. These include minimal tillage, regenerative farming techniques, Controlled Traffic Farming and the spreading of rock residues onto farmland. Indeed, as set out a Farmers Weekly article in **Appendix 4**, a farm contractor from Thaxted (Jeremy Durrant, EW Davies Farms) undertaking arable farming is able to demonstrate improvements in soil structure, and soil health whilst reducing costs, using Controlled Traffic Farming.

## 6 Appeal Site Compared with Land in Rushcliffe Borough

6.1 I have assessed the agricultural quality of other land around Shrewsbury using the following information:

- 1:250,000 MAFF Provisional Agricultural Classification of the East Midlands Region, published in the 1970s,
- 1:250,000 Soil Map of Eastern England
- 1:50,000 geological data, and
- Published agricultural land classification maps of various blocks of land around the area, obtained mainly from the database maintained by Natural England and from other planning applications.

6.2 Generally the area around Newark is considered to be of Grade 2 and Grade 3 'undifferentiated' land (**Appendix 5**). The Appeal Site broadly reflects this distinction. The published strategic maps showing likelihood of BMV indicate a high incidence of BMV in the immediate locality, but land close by and adjoining would appear to be of poorer quality, with only a low likelihood of BMV (**Appendix 6**), even with 3-5 km of the site.

6.3 Site selection is addressed in Section 5 of the Appellant's Statement of Case. From this, it appears that the Appellant did not consider any other site, despite the significant constraints of the Appeal Site.

6.4 The Appellant's criteria for choosing the Appeal Site are summarised as:

- 1) That it was close to a grid connection.
- 2) There are good levels of solar irradiation.
- 3) The site is not within any statutorily designated area.

6.5 The Appellant has not explained why sites on non-agricultural land or land of poorer quality were not considered, although these sites are clearly preferred under national policy. The standard approach is to consider a 3-5km radius around the grid connection point and from the Provisional ALC map it can be seen that there is a lot

of medium quality grade agricultural land. The Best and Most Versatile map also shows the likelihood of poorer quality land east of Thoroton and north of Hawksworth to be much greater.

6.6 Whilst the Newark area and Rushcliffe Borough is widely reported to have a relatively high incidence of BMV, there is also considerable amount of land as Grade 3 and 4 potentially available, showing low likelihood of BMV and this has not been adequately explored in any detailed Alternative Sites Assessment. The map attached as **Appendix 6** shows the BMV likelihood of the local area.

6.7 The proposed development would take this agricultural land from productive use for at least 40 years, without sufficiently demonstrating a lack of available poorer quality land in the local area, or alternative locations such as brownfield sites.

6.8 The cumulative effect of loss of farmland is of real concern locally and nationally. In a recent statement Dr Dan Poulter, MP for Central Suffolk and North Ipswich stated:-  
*"I should note that while there are alternatives to consuming high-quality agricultural land for producing green energy, there are few alternatives to agricultural land for the production of food"*.

6.9 The impacts of the proposed development on the agricultural land resource, as described by the appellant, are based on the assumption that the development is judged to be merely a temporary use, despite a projected, lengthy 40-year plus timespan. The construction and operational phases of the development are only considered in this context.

## **7. Damage to Soil and Return to Agriculture**

7.1 There is little or no stoniness in the top 25-30cm of soils across the whole site and most of the top soils are also clay loams, with similar subsoils. The soils at the appeal site when they are wet, are particularly vulnerable to compaction and soil damage, which can be difficult to remedy and can therefore last for the duration of the project

and beyond, following construction activities at decommissioning - soil types with only moderate resilience to structural damage when being trafficked include such heavy soils where clay content is greater than 27% and rainfall is less than 700mm.

7.2 Photographs in **Appendix 7** to my proof show the kinds of soil structural damage that can occur during construction. The pressure to complete construction of the solar farm is likely to take priority over any damage to the soil. However, evidence shows that these soils are difficult to repair and remedy once seriously damaged.

7.3 It is difficult to remedy using normal agricultural equipment, as the panels, once installed, prevent ease of cultivation, such that compaction and structural damage can remain until panels are removed or even beyond. The compaction can cause long term drainage issues that affect both soil quality and the ability of the soil to absorb water, leading to increased run-off and localised flooding. As water washes off solar panels, it collects on the grassy areas between the panels, along with the normal rainfall falling. As such, the un-panelled areas receive more of the rainwater, whilst the areas under the panels can remain much drier.

7.4 Additionally, when machinery is used to cut the grass or clean the panels, damage to the soil can occur through excessive trafficking when wet. Again, contractual obligations and time pressure encourages operatives to work in less than ideal conditions and this can cause soil damage that persists long into the projects life.

7.5 **Appendix 8** includes photographs of the site taken in recent years following flooding incidents and it is clear that the land is vulnerable to flooding in places, despite the Environmental Agency flood maps. The Environment Agency recently reviewed climate change allowances for all of the river basin management plans after the 2020 floods. The revised Humber River Basin allowances were published in December 2022. A revised flood map **Appendix 9** covers a large part of the site.

- 7.6 A detailed soil management plan is essential for the construction, operation and decommissioning of such a solar site, but is not included with this application. Whilst there is an outline construction and environmental management plan the impact on soils is not fully considered, particularly during construction. During construction and decommissioning works, bare soil on sloping ground can quickly erode away due to surface water runoff, and potentially, be lost, ending up where it is not wanted, for example in other fields, watercourses, and on roads. Section 2.2.4 of the ADAS / Welsh Government report (CD 9.3) explains (and illustrates, at Figure 6 – Photo **Appendix 10**) that ‘There is likely to be some instances of run-off from the solar panels, which could result in the compaction of soils at the base of the panels (Choi et al, 2020). Over time rivulets can form along the trailing edge of the panel with potential risk of soil erosion creating rills and gullies across the site. The sand bed could act as a drain, especially on heavy textured soils, leading to drainage discharges or wet patches at the down slope end of each trench’.
- 7.7 The Appellant claims that the proposals would deliver biodiversity net gain of some 26%. This figure is highly doubtful. A large component of the claimed net gain arises from the purported planting of a species rich grassland mix across most of the site. However, what is proposed does not appear to be species-rich grassland, which is extremely difficult to establish, especially on previously cultivated land, Natural England Technical Information Note 66 confirms this (CD 9.5).
- 7.8 Both the arable and grassland are said to have been subject to high fertilizer inputs. The biodiversity management plan (BMP) proposes to address the enrichment of the soil by inversion (burying of topsoil and bringing subsoil to the surface), which would also aim to remove the robust grass species that the Appellant says currently predominate. Paragraph 1.73 of the biodiversity management plan states:
- It is recommended that soil inversion take place prior to grassland sowing. In addition, given that current grassland species within the red line boundary are dominant, robust*

*and competitive species such as Yorkshire fog and perennial rye grass, it is recommended that a grass such as yellow rattle be sown first in order to weaken these dominant grass species.*

- 7.9 Soil inversion is a procedure specifically to reduce soil fertility to assist in the propagation of lower fertility grass species that thrive in poorer soils. Whilst this may lead to environmental benefits it can also lead to downgrading of the agricultural land quality by the 'raising' of heavier soils into the topsoil, particularly where they are relatively shallow as is the case here.
- 7.10 In addition the long term planting of species rich habitats may require an environmental impact assessment under the **Environmental Impact Assessment (Agriculture) Regulations**. At the end of the solar project, land managers wishing to return the land to cultivation or other intensive use may need to apply to Natural England for an EIA screening decision if the land has not been cultivated for more than fifteen years and it is greater than 2 ha in size. This makes the return of the site to agriculture less likely.
- 7.11 Soil inversion of heavy soils as described on the Appeal Site (The ALC survey refers to dense clay subsoil across the whole site) is challenging even for larger agricultural machinery and multiple passes would be required to produce a tilth. This would not be possible under the solar panels themselves and difficult in the undeveloped areas. From the drawings it is not clear how much space would be left between the arrays, but it is unlikely to enable access for larger agricultural vehicles.
- 7.12 The lack of light beneath the panels could inhibit the growth of most plant species but may encourage grassland weeds. Many solar sites are managed by a combination of cutting and use of herbicides and this is what is proposed in the BMP. This advises annual management of the "species-rich grassland" entailing mowing, weed control interventions (application of herbicides) and applications of fertilizer.
- 7.13 While applicants for solar development often claim that agricultural use of the land will continue in the form of sheep grazing, in practice this is rare, not least because it

is impractical and can have an impact on welfare. Sheep cannot easily be seen between/under the panels as required to check for common and urgent problems such as fly strike and foot rot.

- 7.14 The grazing would be little more than a means of managing the grassland and would not offer any meaningful agricultural contribution. The BMP advises at 1.79 that sheep would be stocked at a density of 0.2 – 0.5 livestock units (LU) per hectare per year, in accordance with Plantlife guidance. This is the equivalent of some 2-5 sheep (each 0.12 LU) per hectare which is very low agriculturally speaking.
- 7.15 This part of Nottinghamshire is a mainly arable farming area and whilst there are sheep and other livestock farms, they tend to be small and disparate. Even allowing for the possibility of sheep grazing it is likely that there will be times when graziers cannot be found – the landowners are not sheep farmers. **Appendix 11** to my proof sets out some concerns regarding the issues associated with sheep grazing under panels. The reality is that grass often does not grow well under the panels and bare earth, or weeds can become a problem that need to be sprayed or cut.
- 7.16 Additionally the Appellants have reduced the height of the panels from 2.8 to 2.4m. Given they each panel will be @.2.27 x 1.13m (though measurements given vary), this would give a maximum ground clearance of only 14 cm. The panels would need to be much higher off the ground if sheep were to be grazed to prevent damage.
- 7.17 According to the National Sheep Association, typical sheep stocking densities are between 15 and 25 head per hectare. The proposed level of grazing on a solar site is a management arrangement rather than continued agriculture. Continued sheep grazing may be achievable, but the land could realistically only be put to that purpose, thus its agricultural flexibility is severely curtailed.
- 7.18 This matter has not been addressed in any of the Appeal documents, which, other than advising that cereal crops have been grown on the arable land, provide very limited information about the current agricultural uses.



- 7.19 Research conducted on behalf of the Welsh government (CD9.3), found that the process of constructing solar developments caused significant damage to agricultural land, such that it may never be capable of restoration. Typically, agricultural quality was reduced.

## **8. Food Security and Food Imports**

- 8.1 The loss of any productive arable land to growing crops is a relevant issue in terms of the protection of Best and Most Versatile land, paragraph 124b of the NPPF recognises the importance of undeveloped land and the role it can play in food production, as well as flood mitigation. Nearly half of what we eat in the UK comes from abroad, and two-thirds of that has in recent years come from the EU. The NFU confirm that UK self-sufficiency is only at 58%. With the recent war in Ukraine, problems in the Middle East affecting the Suez Canal, more dramatic weather events and the uncertainty of supply of core commodities such as wheat, there have been both supply issues and huge price fluctuations. This has refocussed attention on food security in the UK and the need to protect productive farmland from development and long-term decline.

- 8.2 “There are three cornerstones on which a prosperous farming sector must be built and which any government should use to underpin its farming policy. They are boosting productivity, protecting the environment, and managing volatility” (source Minette Batters, NFU president, Feb 2023). The country must “never take our food security for granted,” she said, **Appendix 12**.

- 8.3 The United Kingdom Food Security Report (CD 9.4) states:-

*Food security is a complex and multi-faceted issue. It is structured around five principal ‘themes’, each addressing an important component of modern-day food security in the UK. They are as follows:*

- *Global food availability, which describes supply and demand issues, trends and risk on a global scale, and how they may affect UK food supply;*
- *UK food supply, which looks at the UK's main sources of food at home and overseas;*
- *Supply chain resilience, which outlines the physical, economic, and human infrastructure that underlies the food supply chain, and that chain's vulnerabilities;*
- *Household-level food security, which deals with issues of affordability and access to food; and*
- *Food safety and consumer confidence, which details food crime and safety issues.*

8.4 The report notes that the biggest medium to long term risk to the UK's domestic production comes from climate change and other environmental pressures like soil degradation, water quality and biodiversity. Wheat yields dropped by 40% in 2020 due to heavy rainfall and droughts at bad times in the growing season. This is an indicator of the effect that increasingly unreliable weather patterns may have on future production. When UK production is reduced, we are more dependent on imported commodities. The war in Ukraine has highlighted the vulnerabilities of such a strategy.

8.5 The UK has a productive agricultural sector and a domestic agri-food manufacturing industry that produces food to high standards. The amounts and types of food produced are driven by market forces and consumer demand for goods, rather than by assessment of overall quantity of food or of self-sufficiency. Many factors affect the output of domestic production, including:-

- The availability and suitability of land for particular forms of production.
- Inputs such as labour, water, fertiliser, pesticides, and seeds.
- Climate and environmental factors such as soil health and rainfall.

8.6 In 2020, 71% of UK land area was used for agricultural production, the majority of this being grassland for grazing rather than crops. Not all land is suitable for growing crops, and some is suitable only for specific crops, particularly those in the BMV categories.

8.7 The United Kingdom Food Security Report notes:-

*Domestic production faces a number of long-term and short-term risks, including soil degradation, drought and flooding, diseases, risks to fuel and fertiliser supplies, and changing labour markets. In the long term, climate change impacts **are likely to have a negative effect on the proportion of high-grade arable farmland available in the UK.***

## **9. Summary and Conclusions**

- 9.1 The presence of 38% BMV demonstrates that the proposal does not meet local or national policy. These policies clearly state that BMV land should be avoided, unless certain criteria are met, for development. The NPPF requires policies and decisions to protect and enhance soils as well as recognise the economic and other benefits of the best and most versatile agricultural land, this application does not achieve this.
- 9.2 The ALC report identifies at least 38% of the site as BMV making the site inappropriate in accordance with Local Plan Policy and NPPF. Local farming evidence provided by neighbours indicates that the appeal site is good reliable farmland able to produce a wide range of crops. Its loss to local agriculture will be both significant and cumulative.
- 9.3 The use is described as temporary, but it is still very long term and will take productive land out of arable farming and potentially horticulture if it proceeds. Substituting this for occasional, very low-level sheep grazing, even if this did occur, is of limited agricultural benefit beyond keeping land tidy. The return of the site to agriculture after 40 years is doubtful and may be restricted by environmental constraints.
- 9.4 There is no baseline measurement of soil carbon to demonstrate improvements in soil carbon over the life of the project. However, with these high clay content soils, there is a significant risk to soil structure and drainage during the construction and commissioning period that could cause long term damage to the soil quality. In addition, due to the nature of the site and the additional built footprint this could lead to localised flood run-off issues.
- 9.5 There is little scientific evidence available that taking very good and good quality land out of arable production for the erection of the solar panels will eventually return the land to similar quality in 40 years' time or that it will somehow be improved.

Additionally, some of the land will be permanently lost due to the construction of tracks, bases for infrastructure and the substation.

- 9.6 Any inversion of the soil to lower fertility as a precursor to 'improving' biodiversity risks damage to soil structure and land quality by changing the topsoil texture. Once changed this could downgrade the land quality by definition. Including the land in species rich habitats can also reduce the likelihood of the land returning to agriculture at the end of the project. It is recognised that it is difficult to establish species-rich grassland on previously cultivated soils.
- 9.7 The loss of this significant BMV agricultural land is in direct conflict with Policies of the Local Plan and conflicts with National Policy. There is poorer quality land locally, but the appellant has chosen not to undertake an alternative site selection assessment and therefore does not provide the 'compelling' evidence necessary to demonstrate that there are no, poorer land quality, alternative locations within the search area, or configurations of the scheme, that would avoid the loss of BMV agricultural land.

## **10. List of Appendices**

1. Soil Map of general area
2. Soil type descriptions
3. Anglia Farmer Article
4. Alternative ways to sequester carbon
5. Map of Agricultural Land Classification Grades in the general area
6. Map of Likelihood of Best and Most Versatile Land locally
7. Photographs of Soil Structural Problems during construction and management
8. Photos of Site Flooding
9. New Flood Awareness Map and Amended Climate Change Allowances
10. Photographs of Research into Soil structural
11. Sheep Grazing under panels
12. National Farmers Union Concerns

## **11. List of Core Documents Referred To**

Appellants Agricultural Land Classification

MAFF Revised guidelines and criteria for grading the quality of agricultural land

Technical Information Note 049 Natural England

National Planning Policy Framework

Rushcliffe Local Plan

UK Food Security Report 2021

Outline Construction Environmental Management Plan