LAND AT THORNHOLME

AGRICULTURAL LAND CLASSIFICATION REPORT

for

Ridge Clean Energy

April 2021

by

Daniel Baird Soil Consultancy Ltd

Introduction and Policy Guidance

1. This report has been prepared by Daniel Baird Soil Consultancy Ltd on behalf of Ridge Clean Energy. It provides an assessment of the quality and versatility of agricultural land at a proposed development site, Land at Thornholme.
2. The area under investigation is proposed for renewable energy development, deployment of Solar Photo Voltaic (PV) panels. The site totals approximately 64.8 hectares in area, which is situated on farm land near Thornholme, to the west of Bridlington. The location and extent of the proposed site is shown on the attached plan.
3. When surveyed in March 2021 agricultural land at the site was in arable use with no stock proof fencing.
4. This appraisal of agricultural land quality is consistent with the direction given by the National Planning Policy Framework[i] (NPPF) (Department of Housing, Communities and Local Government, February 2019). Paragraph 170 states: -

   > Planning policies and decisions should contribute to and enhance the natural and local environment by:
   >
   > a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
   > b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
   > c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
   > d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
   > e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
   > f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

5. The glossary of the NPPF gives the following definition.

   > *"Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification."*

6. Accordingly a detailed assessment of the site was undertaken in March 2021 using the Ministry of Agriculture Fisheries and Food (MAFF) revised guidelines and criteria for Agricultural Land Classification[ii] (ALC) published October 1988.
7. Use of the ALC methodology is also supported by Natural England Technical Information Note 049[iii] (TIN049) published January 2009. TIN049 provides additional guidance on how an ALC field assessment should be undertaken, with a detailed assessment studying the soil profile to a depth of up to 1.2m at sample points with a density of approximately one per hectare across the site agricultural land.

8. To supplement the NPPF the Department of Communities and Local Government also provides an online library of Planning Practice Guidance[iv]. Planning Practice Guidelines for Renewable and Low Carbon Energy (PPGRLCE), Paragraph 013 identifies particular planning considerations that relate to the development of large scale ground mounted solar PV sites. Regarding agricultural land, particular factors a local planning authority will need to consider include:

> *"where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays."*

9. Paragraph 013 of the PPGRLCE makes reference to a speech by the then Minister for Energy and Climate Change in April 2013[v] in which they state that

> *"Where solar farms are not on brownfield land, you must be looking at low grade agricultural land which works with farmers to allow grazing in parallel with generation…"*

10. Paragraph 013 also references a written ministerial statement of 25 March 2015[vi] which states

> *"In light of these concerns we want it to be clear that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence. Of course, planning is a quasi-judicial process, and every application needs to be considered on its individual merits, with due process, in light of the relevant material considerations."*

11. Local planning policy for the East Riding of Yorkshire council area is given in the of the East Riding Local Plan (adopted 1998)[vii]. Policy S4 : Supporting Development in Villages and the Countryside covers the conservation of best and most versatile land. Relevant sections of the policy state that: -

> *"Outside of the settlements listed in Policy S3, development will be supported to help maintain the vibrancy of Villages (listed in Appendix B) and the Countryside where it: 3. Does not involve a significant loss of best and most versatile agricultural land."*

<u>Proposed Development</u>

12. The proposed development would comprise solar PV panels mounted on steel frames. These frames would be secured on the site either by driving the legs into the ground as a small removable pile, or by using weights on top of the frame base. The frames will not use a permanent foundation. Services on the site (electrical cabling) may be buried but these will be simple shallow trenches rather than concrete lined trunking. Planning consent would be time limited with a condition for the removal of the Solar PV development at the end of the consented period. Therefore, in contrast to consent for permanent land use change for built development such as residential or commercial buildings, the Solar PV site will be returned to its current agricultural use on decommissioning of the Solar PV panels, using only standard agricultural machinery such as a tractor and backhoe.

<u>Agricultural Land Classification Methodology</u>

13. The MAFF ALC system of grading land quality for use in land use planning purposes divides farmland into five grades according to the degree of limitation imposed upon land use by the

inherent physical characteristics of climate, site and soils. Grade 1 land is of an excellent quality, whilst Grade 5 land has very severe limitations for agricultural use. The ALC system is designed to be independent of land management so that there is no incentive for poor management of land to obtain development consent. Best and most versatile agricultural land that through sustained arable cropping has become exhausted, with diminished organic matter degrading the structural stability of the topsoil, is not downgraded in the ALC system.

14. The MAFF revised guidelines and criteria for ALC of October 1988 require that the following factors be investigated:

- Climate: Average Annual Rainfall (AAR) and Accumulated Temperature above 0°C between January and June (AT0)
- Site: Gradient, Micro Relief and Flooding
- Soils: Texture, Structure, Depth, Stoniness, and Chemical Toxicity
- Interactive Factors: Soil Wetness, Soil Droughtiness and Liability to Erosion

<u>Agricultural Land Classification Assessment</u>

Climate

15. Climatological data for ALC are provided for 5km intersections of the National Grid by the Meteorological Office, in collaboration with the National Soil Resources Institute. The data from these points can be interpolated providing climate data for specific sites. Interpolated data for the Thornholme site is given in Table 1 below: -

Table 1: Thornholme Solar PV Agricultural Land Classification Climate Data

Reference Point:	TA 120 654
Altitude (m)	35
Average Annual Rainfall AAR (mm)	710
Accumulated Temperature AT0 (day degrees)	1346
Moisture Deficit for wheat (mm)	106
Moisture Deficit for potatoes (mm)	97
Field Capacity Duration (days)	175

16. The main parameters used in the assessment of an overall climatic limitation are AAR as a measure of overall wetness, and AT0 as a measure of the warmth of the site in the growing season.
17. Climate does not impose an overall limitation on ALC grade at this site. Climate does however have an important influence on the interactive limitations, soil wetness and soil droughtiness.

As the site is relatively warm and dry, soil droughtiness limitations are enhanced and soil wetness limitations are reduced.

The Site

18. The site lies to the south west of Bridlington. The land is predominantly gently sloping with a southern aspect, but with a gently rolling topography across the site. A distinct step is present along the line of the field boundary running north to south. This step appears to be an artifact, with sediment displaced by cultivation accumulating along a field boundary. In addition a number of depressions are present that appear to have been borrow pits, small scale extraction of the underlying clay and/or chalk for brick and mortar .
19. Gradient and flood risk do not limit land grade at this site.

Soils and Parent Materials

20. The British Geological Survey Geology of Britain Viewer[viii] shows the site to be underlain by the Flamborough Chalk Formation, covered by a superficial drift of Devensian Till for all but the north east quarter where no superficial deposit is mapped.
21. Field survey work found numerous areas of soils developed on the chalk, the presence of these being clearly apparent on the cultivated land with abrupt transition to areas where ploughing brings up numerous chalk stones. The geology mapping is at too small a scale to show the patchwork of presence and absence of the superficial till within the site, and the detailed ALC scale of assessment (sample points at 100m intervals) alone would miss much of this abrupt variation without the ability to see the chalk stones on the unvegetated surface.
22. Soil profiles are shallower and have a higher topsoil stone content where found directly over the chalk geology. However, depth and topsoil stone content do not limit overall ALC Grade at this site.

Interactive Factors

23. Two basic soil profiles are found within the site. The first is a deep and heavy textured soil with a subsoil that impedes drainage. Chalk is occasionally found at depth below this clayey subsoil. This impeded drainage leaves the topsoil wet for an extended period following rainfall, limiting opportunities for cultivation or carrying livestock without incurring persistent structural damage to the soil. This land is limited to grade by soil wetness and workability. The degree of limitation varies within the site dependent upon the depth at which the slowly permeable horizon is encountered and the clay content of the topsoil. Topsoils are calcareous but the site is too wet for this to mitigate the soil wetness limitation.
24. The second basic soil type has a lighter textured profile and may be found directly over the chalk. This land is limited to grade by soil droughtiness, strongest limitation (Grade 3b) being associated with the shallower soil.
25. Laboratory test results for two soil samples are given as an appendix to this report. The locations for these samples are Grid Reference TA 12300 65100, a Medium Sandy Loam, and TA 12500 65100, a Sandy Clay Loam.

Agricultural Land Classification of Land at Thornholme.

26. Detailed ALC survey of the site, following the guidance of TIN049, found agricultural land in ALC Grades 2, 3a and 3b. The plan attached to this report shows the ALC grade distribution within the site, with area estimates given in Table 2 below.

Table 2 – ALC Grade Distribution

ALC Grade	Area (ha)	%
2	6.9	10.6
3a	12.8	19.8
3b	45.1	69.6
Total	64.8	100.0

27. Grade 2 land is found in two pockets that could be discerned at the detailed ALC survey scale. Soil profiles are deep and freely drained medium sandy loams with a slight limitation from soil droughtiness. Both pockets also contain a similar soil that has a clayey lower subsoil impeding drainage. The depth of this lower subsoil and the light texture of the topsoil give a slight limitation from soil wetness.
28. Grade 3a land is found on the higher land to the north of the site and in a band in the south west. Soil profiles consist of medium sandy loam to medium clay loam material found over chalk at about half a meter depth. The shallow depth compared to the Grade 2 land restricts the volume of soil available to retain water, soil droughtiness limiting this land to Grade 3a.
29. Grade 3b land covers the majority of the site with two contrasting soil types. The first is similar to that found on the Grade 3a land but shallower, with a correspondingly more severe soil droughtiness limitation. The second soil type has a heavy textured subsoil that impedes drainage directly below the topsoil. Soil wetness limits this land to Grade 3b.
30. The wet and droughty grade 3b land share the same overall ALC grade but impose different constraints on land management. Land with a soil droughtiness limitation has reduced yield from crop drought stress from the extent of land with that limitation. Land with a soil wetness limitation has a restricted window of opportunity to cultivate without causing prolonged damage to the structure of the wet soil. This soil wetness limitation applies to the land where it occurs but constrains management options for the whole field if structural damage is to be avoided.

Land Quality and the Proposed Development.

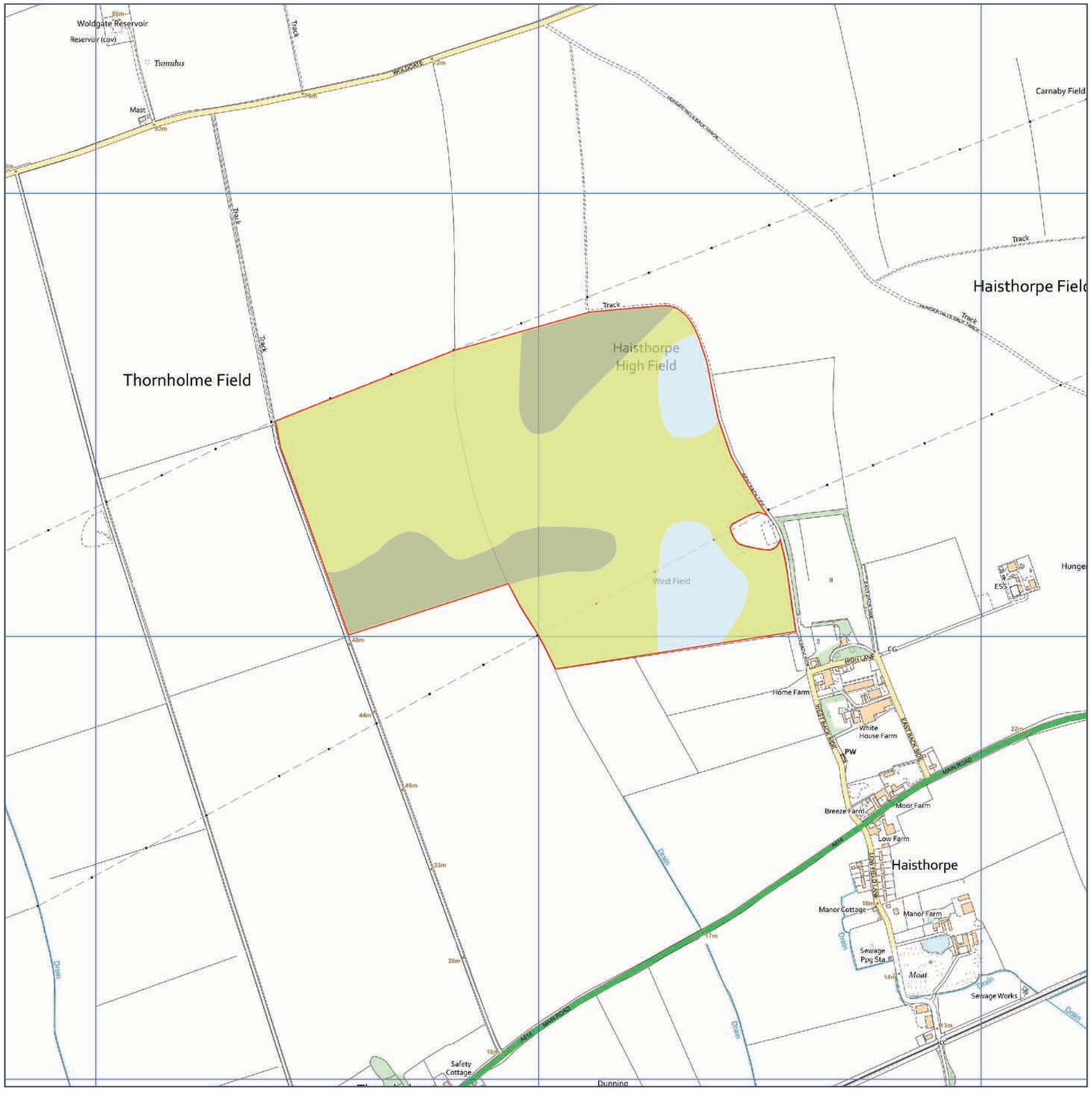
31. As discussed above, the NPPF seeks to conserve the national resource of the best and most versatile agricultural land. Agricultural land and the soil associated with it is, for all practical intents and purposes, a non-renewable resource. Development of building foundations and infrastructure such as roads and rail lines effectively sterilise any further agricultural production from that land area. The soil resource associated with that land can be retained and beneficially reused, but an area of best and most versatile land cannot be effectively translocated. Agricultural land quality is dependent upon characteristics of the location, not just the soil in isolation.

32. Solar PV development differs from built development in that the consent is temporary, is easily reversed and agricultural production can be maintained (though constrained) during the Solar PV consent.
33. The supplementary PPGRE introduces the desirability of maintaining agricultural production and/or enhancing biodiversity on farmland for the duration of any consent for large scale Solar PV. In most instances the transition from combinable crops to a permanent green cover for 40 years should confer tangible biodiversity benefits, regardless of the presence of the solar PV development. Such biodiversity effects are however beyond the scope of this assessment.
34. When considering a Solar PV development proposal, the conservation of the agricultural land resource and quality is of greater importance than the maintenance of continuous arable production. This is as the agricultural land resource is non-renewable. Land use is transient, with productive use of agricultural land varying in response to drivers such as commodity prices, occupancy, diversification opportunities (such as livery) and not least, the current agricultural and environmental policy framework. For instance, in a shorter period of time than the proposed Solar PV planning consent, Common Agricultural Policy transitioned from direct price support for commodities such as wheat, to area payments for cropping in conjunction with 'set-aside' (the requirement to take a proportion of arable land out of any productive use including grazing), through to targeted payments for 'arable reversion' – payment made for a specific field to cease arable production in favour of biodiverse grassland management for an extended period of time. The future of farm support in England is at present highly uncertain but speeches by ministers have emphasised the need to maintain a transition towards rewarding land management for environmental services rather than agricultural production.
35. Grassland below a Solar PV installation should be managed by grazing or cutting to control grass and shrub growth that could shade panels and impede access for maintenance. For the Thornholme Solar PV proposal, the developer intends to manage the grass through a combination of traditional farming practice & using grazing with livestock when stocking allows. This livestock grazing could be an additional source of income from this farmland and will maintain the land in agricultural production while the Solar PV generation is in place. In addition other diversity schemes such as bee keeping will also be considered as innovative farming methods in the future compliment and enhance the farming practice. Therefore, the development proposed does not result in loss of agricultural land resource, and agricultural production, though restricted, can continue through the duration of the Solar PV development.

<u>Agricultural Benefits of Solar PV</u>

36. As noted above, the temporary consent for solar PV does not result in the loss of agricultural land resource or the degradation of its ALC grade. The land can remain in agricultural production, grazing sheep, while providing an additional diversified income to the farm business. At the end of the temporary consent, decommissioning returns the land back to its prior agricultural function with no loss of extent or capability.
37. However the presence of the solar PV confers benefits to arable land through an extended fallow period. The organic matter content of UK arable soils is in long term decline. Cultivation promotes rapid breakdown of organic matter, the soil organic matter content declining to a lower equilibrium. A change of management with no cultivation under the solar PV will enable a return towards a higher equilibrium of soil organic matter. Benefits of this change will be land that is more fertile, easier to cultivate, holds more water and permits more rapid infiltration of rainfall.

38. Compared to annual arable cropping, perennial crop cover will have time develop a root network that can extend further down and through heavy subsoil, accelerating the drying process that helps aggregate soil into structures that improve drainage and further root exploitation of the soil. Although the ALC system deliberately omits soil characteristics that are sensitive to land management (avoiding any incentive to manage land badly to assist planning success), a long term fallow period will enhance the soils functional capacity for supporting agricultural production.



THORNHOLME

Agricultural Land Classification Grade Distribution

KEY

North

Site Boundary

Grade 2

Grade 3a

Grade 3b

NOTES

ALC Grade	Area	Percentage
Site Boundary	*64.8ha*	*100.0%*
Grade 2	6.9ha	10.6%
Grade 3a	12.8ha	19.8%
Grade 3b	45.1ha	69.6%

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Scale 1:10 000 at A3

References

[i] National Planning Policy Framework https://www.gov.uk/government/publications/national-planning-policy-framework--2

[ii] Agricultural Land Classification of England and Wales: Revised guidelines and criteria for grading the quality of agricultural land. Ministry of Agriculture Fisheries and Food, October 1988. http://archive.defra.gov.uk/foodfarm/landmanage/land-use/documents/alc-guidelines-1988.pdf

[iii] Agricultural Land Classification: protecting the best and most versatile agricultural land (TIN049). Natural England, January 2009. http://publications.naturalengland.org.uk/publication/35012

[iv] Department for Communities and Local Government. Planning Practice Guidance library http://planningguidance.planningportal.gov.uk/

[v] April 2013 Speech by Minister for Energy and Climate Change https://www.gov.uk/government/speeches/gregory-barker-speech-to-the-large-scale-solar-conference

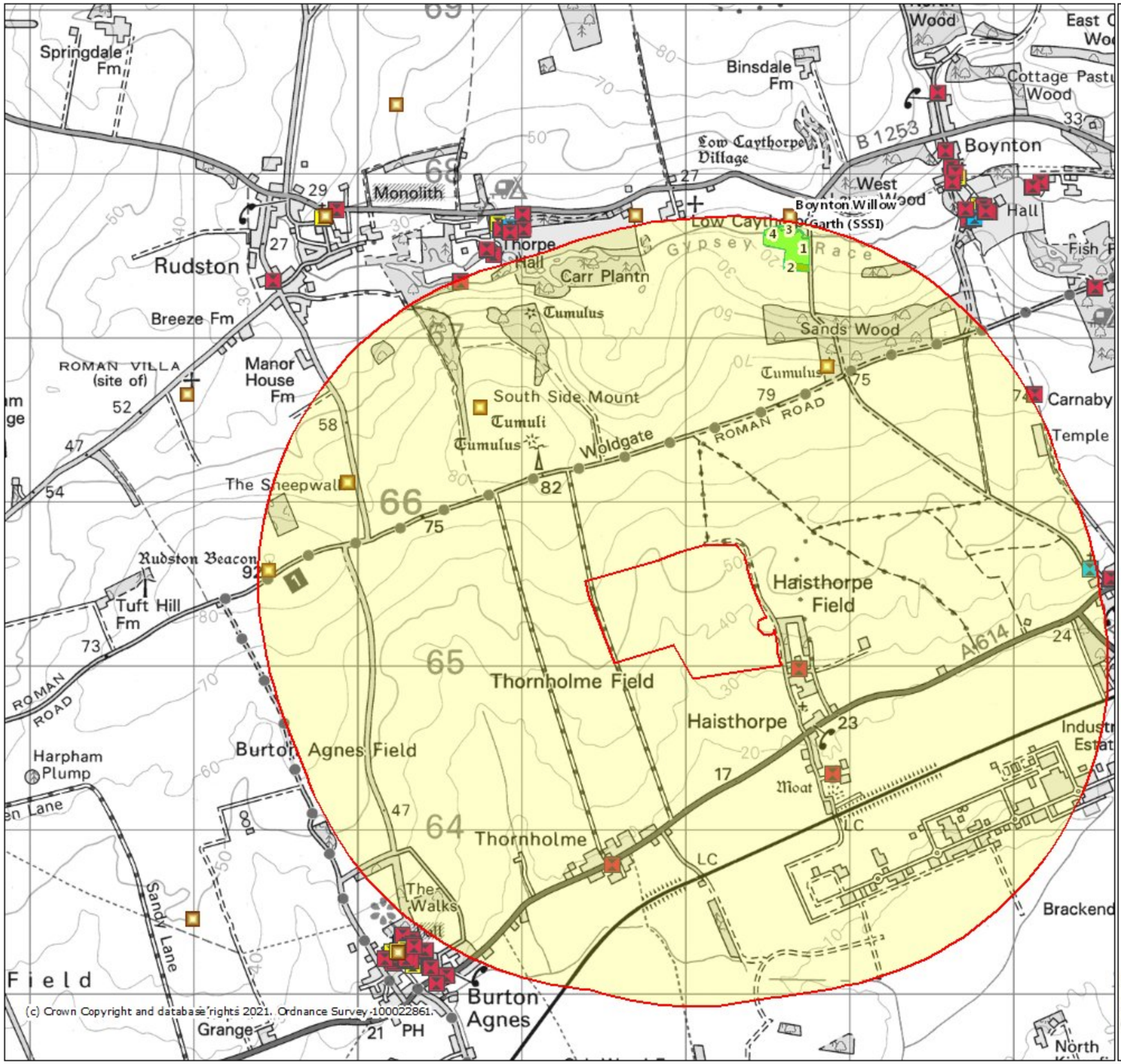
[vi] Written Statement, 25/3/2015, Secretary of State for Communities and Local Government. http://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2015-03-25/HCWS488/

[vii] East Riding Local Plan, adopted April 2016 https://www.eastriding.gov.uk/planning-permission-and-building-control/planning-policy-and-the-local-plan/

[viii] British Geological Survey Geology of Britain viewer. http://www.bgs.ac.uk/data/mapViewers/home.html?src=topNav

MAGiC

Magic Map



Legend

- Areas of Outstanding Natural Beauty (England)
- Local Nature Reserves (England)
- National Nature Reserves (England)
- National Parks (England)
- Ramsar Sites (England)
- Proposed Ramsar Sites (England)

Sites of Special Scientific Interest Units (England)

- Favourable Condition
- Unfavourable Recovering
- Unfavourable no change
- Unfavourable Declining
- Part Destroyed
- Destroyed
- Not Assessed

- Sites of Special Scientific Interest (England)
- Special Areas of Conservation (England)
- Possible Special Areas of Conservation (England)

Projection = OSGB36
xmin = 506800
ymin = 463000
xmax = 515700
ymax = 468600

0 0.5 1
km

THORNHOLME MAGIC SEARCH RESULTS – 2KM BUFFER

Site Check Report Report generated on Mon Jun 14 2021
You selected the location: Centroid Grid Ref: TA11986533
The following features have been found in your search area:

Sites of Special Scientific Interest Units (England) - points

Name
BOYNTON WILLOW GARTH
Reference
1040139
Site Unit Condition
FAVOURABLE
Citation
1012084
Hectares
3.74
Hyperlink
http://designatedsites.naturalengland.org.uk/UnitDetail.aspx?UnitId=1012084
Name
BOYNTON WILLOW GARTH
Reference
1040141
Site Unit Condition
FAVOURABLE
Citation
1017060
Hectares
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Name
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Reference
1040140
Site Unit Condition
UNFAVOURABLE RECOVERING
Citation
1017059
Hectares
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BOYNTON WILLOW GARTH
Reference
1040142
Site Unit Condition
FAVOURABLE
Citation
1017061
Hectares
0.25
Hyperlink
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Sites of Special Scientific Interest Units (England)

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Reference
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Site Unit Condition
FAVOURABLE
Citation
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Hectares
3.74

Hyperlink
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Name
Boynton Willow Garth SSSI
Reference
1003234
Natural England Contact
Mary Berry
Natural England Phone Number
0845 600 3078
Hectares
5.12
Citation
1001373
Hyperlink
http://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1001373
Sites of Special Scientific Interest (England)
Name
Boynton Willow Garth SSSI
Reference
1003234
Natural England Contact
Mary Berry
Natural England Phone Number
0845 600 3078
Hectares
5.12
Citation
1001373
Hyperlink

http://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1001373

Scheduled Monuments (England) - points

Name
Earthwork on the Sheepwalk stretching N from Wold Gate for 530yds (480m)
Scale of Capture
1:10000
Old Reference
ER 105
Reference
1005223
Easting
509938.896498
Northing
466117.898349
Date
Null
Area (Ha)
4.420281
Hyperlink
/Metadata_for_magic/rsm/rsmNoDataFound.html
Name
Rudston Beacon and round barrows to east
Scale of Capture
1:10000
Old Reference
ER 68
Reference
1005231
Easting
509456.1448
Northing
465581.9674
Date
Null
Area (Ha)
0.407964
Hyperlink
/Metadata_for_magic/rsm/rsmNoDataFound.html
Name
South Side Mount round barrow, 350m north west of Woldgate reservoir
Scale of Capture
1:2500
Old Reference
ER 69
Reference
1005232
Easting
510744.811784
Northing
466576.405518
Date
29/07/1960
Area (Ha)
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Name
Sands Wood round barrow
Scale of Capture
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Old Reference
30141
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1017994
Easting
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Northing

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Date
01/11/1967
Area (Ha)
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Scheduled Monuments (England)
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Settlement site at Boynton Hall
Scale of Capture
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1005207
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Area (Ha)
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Earthwork on the Sheepwalk stretching N from Wold Gate for 530yds (480m)
Scale of Capture
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Old Reference
ER 105
Reference
1005223
Easting
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Rudston Beacon and round barrows to east
Scale of Capture
1:10000
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ER 68
Reference
1005231
Easting
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Northing
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Date
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Area (Ha)
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South Side Mount round barrow, 350m north west of Woldgate reservoir
Scale of Capture
1:2500
Old Reference

ER 69
Reference
1005232
Easting
510744.811784
Northing
466576.405518
Date
29/07/1960
Area (Ha)
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Name
Low Caythorpe deserted medieval village, manorial complex and fishponds
Scale of Capture
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Old Reference
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Easting
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Date
14/01/1974
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Date
01/11/1967
Area (Ha)
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Listed Buildings (England)

Name
CHURCH OF ST JOHN THE BAPTIST
Reference
1083821
Grade
II*
Date Listed
30/06/1966
Legacy UID
167794
Scale of Capture
1:2500
Easting
514466
Northing
465591.3608
Hyperlink

https://historicengland.org.uk/listing/the-list/list-entry/1083821
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Reference
1204971
Grade
II
Date Listed
17/07/1987
Legacy UID
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Scale of Capture
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Easting
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Reference
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Grade
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Reference
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Grade
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https://historicengland.org.uk/listing/the-list/list-entry/1309594
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Legacy UID
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Scale of Capture
1:2500

Easting
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Areas of Outstanding Natural Beauty (England)
No Features found
Local Nature Reserves (England) - points
No Features found
Local Nature Reserves (England)
No Features found
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No Features found
National Nature Reserves (England)
No Features found
National Parks (England)
No Features found
Ramsar Sites (England) - points
No Features found
Ramsar Sites (England)
No Features found
Proposed Ramsar Sites (England) - points
No Features found
Proposed Ramsar Sites (England)
No Features found
Special Areas of Conservation (England) - points
No Features found
Special Areas of Conservation (England)
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Special Protection Areas (England) - points
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Registered Battlefields (England) - points
No Features found
Registered Battlefields (England)
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Registered Parks and Gardens (England) - points
No Features found
Registered Parks and Gardens (England)
No Features found
Green Belt (England)
No Features found