# Objection to Springwell Solar Farm EN010149

My name is Simon Mountjoy, and I am representing myself in this matter. I hold the distinction of being a Fellow of the British Institute of Agricultural Consultants, a Fellow of the Institute of Agricultural Management, and an Associate of the British Society of Soil Science.

This representation addresses four principal concerns: agricultural land classification, cropping, irrigation, and battery storage. My commentary specifically references Springwell West to illustrate these points, though they broadly apply to Springwell Central and East as well.

#### Agricultural Land Classification

Across the United Kingdom, there are 753 soil types as classified by the Agricultural Land Classification (ALC), graded from 1 to 5. On Springwell West, three main soil types predominate: Marcham and Elston 1, with a smaller area of Aswarby series to the south. These soils extend across most of Springwell Central and East, with the majority being classified as grade 2, which the applicant has acknowledged.

According to Map 1 (attached), which displays East Midlands soil types as per Natural England, the site at Springwell is shaded light blue, denoting "Very Good" land. The majority of the plan for East Midlands is green, indicating "Good to Moderate" land. It is evident that large areas suitable for such a site exist on poorer quality land, making the selection of Springwell, on high-quality soil, regrettable.

The applicant's Environmental Statement (ES 2.5.1) concedes that alternative sites were not explored due to their increased distance from the point of connection and a lack of willing landowners, even though no point of connection currently exists, as an application has yet to be submitted.

Map 2 (attached) overlays the soil types across the Springwell site, showing a predominance of the lighter coloured 343e Marcham soil type. This soil is described as shallow, well-drained calcareous coarse and fine loamy soils over limestone, with some deeper soils. It is suitable for a wide range of crops, including potatoes, sugar beet, and cereals, and is considered "Best and Most Versatile."

Elmston 1 shares similar characteristics, while the Aswarby series soils are generally slightly shallower over clay. Minor soils to the east are less productive, classified as grade 3a, but are still recognised as "Best and Most Versatile."

It is apparent that CLLP policy S 67 has not been met and has been disregarded, as has the aim set out in Green Futures: Our 25 Year Plan to Improve the Environment (para 1.1). This plan clearly states that local planning authorities should adhere to the aims of the NPPF and protect the best agricultural land, valuing soils as natural capital.

### Cropping

The land in question supports a diverse range of crops, including potatoes, sugar beet, spring malting barley (for which this is one of the most important areas nationally), vining peas, oilseed rape, and Lucerne. The versatility of grade 2 soils is demonstrated by this variety.

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Although described as droughty, there is little evidence of this limitation in practice. Early combining of spring barley on the better soils is approaching seasonal averages, and wheat yields are also satisfactory, despite dry conditions. Overall, yields exceed national averages. The successful cultivation of sugar beet and potatoes further attests to the land's high productive capacity. The absence of any applicant statements regarding deficient crop yields is itself indicative of the above-average productivity of these soils.

Even in challenging seasons, such as the wet autumn of 2023 and the historically wet spring of 2024, this land was drilled and cropped when lesser quality land, like the Trent valley and surrounding fens, remained uncropped due to waterlogging. The heath thus exemplifies "Best and Most Versatile" soils.

### rrigation

The application does not mention the availability of irrigation, particularly for Springwell West. Notably, the landowner received a substantial grant under the Rural Development Programme some 15 years ago to install water storage reservoirs and underground distribution mains. Such applications emphasise land quality, crop value enhancement, job creation, and environmental benefits.

The proposal for a large-scale solar farm over much of this area directly contradicts previous commitments.

The original grant application was likely based on potato production, as irrigation is widely recognised to improve productive capacity, effectively raising land by one grade—from grade 2 to grade 1 in this instance (MAFF ALC England and Wales 1988 p21)—with the help of public funds.

Living nearby, I have observed potatoes grown on all sides of my home on similar soil types to Springwell West. With access to water, yields and quality rival those achieved on Holbeach Marsh, where I am a director of a farming company operating some of the best grade 1 soils in the country.

The availability of irrigation is a significant factor, not always considered in soil classification. The existence of reservoirs and irrigation should not be overlooked, as they substantially enhance agricultural productivity. The applicant's own comments on Land Resource (2.1.2) note that the main limitation is soil droughtiness; however, it is telling that available irrigation is not mentioned.

#### **Battery Storage**

While much has been written about preserving wildlife such as bats and voles, there is a lack of detail concerning the safety and security of battery installations. In the event of fire or other environmental incidents, significant quantities of water would be required, with no clarity on its source or the feasibility of extinguishing such installations. Further, there is no clear plan for containing water or environmental contamination, or for preventing seepage.

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The Geology of Lincolnshire (1981, p. 107) describes the Lincolnshire heath and its soil types, noting that water is available at shallow depths across most of the county, with natural filtration provided by limestone and chalk. These geological features form long-term sources of pure water.

Siting large-scale battery technology on porous limestone, with insufficient plans for fire or explosion containment, is risky and could result in contamination that spreads widely and unpredictably—a situation that amounts to negligence.

#### Conclusions

- No consideration has been given to alternative sites, and Springwell is situated almost exclusively on land of the best and most versatile quality (approximately 88%), contrary to stated policies.
- Cropping is diverse and productive.
- Irrigation, although not discussed elsewhere, further enhances the capacity of the primary soil types.
- The geological suitability of the Lincolnshire heath for battery systems is questionable in the absence of clear control and containment protocols.

Taken together, these factors lead to the inevitable conclusion that the Springwell application runs counter to established guidelines and principles, and its promotion is, at best, misleading. Therefore, I urge that the application be refused, as its cost to the environment and the loss of food production outweigh any purported benefits to energy provision.



