

# Annex A

## NE18: Natural England Comments on Cumulative Impact Assessment of Soils and Agricultural Land

**Chapter Reviewed: Volume 6.0: Environmental Statement [EN010159] Volume 2: Aspect Chapters Chapter 18: Cumulative Effects**

### **Cumulative impact assessment**

Whilst we are unable to recommend a particular methodology for cumulative impact assessment, there is external guidance available that might be helpful when you are considering the cumulative impact of the loss of best and most versatile agricultural land as part of the DCO submission:

1. The Institute of Environmental Management and Assessment (IEMA) have recently released guidance on Land and Soils. The guidance is aimed at Environmental Impact Assessment (EIA) of projects
2. The IEMA guidance also refers to The Design Manual for Roads and Bridges (DMRB) (2019) LA109 Geology and Soils EIA Guidance which might also be a useful resource. The guidance sets out the assessment criteria and methodology for highway projects only, though parts of the DMRB guidance are sometimes applied to other project types.
3. The [Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment](#) guidance sets out a staged, good-practice approach for assessing the combined environmental impacts of Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008, helping applicants identify, evaluate and mitigate the cumulative effects of their proposals alongside other existing or approved developments. It is non-statutory advice produced by the Planning Inspectorate to complement primary legislation, regulations and sector-specific policy, and is designed to ensure that Environmental Statements present transparent, proportionate and repeatable cumulative effects assessments that inform decision makers and interested parties throughout the NSIP consenting process.

**Table 18.2** The Agricultural Land Classification (ALC) system is a nationally standardised framework used to assess the quality and versatility of agricultural land across England. As such, the significance of any proposed development affecting ALC graded land should be evaluated not only in the local planning context but also in terms of its national implications, particularly when it involves the loss of Best and Most Versatile (BMV) soils Grades 1, 2, and Subgrade 3a.

**18.3.19** Natural England are broadly satisfied with the regional Zol and the information provided within ES Volume 3, Figures 18.1 to 18.8 [EN010159/APP/6.20] for a regional cumulative assessment, however we refer the applicant back to the comment above (table 18.2)

**18.5.6** The figures presented are marginally different to those that are presented in the ALC Statistical breakdown for England by region, county and district that are based on area measurements from the digital 1:250,000 scale Provisional ALC map which is available to view and download from the [www.magic.gov.uk](http://www.magic.gov.uk) website. For Lincolnshire assuming an even split between 3a and 3b I calculate potential BMV to be 69.45% and Nottinghamshire, respectively,

50.5%. However, despite these marginal differences Natural England accept the assertion that regionally these are both higher than the national average with Lincolnshire representing a 'significant' exceedance.

**18.5.7** Cite source.

**18.5.8** Again marginally different to figures I have Lincolnshire = 410,630.5ha and Nottinghamshire = 105,281ha (assuming even split between 3a and 3b) \*Nottinghamshire figure is close enough for me.

**Table 18.4** NB indication of BESS etc considered temporary, after discussion with WG and considering the lack of robust evidence to suggest that Best and Most Versatile (BMV) soils Grades 1, 2, and 3a under the Agricultural Land Classification can be stored for such long operational periods and still be successfully reinstated with full restoration of their original functions. NEs advice needs to be reconsidered on this.

**Chapter Reviewed: Volume 6.0 Environmental Statement [EN010159] Volume 3: Technical Appendices Supporting ES Volume 2 Appendix 18.3 Summary of Other Developments included within the Cumulative BMV Assessment February 2025 Document Reference: EN010159/APP/6.21**

#### **General comment**

The acronym N/S (Not Surveyed) does not appear anywhere in the table. In the absence of this designation, it is presumed that all listed sites have been surveyed. If any sites remain unsurveyed, this should be clearly indicated to avoid misinterpretation.

Despite providing regional estimates of Best and Most Versatile (BMV) land within Lincolnshire and Nottinghamshire, no cumulative assessment has been undertaken to reflect the combined impacts set out in Table 1 of Appendix 18.2. As a result, the total extent of high-quality agricultural land loss across both counties remains unquantified, preventing a coherent evaluation of landscape-scale pressures. This omission undermines the transparency and proportionality central to a robust cumulative effects assessment, leaving decision-makers without the full picture needed to determine.

Natural England believe the figure presented in table 2 appendix 18.2 provide the basis for these calculation however this date need to be related back to both the regional and national potential BMV figures presented (para 18.5.6)