

Date: 17 March 2026

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BY EMAIL ONLY

Dear Matthew,

Natural England specialists provide the following technical input and comments following a detailed review of the 'BMV Avoidance: Micro-siting Analysis' technical note, provided in your email dated 11/02/2026.

Response to micro-siting document (JAH - March 2026)

This Micro-siting Analysis provides a comprehensive and well-structured review of how the Great North Road Solar and Biodiversity Park has sought to minimise its interaction with Best and Most Versatile (BMV) agricultural land in accordance with national policy, including NPS EN-1, NPS EN-3, and guidance from Natural England. The consultant's work clearly demonstrates a thoughtful and iterative design process, supported by detailed Agricultural Land Classification (ALC) surveys and a robust understanding of the operational constraints of the scheme.

The document effectively outlines how BMV land was considered from the earliest stages of site selection through to detailed micro-siting of substations, tracks, construction compounds, and biodiversity enhancements. The evidence shows that the project has avoided higher-grade land where practicable particularly Grades 1 and 2 and has justified its use of Grade 3a land with reference to local prevalence of BMV soils, engineering feasibility, landscape integration, and grid connectivity requirements.

Importantly, the consultant provides clear rationale for the limited permanent loss of BMV land (4.5 ha), and the temporary disturbance associated with infrastructure and construction compounds. The commitment to restore temporary works areas to a comparable ALC grade, combined with good-practice soil management, further strengthens the credibility of the approach.

However, while the analysis is thorough and the consultant is to be commended for the clarity and depth of their assessments, the proposed woodland planting does raise notable concerns regarding long-term impacts on agricultural land quality. Although the locations chosen reflect clear ecological logic such as habitat connectivity, buffering, and landscape enhancement, the establishment of woodland on BMV land is likely to result in permanent loss of agricultural capability. Unlike solar infrastructure, which is reversible, woodland creation typically represents a permanent land use change, making restoration to equivalent ALC grade impractical at decommissioning.

The document acknowledges that 22.4 ha of the proposed planting occurs on BMV land. While these areas offer biodiversity benefits, their inclusion may require additional justification to demonstrate:

- why alternative, lower-quality land cannot accommodate these features;
- how the permanent loss of productive BMV land has been balanced against ecological and landscape priorities; and
- how the approach aligns with national policy, which expects BMV land to be avoided unless no reasonable alternative exists.

In summary, The Micro-siting Analysis sets out a detailed and well-reasoned assessment of how the project has sought to minimise the use of Best and Most Versatile (BMV) agricultural land across the Great North Road Solar and Biodiversity Park. The consultant's work is thorough, clearly demonstrating how BMV considerations influenced both site selection and micro-siting of infrastructure, with higher-grade land avoided where practicable and unavoidable use carefully justified. Temporary impacts from tracks, compounds, and solar infrastructure are designed to be reversible, supported by good-practice soil management and a commitment to restoring land to a comparable ALC grade at decommissioning.

While the report makes a strong case for the overall minimisation of BMV impacts, woodland planting presents a notable exception. Unlike solar arrays and temporary construction areas, woodland creation constitutes a **permanent** land-use change, meaning that areas planted on BMV land will not be capable of later restoration to their previous agricultural grade. Although ecological connectivity and landscape benefits are clear, the reliance on BMV land for several planting areas may require further justification to align with policy expectations around avoiding irreversible impacts on high-quality soils. **Natural England therefore consider that the 22.4ha of woodland planting should be considered as a permanent loss in the ES and subsequently considered by the SoS in their decision making.**

Yours Sincerely

Megan Bromiley
Higher Officer – Sustainable Development
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