

**The Great Grid Upgrade**

Sea Link

# Sea Link

## Volume 6: Environmental Statement

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Chapter 6  
Agricultural and Soils

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# Contents

<b>6.</b>	<b>Agriculture and Soils</b>	<b>1</b>
<b>6.1</b>	Introduction	1
<b>6.2</b>	Regulatory and Planning Context	2
<b>6.3</b>	Scoping Opinion and Consultation	8
<b>6.4</b>	Approach and Methodology	16
<b>6.5</b>	Basis of Assessment	24
<b>6.6</b>	Study Area	27
<b>6.7</b>	Baseline Conditions	27
<b>6.8</b>	Proposed Project Design and Embedded Mitigation	31
<b>6.9</b>	Assessment of Impacts and Likely Significant Effects	34
<b>6.10</b>	Additional Mitigation	38
<b>6.11</b>	Residual Effects and Conclusions	38
<b>6.12</b>	Sensitivity Testing	42
<b>6.13</b>	References	43

## Table of Tables

Table 6.1 NPS EN-1 requirements relevant to agriculture and soils	2
Table 6.2 NPS EN-5 requirements relevant to agriculture and soils	4
Table 6.3 NPPF requirements relevant to agriculture and soils	6
Table 6.4 Local planning policies relevant to agriculture and soils – Suffolk Coastal Local Plan	7
Table 6.5 Comments raised in the Scoping Opinion	9
Table 6.6 Key topics raised during consultation	13
Table 6.7 Guidance on sensitivity of soil resources in relation to soil functions	20
Table 6.8 Determination of sensitivity criteria in relation to soil handling and soil structural resilience	22
Table 6.9 Determination of magnitude criteria for impact on agricultural land and soils	23
Table 6.10 Flexibility assumptions	25
Table 6.11 Provisional agricultural land by area (ha) across the Proposed Project	29
Table 6.12 Predictive agricultural land by area (ha) across the Proposed Project	30
Table 6.13 Predictive ALC grades (ha) affected by the temporary and permanent design features of the Proposed Project	35
Table 6.14 Summary of residual agriculture and soil effects (Construction)	39
Table 6.15 Summary of residual agriculture and soil effects (Operation and Maintenance)	40
Table 6.16 Summary of residual agriculture and soil effects (Decommissioning)	40

## Version History

<u>Date</u>	<u>Issue</u>	<u>Status</u>	<u>Description / Changes</u>
<u>March 2025</u>	<u>A</u>	<u>Final</u>	<u>For DCO submission</u>
<u>October 2025</u>	<u>B</u>	<u>Final</u>	<u>Update following Rule 6 Errata List</u>



# 6. Agriculture and Soils

## 6.1 Introduction

- 6.1.1 This chapter of the Environmental Statement (ES) presents the assessment of the likely significant agriculture and soils effects that could result from the Proposed Project (as described in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**) specifically the Suffolk Onshore Scheme.
- 6.1.2 The Order Limits, which illustrate the boundary of the Proposed Project, are illustrated on **Application Document 2.2.1 Overall Location Plan** and the Suffolk Onshore Scheme Boundary is illustrated on **Application Document 2.2.2 Suffolk Location Plan**.
- 6.1.3 This chapter should be read in conjunction with the following ES chapters:
- **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered;**
  - **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project;**
  - **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology;**
  - **Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA Consultation;**
  - **Application Document 6.2.2.3 Part 2 Suffolk Chapter 2 Ecology and Biodiversity;**
  - **Application Document 6.2.2.5 Part 2 Suffolk Chapter 4 Water Environment;**
  - **Application Document 6.2.2.6 Part 2 Suffolk Chapter 5 Geology and Hydrogeology; and**
  - **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing.**
- 6.1.4 This chapter is supported by the following figures:
- **Application Document 6.4.2.6 Agriculture and Soils.**
- 6.1.5 This chapter is supported by the following appendices:
- **Application Document 6.3.2.6.A Appendix 2.6.A Predictive Agricultural Land Classification Report – Suffolk.**
- 6.1.6 This chapter is supported by the following application documents:
- **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan (CEMP);**
  - **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice;**

- Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC); and
- Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk.

## 6.2 Regulatory and Planning Context

- 6.2.1
- This section sets out the legislation and planning policy that is relevant to the agriculture and soil effects assessment. A full review of compliance with relevant national and local planning policy is provided within the **Application Document 7.1 Planning Statement** submitted as part of the application for Development Consent.
- 6.2.2
- Policy generally seeks to minimise agriculture and soils effects from development and to avoid significant adverse effects. This applies particularly to the protection of best and most versatile (BMV) land, defined as comprising Grades 1, 2, and 3a agricultural land, and soil ecosystem services.

### Legislation

- 6.2.3
- Although the Proposed Project will be tested in line with National Policy, as examined below, the assessment has also been undertaken in accordance with, and in reference to, the following national legislation and policy:
  - The Agricultural Land (Removal of Surface Soil) Act 1953; and
  - Environmental Improvement Plan (Department for Environment, Food and Rural Affairs, 2023).

## National Policy

### National Policy Statements

- 6.2.4
- National Policy Statements (NPS) set out the primary policy tests against which the application for a Development Consent Order (DCO) for the Proposed Project will be considered. [Table 6.1](#)~~Table 6.1~~ and [Table 6.2](#)~~Table 6.2~~ below provides details of the elements of NPS for Energy (EN-1) (Department of Energy and Net Zero, 2023) and NPS for Electricity Networks Infrastructure (EN-5) (Department of Energy and Net Zero, 2023) that are relevant to this chapter. NPS EN-3 Renewable Energy Infrastructure has relevance to the Proposed Project, but only in respect of the offshore elements. As such it has no relevance to the assessment presented in this chapter.

**Table 6.1 NPS EN-1 requirements relevant to agriculture and soils**

NPS EN-1 section	Where this is covered in the ES
Part 5.11.12 “ <i>Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).</i> ”	The extent of BMV land (based on predictive mapping) within the Order Limits is reported in <a href="#">Table 6.12</a> <del>Table 6.12</del> . An assessment of the likely impacts on BMV land is presented in Section 6.9, and mitigation measures have been set out to minimise the effects. The overall extent of land required has been

NPS EN-1 section	Where this is covered in the ES
	<p>minimised through the evolution of the design of the Proposed Project. The presence of Provisionally graded BMV formed part of the initial siting assessment as detailed in <b>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered</b>. Provisional BMV land was a consideration in the converter station siting; and whilst the chosen site option was found to have higher value Provisional ALC graded land, other environmental and technical constraints are noted as part of the final siting decision (<b>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered</b>).</p>
<p>Part 5.11.13 <i>“Applicants should also identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed.”</i></p>	<p>The mitigation measures include the requirement for a Soil Management Plan (SMP) in line with published guidance. An Outline SMP (oSMP) (<b>Application Document 7.5.10.1 Outline SMP - Suffolk</b>) has been included in the application for development consent alongside this ES. An assessment of residual impacts and likely effects on soils and their functions, taking account of proposed mitigation measures, is set out in Section 6.9.</p>
<p>Part 5.11.14 <i>“Applicants are encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination.”</i></p>	<p>The mitigation measures include the requirement for a SMP in line with published guidance. An oSMP has been included in the application for development consent alongside this ES. The oSMP (<b>Application Document 7.5.10.1 Outline SMP – Suffolk</b>) will be updated pre-construction, in line with all project requirements, such as habitat designs detailed in the (outline) Landscape and Ecological Mitigation Plans ((o)LEMP) (<b>Application Document 7.5.7.1 Outline Landscape and Ecological management Plan – Suffolk</b>), outlining sustainable management measures to ensure adequate volumes of material for restoration, as well as minimising any surplus soil materials. The final SMP will set out details of disposal routes should there be a surplus of soil materials. Land required temporarily is committed to being returned to its pre-construction condition as referenced in Code of Construction Practice item GG07 (<b>Application Document 7.5.3.1 CEMP</b>)</p>

NPS EN-1 section	Where this is covered in the ES
	<b>Appendix A Outline Code of Construction Practice).</b>
Part 5.11.34 <i>“The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.”</i>	The extent of BMV land (based on predictive mapping) within the Order Limits is reported in <a href="#">Table 6.12</a> <del>Table 6.12</del> . An assessment of the likely impacts on BMV land is presented in Section 6.9, and mitigation measures have been set out to minimise the effects. The overall extent of land required has been minimised through the evolution of the design of the Proposed Project. The presence of Provisionally graded BMV land formed part of the initial siting assessment as detailed in <b>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered</b> . Whilst Provisional BMV was a consideration in the converter station siting, other environmental and technical constraints are also noted as part of the final siting decision ( <b>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered</b> ).

**Table 6.2 NPS EN-5 requirements relevant to agriculture and soils**

NPS EN-5 section	Where this is covered in the ES
Part 2.9.25 <i>“In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable. In this context it should consider:</i> <ul style="list-style-type: none"> <li><i>• the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along</i></li> </ul>	<p>The Proposed Project incorporates undergrounding for the majority of the route. The potential effects of undergrounding the cables, or opportunities for trenchless techniques to be utilised, have been assessed as part of this ES, and the considerations of options such as trenchless options and overhead lines are assessed in <b>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered</b>. A consideration of location in combination with an assessment of the required infrastructure and construction needs were all accounted for in weighing-up alternative options (<b>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered</b>).</p> <p>An assessment of the likely impacts is presented in Section 6.9 accounting for mitigation measures to minimise the effects.</p>



NPS EN-5 section	Where this is covered in the ES
<p><i>the length of the route, and so such works will often be disruptive – albeit temporarily – to the receptors listed above than would an overhead line of equivalent rating);[...]</i></p> <ul style="list-style-type: none"> <li><i>• the applicant’s commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land, including development and implementation of a Soil Resources and Management Plan. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites.”</i></li> </ul>	<p>Embedded mitigation measures are detailed in Section 6.8, these measures include a commitment to returning land used temporarily to its original ALC grade.</p> <p>Land required temporarily is committed to being returned to its pre-construction condition as referenced in Code of Construction Practice item GG07 (<b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b>).</p>
<p>Part 2.9.58 “<i>There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences.</i>”</p>	<p>An EMF compliance report is being submitted with the application (<b>Application Document 6.5 Electric and Magnetic Field Compliance Report</b>). However, as set out in the Scoping Report (<b>Application Document 6.14 Environmental Scoping Report 2022</b>) and agreed by the Planning Inspectorate, the potential effects of EMFs on land use during operation has been scoped out of the assessment. The Proposed Project includes design considerations such as providing clearance of the conductors if any sensitive land uses (such as horse grazing and riding schools) are present.</p>

## National Planning Policy Framework

- 6.2.5 The National Planning Policy Framework (NPPF) as revised in December 2024 (Ministry of Housing, Communities, and Local Government, 2024) sets out national planning policies that reflect priorities of the Government for operation of the planning system and the economic, social, and environmental aspects of the development and use of land. The NPPF has a strong emphasis on sustainable development, with a presumption in favour of such development. The NPPF has the potential to be considered important and relevant to the Secretary of State’s (SoS) consideration of the Proposed Project.

6.2.6 [Table 6.3](#) below provides details of the elements of the NPPF that are relevant to this chapter, and how and where they are covered in the ES.

**Table 6.3 NPPF requirements relevant to agriculture and soils**

NPPF section	Where this is covered in the ES
<p>Paragraph 187 <i>“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 best and most versatile agricultural land, and of trees and woodland [...]”.</i></p>	<p>The overall extent of land required by the Proposed Project has been minimised through the evolution of the design. The extent of BMV land within the Order Limits is reported in <a href="#">Table 6.12</a>. An assessment of likely impacts on BMV land is presented in Section 6.9 and has been assessed in line with the proposed mitigation measures (aligned to published guidance and set out to minimise the effects).</p>
<p>Paragraph 188 <i>“Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework<sup>65</sup>; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.”</i></p>	<p>Whilst this policy primarily concerns local plan making it is directly linked to Footnote 65 which specifically deals with agricultural land quality, as such we have retained the reference.</p> <p>The overall extent of land required by the Proposed Project has been minimised through the evolution of the design. The extent of BMV land within the Order Limits is reported in <a href="#">Table 6.12</a>. An assessment of likely impacts on BMV land is presented in Section 6.9 and has been assessed in line with the proposed mitigation measures (aligned to published guidance and set out to minimise the effects).</p>
<p>Paragraph 188 Footnote 65 <i>“Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.”</i></p>	<p>The overall extent of land required by the Proposed Project has been minimised through the evolution of the design. The presence of Provisionally graded BMV formed part of the initial siting assessment as detailed in <b>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered</b>. Whilst Provisional BMV land was a consideration in the converter station siting, other environmental and technical constraints are also noted as part of the final siting decision (<b>Application Document 6.2.1.3 Part 1</b></p>

NPPF section	Where this is covered in the ES
	<p><b>Introduction Chapter 3 Main Alternatives Considered).</b></p> <p>The extent of BMV land within the Order Limits is reported in <a href="#">Table 6.12</a><del>Table 6.12</del>. An assessment of likely impacts on BMV land is presented in Section 6.9 and has been assessed in line with the proposed mitigation measures (aligned to published guidance and set out to minimise the effects).</p>

## National Planning Practice Guidance

- 6.2.7 National Planning Practice Guidance on the Natural Environment ( (Ministry of Housing, Communities and Local Government; Department for Leveling Up, Housing and Communities, 2025)) provides information on the ALC system and on how planning can safeguard soils with specific reference to protecting soils in construction projects, including where soil resources are being directly affected.

## Local Planning Policy

- 6.2.8 The Suffolk Onshore Scheme (refer to **Application Document 2.2.2 Suffolk Location Plan**) lies within the jurisdiction of Suffolk County Council at a county level, and East Suffolk Council at a district level.
- 6.2.9 County planning guidance which is relevant to a study of agriculture and soil and has informed the assessment of preliminary effects in this chapter is as follows:
- Suffolk's Nature Strategy (Suffolk County Council, 2015): this recommends that the contribution from agri-environment schemes is maximised towards the multiple benefits of ecological restoration at a landscape scale.

## Local Plans

- 6.2.10 The Suffolk Onshore Scheme (refer to **Application Document 2.2.2 Suffolk Location Plan**) lies within the jurisdiction of East Suffolk Council at a district level. Local planning policy for East Suffolk Council consists of two parts: the Suffolk Coastal Local Plan (East Suffolk Council, 2020). and the Waveney Local Plan (East Suffolk Council, 2019).
- 6.2.11 The Suffolk Onshore Scheme lies within the boundary of the Suffolk Coastal Local Plan (adopted September 2020) (East Suffolk Council, 2020). Local Plan policies that are relevant to agriculture and soils assessment matters, and have informed the agriculture and soils assessment, are detailed in [Table 6.4](#)~~Table 6.4~~ .

**Table 6.4 Local planning policies relevant to agriculture and soils – Suffolk Coastal Local Plan**

Suffolk Coastal Local Plan - Policy	Where this is covered in the ES
<p><b>SCLP10.1: Biodiversity and Geodiversity</b>  <i>Development will be supported where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity through the creation of new habitats and green infrastructure and improvement to linkages between habitats, such as wildlife corridors and habitat ‘stepping stones’. All development should follow a hierarchy of seeking firstly to avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, or as a last resort compensate for losses that cannot be avoided or mitigated for. Adherence to the hierarchy should be demonstrated.</i></p>	<p>This policy primarily refers to biodiversity and associated green infrastructure; whilst it does not explicitly refer to soils it has been retained given the importance of soils and soil health for biodiversity.</p> <p>The mitigation measures include the submission of an oSMP in line with published guidance, which will support the appropriate reinstatement of soils, or their re-use where they are affected by permanent infrastructure to ensure they can continue to contribute positively to biodiversity and geodiversity.</p>
<p><b>SCLP10.3: Environmental Quality</b>  <b>Development</b> <i>Proposals will be expected to protect the quality of the environment and to minimise and, where possible, reduce all forms of pollution and contamination. Development proposals will be considered in relation to impacts on; [...]</i></p> <p><i>b) Soils and the loss of agricultural land;</i></p>	<p>The overall extent of land required by the Proposed Project has been minimised through the evolution of the design. The extent of BMV land within the Order Limits is reported in <a href="#">Table 6.12</a><del>Table 6.12</del>. An assessment of the likely impacts on BMV land is presented in Section 6.9 and has been fully assessed accounting for mitigation measures aligned to published guidance (set out to minimise the effects). The mitigation measures include the submission of an oSMP in line with published guidance.</p>
<p><b>SCLP10.4 Landscape Character</b>  <b>Development</b> <i>proposals will be expected to demonstrate their location, scale, form, design and materials will protect and enhance:</i></p> <p><i>a) The special qualities and features of the area;</i></p> <p><i>b) The visual relationship and environment around settlements and their landscape settings;</i></p> <p><i>c) Distinctive landscape elements including but not limited to watercourses, commons, woodland trees, hedgerows and field boundaries, and their function as ecological corridors;</i></p> <p><i>d) Visually sensitive skylines, seascapes, river valleys and significant views towards key landscapes and cultural features; and</i></p>	<p>This policy refers primarily to green infrastructure, biodiversity and landscape; it has been included as agricultural land, and how this influences land use, is a key component of rural landscapes.</p> <p>The extent of BMV land within the Order Limits is reported in <a href="#">Table 6.12</a><del>Table 6.12</del>. An assessment of the likely impacts on BMV land is presented in Section 6.9 and has been fully assessed accounting for mitigation measures aligned to published guidance (set out to minimise the effects). The mitigation measures include the submission of an oSMP in line with published guidance, which will support the</p>

Suffolk Coastal Local Plan - Policy	Where this is covered in the ES
e) <i>The growing network of green infrastructure supporting health, wellbeing and social interaction.</i>	development of the required landscape mitigation.

## 6.3 Scoping Opinion and Consultation

### Scoping

- 6.3.1 A Scoping Report for the Proposed Project was issued to the Planning Inspectorate (PINS) on 24 October 2022 (**Application Document 6.14 Environmental Scoping Report 2022**) and a Scoping Opinion was received from the SoS on 1 December 2022 (**Application Document 6.15 Scoping Opinion 2022**) . ~~Table 6.5~~[Table 6.5](#) sets out the comments raised in the Scoping Opinion and how these have been addressed in this ES. The Scoping Opinion takes account of responses from prescribed consultees as appropriate. **Application Document 6.3.1.6.A Appendix 1.6.A Responses to Scoping Opinion** provides responses to the comments made by the prescribed consultees at the scoping stage and how each comment has been considered.

**Table 6.5 Comments raised in the Scoping Opinion**

ID	Inspectorate's comments	Response
3.6.1	<p><i>Temporary removal of land from agricultural production - construction, maintenance and decommissioning</i></p> <p>The Applicant proposes to scope out the temporary removal of land from agricultural production on the basis that all land required temporarily would be reinstated, the footprint of the permanent infrastructure is limited and impacts on agricultural operations will be dealt with through compensation agreements which lie outside of the ES process. The Inspectorate considers that effects of temporary removal may be scoped out from further assessment; however, the ES should provide an estimate of the quantity of Best and Most Versatile (BMV) land to be affected by the temporary works, the duration of such works and any long-term changes in land use introduced by associated easements.</p>	<p>It is noted that effects of temporary removal of land from agricultural production are scoped out. An estimate of the extent of BMV land affected by temporary works is included in this chapter in <del>Table 6.13</del><a href="#">Table 6.13</a>. Details of the duration of works are set out in <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b>. Changes to land use as a result of easements are not anticipated, as they will not restrict agricultural use. Embedded mitigation measures are detailed in Section 6.8; these measures include a commitment to returning land used temporarily to its original ALC grade.</p>
3.6.2	<p><i>Permanent removal of land from agricultural production – operation</i></p> <p>The Applicant proposes to scope out the permanent removal of land from</p>	<p>It is noted that impacts resulting from the permanent removal of land from agricultural production can be scoped out.</p>



ID	Inspectorate's comments	Response
	<p>agricultural production on the basis that all land required temporarily would be reinstated, the footprint of the permanent infrastructure is limited and impacts on agricultural operations would be dealt with through compensation agreements which lie outside of the ES process. The Inspectorate agrees this matter can be scoped out on the basis the ES confirms the amount of agricultural land to be permanently lost and explains why this is considered 'limited' and not likely to lead to significant effects. Reinstatement of land, and the proposed soil management and handling measures, should be clearly described in the ES and secured through the DCO.</p>	<p>The permanent loss of land (11.47 ha) from agricultural businesses equates to a very small percentage of the total utilised agricultural area (8.7 million hectares) in England (&lt;0.00014%) or in the East of England (1.4 million hectares; &lt;0.0002%) (Department for Environment, Food and Rural Affairs, 2024 (a)) (Department for Environment, Food and Rural Affairs, 2024 (b)). This is considered to be a limited loss of agricultural land. The impact on individual agricultural businesses would be mitigated through compensation agreements, which lie outwith the scope of the EIA. Further detail on the extent of permanent agricultural land take is detailed in Section 6.9. Land required temporarily is committed to being returned to its pre-construction condition as referenced in Code of Construction Practice item GG07 (<b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b>) and Schedule 3 Requirement 9 of the draft DCO (<b>Application Document 3.1</b>).</p>
3.6.3	<p><i>Temporary disruption and disturbance to agricultural operations (from noise, fragmentation and disruption to water supplies and land drainage) - construction, maintenance and decommissioning</i></p> <p>The Applicant proposes to scope out these matters on the basis that they will be managed through mitigation measures set out within the outline Code of Construction Practice (CoCP), all land required temporarily would be reinstated and impacts on agricultural operations would be dealt with through compensation agreements which lie outside of the ES process. The Inspectorate agrees to scope out this matter on this basis.</p>	<p>It is noted that these matters are scoped out. Embedded mitigation measures are detailed in Section 6.8; these measures include a commitment to returning land used temporarily to its original ALC grade (CoCP item GG07 <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b>).</p>

ID	Inspectorate's comments	Response
3.6.4	<p><i>Effects of Electromagnetic Fields (EMFs) on land use – operation</i></p> <p>The Applicant proposes to scope out the effects of EMFs on land use during operation of the Proposed Development on the basis that there is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences.</p> <p>The Applicant proposes to undertake a walkover survey of the indicative alignment to identify land use and activities that may require additional clearance of the conductors. The Applicant will also provide the relevant information on EMFs in a separate document submitted as part of the application for development consent which will demonstrate compliance in accordance with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines and paragraph 2.10.9 of EN5. On this basis, the Inspectorate agrees to scope out operational effects from EMFs on land use.</p>	<p>An EMF compliance report is being submitted with the application (<b>Application Document 6.5 Electric and Magnetic Field Compliance Report</b>). It is noted, however, that EMF impacts on land use during operation are scoped out.</p>
3.6.5	<p><i>Economic effects on landowners – construction, operation, maintenance, and decommissioning</i></p> <p>Paragraph 2.7.6.12 of the Scoping Report proposes to scope out economic effects on individual landowners and farmers on the basis that most of the land will be reinstated by the end of the construction phase and any claims regarding compensation will be addressed outside of the EIA process. The Inspectorate agrees that significant effects are unlikely and is therefore content that this matter can be scoped out of further assessment.</p>	<p>It is noted that the economic effects on landowners are scoped out.</p>
3.6.6	<p><i>Temporary loss of BMV land and temporary disturbance to soils and associated ecosystem services – construction, maintenance, and decommissioning.</i></p> <p>Paragraph 2.7.6.6 of the Scoping Report states that until soil surveys have been undertaken to understand sensitivity of</p>	<p>An assessment of the soils and their sensitivity to handling, storage and reinstatement is presented in Section 6.9, and was found to be non-significant. This assessment has been based on available desk-study information and the results from predictive ALC mapping rather</p>

ID	Inspectorate's comments	Response
	<p>soils to handling, storage and reinstatement, construction effects on soils and Agricultural Land Classification (ALC) will be scoped into the ES. The ES should include the necessary information to demonstrate impacts can be avoided or reduced to exclude significant effects or provide an assessment where likely significant effects could occur.</p>	<p>than soil surveys, an approach that has been discussed with Natural England. Whilst Natural England support the inclusion of the predictive mapping they highlight that this provides an indication of the ALC grade and does not provide the information required to inform the development of a SMP. As set out in Section 6.8 ALC and soil surveys will be completed pre-construction to ensure site-specific survey data is available for the SMP.</p> <p>Further detail on the Predictive Modelling approach can be found in paragraphs 6.4.6 – 6.4.9 of this chapter, and in <b>Application Document 6.3.2.6.A Appendix 2.6.A Predictive Agricultural Land Classification Report – Suffolk</b>.</p>
3.6.7	<p><i>Permanent loss of BMV land and permanent disturbance to soils and associated ecosystem services – operation</i></p> <p>Paragraph 2.7.6.7 of the Scoping Report states that the land grades and soil types affected would be confirmed through the assessment process and as such, permanent impacts on soils and ALC system will initially be scoped into the assessment. It is further stated that if the site survey confirms that the permanent land affected is not BMV land or that the cumulative loss is below the magnitude threshold for a likely significant effect, then permanent loss of agricultural land during operation would be scoped out of the ES. The Inspectorate is satisfied with this approach.</p>	<p>An assessment of the soils and their sensitivity and loss of BMV land is presented in Section 6.9. This assessment has been based on available desk-study information and the results from predictive ALC mapping rather than soil surveys, an approach that has been discussed with Natural England. Whilst Natural England support the inclusion of the predictive mapping they highlight that this provides an indication of the ALC grade and does not provide the information required to inform the development of a SMP. As set out in Section 6.8 ALC and soil surveys will be completed pre-construction to ensure site-specific survey data is available for the SMP.</p> <p>Further detail on the Predictive Modelling approach can be found in paragraphs 6.4.6 – 6.4.9 of this chapter, and in <b>Application Document 6.3.2.6.A Appendix 2.6.A Predictive Agricultural Land Classification Report – Suffolk</b>.</p>

ID	Inspectorate's comments	Response
3.6.8	<p><i>Temporary loss of BMV land and temporary disturbance to soils and associated ecosystem services – maintenance</i></p> <p>Paragraph 2.7.6.8 of the Scoping Report states that any maintenance or repair works required which would result in disturbance to soils during operation of the project would be undertaken in accordance with good practice soil handling methods. It's further stated that no likely significant effects on soils or ALC during operational maintenance or repair activities are therefore concluded and this aspect is scoped out of the ES. This is in contradiction to the information contained within Table 2.7.1, which proposes to scope in the temporary loss of BMV land and temporary disturbance to soils and associated ecosystem services from maintenance activities (to be reviewed once soil surveys are complete). The ES should clearly define the scope for the aspect and the Inspectorate considers that an assessment of the effects arising from the temporary loss of BMV land and temporary disturbance to soils and associated ecosystem services should be included within the ES, where significant effects are likely to occur.</p>	<p>An assessment of the soils and their sensitivity to disturbance during maintenance and the presence of BMV land is presented in Section 6.9. This aspect has been reviewed further and it is still considered that no significant effects will result from the Proposed Project during operation and maintenance. This assessment has been based on available desk-study information and the results from predictive ALC mapping rather than soil surveys, an approach that has been discussed with Natural England. Whilst Natural England support the inclusion of the predictive mapping they highlight that this provides an indication of the ALC grade and does not provide the information required to inform the development of a SMP. As set out in Section 6.8 ALC and soil surveys will be completed pre-construction to ensure site-specific survey data is available for the SMP.</p> <p>A summary of what is scoped in and out of this assessment is detailed in paragraphs 6.3.13 – 6.3.16.</p>

## Statutory Consultation

- 6.3.2 Statutory Consultation for the Proposed Project took place between 24 October and 18 December 2023. A further Targeted Consultation exercise on the main changes to the Proposed Project introduced after the 2023 statutory consultation, was undertaken between 8 July and 11 August 2024. In addition, a project update and a local engagement exercise took place between 22 November 2024 and 12 January 2025, focusing on design amendments made following Targeted Consultation. A summary of relevant feedback received during consultation relating to agriculture and soils is provided below. Further details on how consultation responses have informed the assessment are provided in **Application Document 5.1 Consultation Report** and **Application Document 5.1.9 Appendix H Summary 2023 Response**.

**Table 6.6 Key topics raised during consultation**

Stakeholder	Key topics raised by stakeholder	Summary of National Grid's response
Natural England	Soil Management Plan	Pre-construction surveys are committed to, will be undertaken in line with published guidance and will be used to update the outline Soil Management Plan with site specific information as set out in the Defra Construction Code of Practice. An oSMP has been produced for the Suffolk Onshore Scheme and contains measures informed by the site specific desk-based information. The oSMP is committed to be updated in line with pre-construction information. The oSMP includes the requirements for on-going supervision and monitoring as well as the required competencies to be held by the responsible parties. Where agricultural land is to be returned to productive use the handling methodologies will outline the methods to minimise potential function loss as far as is practicable. For further details please refer to <b>Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk</b> .
	Impacts on BMV Land	This ES chapter has assessed the impacts of the Suffolk Onshore Scheme for both soil and for BMV, examined the impacts both during construction and operation, as well as the temporary and permanent land take for different aspects of the infrastructure. Any options appraisal work undertaken prior to the assessment, such as that undertaken during the route selection, uses the Department for Environment, Food and Rural Affairs (Defra) Provisional ALC mapping layer to identify areas potentially comprising Best and Most Versatile (BMV) land. As this layer does not differentiate between 3a and 3b, a precautionary assumption that all Grade 3 is BMV land was made at that stage.
Friston Parish Council	Impacts on BMV land and food security	This ES chapter provides an assessment of the impact of the Suffolk Onshore Scheme both during construction and operation, as well as the temporary and permanent take for different aspects of the infrastructure. The potential impact any development which disrupts agricultural activity has on food security is complex given the range of variables involved. For example, productive land may not actually be used to its full potential, the extent of food imported can change, efficiency of transport routes can be affected by a variety of events and the role influence of big supermarkets has will vary. In terms



Stakeholder	Key topics raised by stakeholder	Summary of National Grid's response
		of policy, there is no requirement to have to take account of food security other than the reference (EN-1 paragraphs 5.10.8 and 5.10.15) to seeking to minimise impacts on best and most versatile (BMV) land; the assessment of impacts on BMV land in Suffolk is addressed within this chapter.
	Landowner and economic impacts	Any economic effects on landowners due to fragmentation or loss of land have been noted in the assessment. These are anticipated to be addressed through landowner discussions and any compensation payments undertaken by National Grid; such agreements lie outside the scope of this ES chapter.
Saxmundham Town Council	Wildlife Impacts	The ecological surveys undertaken to inform the ES have considered the importance of farmland for biodiversity including nesting birds such as skylarks and mitigation measures have been proposed as necessary. Please refer to <b>Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity</b> for further details.
Forestry Commission	Ancient Woodland Root protection Areas (RPAs)	Details around soil working and management measures are detailed in <b>Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk</b> , here measures on the avoidance of working and laydown within designated and sensitive areas are detailed.

6.3.3

## Further Engagement

- 6.3.4 An initial Thematic meeting was held with Suffolk County Council and East Suffolk Council on 21<sup>st</sup> March 2024. Topics covered at the meeting included an initial overview of the proposed assessment as well as a preliminary introduction to the potential feasibility of using predictive modelling as an alternative assessment approach to conducting physical surveys. An outline of the proposed mitigation measures to be included in the outline Soil Management Plan was also discussed. Items raised by the local planning authorities included ensuring that the proposed assessment followed Ministry of Agriculture, Fisheries and Food (MAFF) ALC guidelines of considering auger locations at a minimum density of one auger per hectare. Further detail on the methodology and approach used for the Predictive ALC Assessment can be found in **Application Document 6.3.2.6.A Appendix 2.6.A Predictive Agricultural Land Classification Report- Suffolk**.
- 6.3.5 Further engagement in the form of meetings was undertaken with Natural England in relation to the use of predictive ALC mapping in November and December 2024. The approach and data sources were presented to Natural England during these meetings,

along with a commitment to complete the surveys pre-construction to inform the development of the Soil Management Plan.

## Summary of Scope of Assessment

- 6.3.6 This section details what aspects have been scoped in and scoped out of the assessment through the scoping process and consultation with stakeholders.

### Potential agriculture and soils receptors

- 6.3.7 BMV land: BMV land refers to land that falls into Grades 1, 2 and 3a of the ALC system. In this context, BMV land is viewed as a specific function of land and soils, and is the cumulation of various factors such as soil type, climate, gradient etc. Whilst linked to agricultural production, the impact on BMV land does not account for whether the land is in agricultural production or not, regardless of grade.
- 6.3.8 Soil: The impacts on soils are assessed based upon the array of soil functions that are described in [Table 6.7](#) and the sensitivity of soil types as detailed in [Table 6.8](#).
- 6.3.9 Land in Agricultural Production: This is a receptor that is primarily focussed on land in agricultural use at the time of assessment.
- 6.3.10 Agricultural Operations: This receptor primarily deals with the normal running of agricultural businesses (e.g. how land parcels are accessed, farm infrastructure).
- 6.3.1 Economic effects: This receptor accounts for the social and economic functioning of these businesses.
- 6.3.2 Electromagnetic frequencies: This assessment would cover where EMFs may be found to impact on sensitive receptors such as horses and/or riding schools.

### Aspects scoped into the assessment

- 6.3.3 The scope of this assessment has considered the temporary and permanent impacts on agriculture and soils receptors during the construction, maintenance and decommissioning of the Proposed Project.
- 6.3.4 Temporary and permanent impacts on BMV land and soils during construction, operation and decommissioning have been considered in the assessment.
- 6.3.5 Whilst the aspects listed below have been scoped out it has been agreed that further information on the extent of permanent land take affecting agricultural receptors will be set out (Section 6.9).

### Aspects scoped out of the assessment

- 6.3.6 The following aspects have been scoped out of the assessment (noting that the extent of permanent land take will be set out):
- temporary removal of land from agricultural production (construction, maintenance and decommissioning);
  - permanent removal of land from agricultural production (operation);

- temporary disruption and disturbance to agricultural operations from noise, fragmentation and disruption to water supplies and land drainage (construction, maintenance and decommissioning);
- economic effects on landowners (construction, operation, maintenance, and decommissioning); and
- effects of EMFs on land use (operation).

## 6.4 Approach and Methodology

6.4.1 **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology** sets out the overarching approach that has been used in undertaking the Environmental Impact Assessment (EIA). This section describes the technical methods used to determine the baseline conditions, the sensitivity of the receptors, and the magnitude of effects, and sets out the significance criteria that have been used for the agriculture and soils assessment.

### Guidance Specific to the Agricultural and Soils Assessment

6.4.2 The agriculture and soils assessment has been carried out with regard to the following good practice guidance documents:

- Safeguarding our Soils: A Strategy for England (Department for Food and Rural Affairs, 2009);
- Technical Information Note 049. ALC Protecting the Best and Most Versatile Agricultural Land (Natural England, 2012);
- Guide to assessing development proposals on agricultural land (Natural England, 2021);
- Guidance Note: Working with Soil Guidance Note on Benefitting from Soil Management in Development and Construction (British Society of Soil Science, 2022);
- British Standard Specification for Topsoil and Requirements for Use (BS3882:2015) (British Standards Institute, 2015);
- Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Department for Environment, Food and Rural Affairs, 2009);
- Institute of Quarrying (IoQ) Good Practice Guide for Handling Soils in Mineral Workings (Institute of Quarrying, 2021);
- Agricultural Land Classification of England and Wales. Revised Guidelines and Criteria for Grading the Quality of Agricultural Land (Ministry of Agriculture, Fisheries and Food, 1988); and
- A New Perspective on Land and Soil in Environmental Impact Assessment (Institute of Environmental Management & Assessment, 2022).

## Baseline Data Gathering and Forecasting Methods

- 6.4.3 This section describes the methodology used to establish the existing and future baselines together with the methodology/approach used to undertake the assessment of effects on agriculture and soils.

### Data Sources

- 6.4.4 The baseline has been informed by a desk study which has drawn on the following key information sources:
- British Geological Survey (BGS) online mapping for bedrock and superficial geology (British Geological Survey, 2024);
  - OS mapping and aerial photography to establish land use and settlement patterns;
  - Soilscape mapping showing the distribution of main soil types was assessed on the Land Information System website (Cranfield University, 2024);
  - ALC mapping, including provisional and (where available) detailed ALC mapping from the MAGiC website (Department for Environment, Food and Rural Affairs, 2025); and
  - Extent of agri-environmental, and woodland and forestry schemes from the MAGiC website (Department for Environment, Food and Rural Affairs, 2025).

### Study Area

- 6.4.5 The study area for Agriculture and Soils comprises the area directly affected by the Proposed Project, as defined by the Order Limits (see **Application Document 2.2.1 Overall Location Plan**). This is considered an appropriate study area based on professional judgement, knowledge of similar projects, and the Design Manual for Roads and Bridges (DMRB) LA109: Geology and Soils (Highways England, 2019) and was not raised as a concern in the Scoping Opinion (**Application Document 6.14 Environmental Scoping Report 2022**) received for the Proposed Project.

### Site Survey and Predictive Modelling

- 6.4.6 It was not possible to undertake surveys to determine physical soil characteristics within the Order Limits to the depth required (1.2 m below ground level; as detailed in the MAFF Guidelines) due to constraints relating to the potential high-risk category of Unexploded Ordnance (UXO) identified during desk-based assessments (Zetica, 2024).
- 6.4.7 As a result, a comprehensive methodology was used to predict the likely ALC grades, as discussed with Natural England. The full methodology is detailed in **Application Document 6.3.2.6.A Predictive Agricultural Land Classification Report – Suffolk**.
- 6.4.8 The predictive methodology uses the Welsh Government's (2021) Predictive Agricultural Land Classification Map (Wales) Guidance Note V2.1 (Welsh Government, 2021) and applies desk-based information (where reliable) to the assessment process as defined in the published guidelines (Ministry of Agriculture, Fisheries and Food, 1988). The approach used was developed as part of another major infrastructure project (where survey access was also restricted) where engagement with key stakeholders, including Natural England, Welsh Government and Defra, was a key part of the methodology development. There was subsequently the opportunity to complete the ALC surveys on that project and use the field data to check the predictive grading; this

showed a high level of correlation, especially in relation to how well the prediction estimated the extent of BMV land. It is recognised that landscapes, geologies and soil types will give different levels of accuracy in the prediction, but it is considered that use of this approach, in the absence of survey access, provides a better estimate of the extent of BMV land than relying on the available Provisional ALC mapping.

6.4.9 Surveys will be completed preconstruction (ALC and soil) once the UXO risk has been addressed as part of the early construction works. This information will be used to update the mitigation measures where required as detailed in **Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk**.

6.4.10 For the predictive ALC mapping, the following desk-based information was gathered to assess the likely most limiting factor in relation to land grade:

- Climate;
- Elevation;
- Gradient;
- Flood Zone;
- BGS Bedrock (1:50 k);
- BGS Superficial Deposits (1:50 k);
- Soil association and associated characteristics (texture, wetness class, and droughtiness);
- Ministry of Agriculture Fisheries and Food (MAFF) Provisional (Pre-1988) ALC grade; and
- Defra/Natural England 'Likelihood of Best and Most Versatile (BMV) Agricultural Land' (GIS layer available free online

### **Assessment Methodology**

6.4.11 This section sets out the methodology used for assessing the effects on Agriculture and Soils for those aspects scoped into the assessment, as set out within Section 7.3 and agreed within the Scoping Opinion (**Application Document 6.14 Environmental Scoping Report 2022**).

6.4.12 The following methodology sets out the assessment of sensitivity, the degree of damage to/loss of soil resources, agricultural land, and agricultural landholdings, and the subsequent impact of the Proposed Project on Agriculture and Soils, determining if effects are likely to be significant.

6.4.13 The assessment draws on guidance set out by the Institute of Environmental Management and Assessment (IEMA) on how land and soils should be assessed in EIA (Institute of Environmental Management & Assessment, 2022).

6.4.14 The IEMA guidance seeks to move practice away from a narrow focus on quantifying and financially compensating effects on agricultural land and advocates a new and wider approach to assessing the soil functions, ecosystem services, and natural capital provided by land and soils.



## Assessment Criteria

### Value/sensitivity

- 6.4.15 [Table 6.7](#) and [Table 6.8](#) set out the criteria that have been used to determine the sensitivity of receptors addressed in the Agriculture and Soils assessment. [Table 6.7](#) sets out the sensitivity of soils in relation to the functions they provide (linked to ecosystem services). It should be noted that this chapter does not assess impacts to receptors assessed in other chapters (for example ecological or archaeological receptors) but does assess the importance of soils in the delivery of the associated soil functions.
- 6.4.16 [Table 6.7](#) sets out three categories in relation to how sensitive different soil types are to handling and the resilience of soil structural units.
- 6.4.17 The IEMA guidelines separate receptor sensitivity into the following categories: Very High, High, Medium, Low, and Negligible (Institute of Environmental Management & Assessment, 2022).

**Table 6.7 Guidance on sensitivity of soil resources in relation to soil functions**

Receptor Sensitivity	Soil Resource and Soil Functions
Very High	<p>Biomass production: ALC Grades 1 &amp; 2.</p> <p>Ecological habitat, soil biodiversity and platform for landscape: Soils supporting protected features within a European site (e.g., Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar); Peat soils; Soils supporting a National Park, or Ancient Woodland.</p> <p>Soil carbon: Peat soils.</p> <p>Soils with potential for ecological/landscape restoration.</p> <p>Soil hydrology: Very important catchment pathway for water flows and flood risk management.</p> <p>Archaeology, Cultural Heritage, Community Benefits and Geodiversity: Scheduled Ancient Monuments (SAMs) and adjacent areas; World Heritage and European designated sites; Soils with known archaeological interest; Soils supporting community/recreational/educational access to land covered by National Park designation.</p> <p>Source of materials: Important surface mineral reserves that would be sterilised (i.e., it would no longer be possible to access the resources).</p>
High	<p>Biomass production: ALC Grade 3a.</p>

Receptor Sensitivity	Soil Resource and Soil Functions
	<p>Ecological habitat, soil biodiversity and platform for landscape: Soils supporting protected features within a UK designated site (e.g., United Nations Educational, Scientific and Cultural Organisation (UNESCO) Geoparks, Site of Special Scientific Interest (SSSI) or Area of Outstanding Natural Beauty (AONB), Special Landscape Areas (SLAs) and Geological Conservation Review sites); Native Forest and woodland soils; Unaltered soils supporting seminatural vegetation (including the UK Biodiversity Action Plan (UKBAP) Priority habitats or Section 6 habitats in Wales).</p> <p>Soil carbon: Organo-mineral soils (e.g., peaty soils).</p> <p>Soil hydrology: Important catchment pathway for water flows and flood risk management.</p> <p>Archaeology, Cultural Heritage, Community Benefits and Geodiversity: Soils with probable but as yet unproven (prior to being revealed by construction) archaeological interest; historic parks and gardens; Regionally Important Geological Site (RIGS); Soils supporting community/recreational/educational access to RIGS and AONBs.</p> <p>Source of materials: Surface mineral reserves that would be sterilised (i.e., it would no longer be possible to access the resources).</p>
Medium	<p>Biomass production: ALC Grade 3b.</p> <p>Ecological habitat, soil biodiversity and platform for landscape: Soils supporting protected or valued features within non-statutory designated sites (e.g., Local Nature Reserves (LNRs), Local Geological Sites (LGSs), Sites of Nature Conservation Importance (SNCIs), SLAs; Non-Native Forest and woodland soils.</p> <p>Soil carbon: Mineral soils.</p> <p>Soil hydrology: Important minor catchment pathway for water flows and flood risk management.</p> <p>Archaeology, Cultural Heritage, Community Benefits and Geodiversity: Soils with possible but as yet unproven (prior to being revealed by construction) archaeological interest; Soils supporting community/recreational/educational access to land.</p> <p>Source of materials: Surface mineral reserves that would remain accessible for extraction.</p>
Low	<p>Biomass production: ALC Grade 4 and 5 or Urban soils.</p>

Receptor Sensitivity	Soil Resource and Soil Functions
	<p>Ecological habitat, soil biodiversity and platform for landscape: Soils supporting valued features within non designated notable or priority habitats/landscapes. Agricultural soils.</p> <p>Soil carbon: Mineral soils.</p> <p>Soil hydrology: Pathway for local water flows and flood risk management.</p> <p>Archaeology, Cultural Heritage, Community Benefits and Geodiversity: Soils supporting no notable cultural heritage, geodiversity nor community benefits; Soils supporting limited community/recreational/educational access to land.</p> <p>Source of materials: Surface mineral reserves that would remain accessible for extraction.</p>
Negligible	As for low sensitivity, but with only indirect, tenuous, and unproven links between sources of impact and soil functions.

**Table 6.8 Determination of sensitivity criteria in relation to soil handling and soil structural resilience**

Sensitivity of Topsoil and Subsoil	Soil Texture, Field Capacity Days, and Wetness Class
High Sensitivity (low resilience to structural damage)	<p>Soils with high clay and silt fractions (clays, silty clays, sandy clays, heavy silty clay loams and heavy clay loams) and organo-mineral and peaty soils where the Field Capacity Days (FCD)<sup>1</sup> are 150 or greater.</p> <p>Medium-textured soils (silt loams, medium silty clay loams, medium clay loams and sandy clay loams) where the FCDs are 225 or greater.</p> <p>All soils in wetness classes<sup>2</sup> Wetness Class Value (WVC) or Wetness Class (WC) VI.</p>

<sup>1</sup> Field Capacity Days (FCD) is a meteorological parameter which estimates the period when the soil moisture deficit is zero. This will be a period usually between Autumn/early Winter and the Spring, at which point evapotranspiration begins to exceed rainfall and a water deficit begins to accumulate.

<sup>2</sup> Wetness Classes are determined based on the depth and persistence of waterlogging within a soil profile. For example, if there are no limitations to drainage and no evidence of waterlogging within 70 cm of the soil surface, the profile would have a Wetness Class of I. Conversely, if the FCDs is high and there is evidence of waterlogging close to the surface, the profile may have a Wetness Class of V or VI (the lowest classes).

<b>Sensitivity of Topsoil and Subsoil</b>	<b>Soil Texture, Field Capacity Days, and Wetness Class</b>
Medium Sensitivity (medium resilience to structural damage)	<p>Clays, silty clays, sandy clays, heavy silty clay loams, heavy clay loams, silty loams and organo-mineral and peaty soils where the FCDs are fewer than 150.</p> <p>Medium-textured soils (silt loams, medium silty clay loams, medium clay loams and sandy clay loams) where FCDs are fewer than 225.</p> <p>Sands, loamy sands, sandy loams and sandy silt loams where the FCDs are 225 or greater or are in wetness classes WCIII and WCIV.</p>
Low Sensitivity (high resilience to structural damage)	Soils with a high sand fraction (sands, loamy sands, sandy loams and sandy silt loams) where the FCDs are fewer than 225 and are in wetness classes WCI to WCII.

### **Magnitude of Impact**

6.4.18 [Table 6.9](#) sets out the criteria (Institute of Environmental Management & Assessment, 2022) which has been used to assess the magnitude of impact on receptors addressed in the Agriculture and Soils assessment.

**Table 6.9 Determination of magnitude criteria for impact on agricultural land and soils**

<b>Magnitude of Impact (Change)</b>	<b>Description of Impacts Restricting Proposed Land Use</b>
Large	<p>Permanent, irreversible loss of one or more soil functions or soil volumes (including permanent sealing or land quality downgrading), over an area of more than 20 ha or loss of soil-related features set out in <a href="#">Table 6.7</a> (including effects from 'Temporary Developments' *);</p> <p>or</p> <p>Potential for permanent improvement in one or more soil functions or soil volumes due to remediation or restoration over an area of more than 20 ha or gain in soil-related features set out in <a href="#">Table 6.7</a> (including effects from 'Temporary Developments' *).</p>
Medium	Permanent, irreversible loss of one or more soil functions or soil volumes, over an area of between 5 and 20 ha or loss of soil-

\* Temporary developments can result in a permanent impact if resulting disturbance or land use changes cause permanent damage to soils

Magnitude of Impact (Change)	Description of Impacts Restricting Proposed Land Use
	<p>related features set out in <a href="#">Table 6.7</a><del>Table 6.7</del> (including effects from ‘Temporary Developments’*);</p> <p>or</p> <p>Potential for improvement in one or more soil functions or soil volumes due to remediation or restoration over an area of between 5 and 20 ha or gain in soil-related features set out in <a href="#">Table 6.7</a><del>Table 6.7</del>.</p>
Small	<p>Permanent, irreversible loss over less than 5 ha or a temporary, reversible loss of one or more soil functions or soil volumes), or temporary, reversible loss of soil related features set out in <a href="#">Table 6.7</a><del>Table 6.7</del> above;</p> <p>or</p> <p>Potential for permanent improvement in one or more soil functions or soil volumes due to remediation or restoration over an area of less than 5 ha or a temporary improvement in one or more soil functions due to remediation or restoration or off-site improvement, or temporary gain in soil-related features set out in <a href="#">Table 6.7</a><del>Table 6.7</del>.</p>
Negligible	No discernible loss or reduction or improvement of soil functions or soil volumes that restrict current or proposed land use.

### Significance of effects

- 6.4.19 The significance of effects has been assessed considering the sensitivity of the agriculture and soil receptors within the Order Limits, and the magnitude of change (impact) likely to be caused by the activities of the Proposed Project. These factors are combined to give an overall significance of effect.
- 6.4.20 Significance has been derived using the matrix set out in **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology**. This has been supplemented by professional judgement which, where applicable, has been explained to give the rationale behind the values assigned. Likely significant effect, in the context of the EIA Regulations, are effects of moderate or greater significance.

### Assumptions and Limitations

- 6.4.21 ALC surveys were not undertaken because the high risk of potential UXO presence meant that intrusive surveys, to the depth and frequency required, posed a risk to surveyors.
- 6.4.22 As ALC surveys were not able to be safely undertaken, an assessment was conducted of the likely soil types present and the factors affecting soils at any given location to assess the potential ALC grade using the MAFF revised guidelines (Ministry of Agriculture, Fisheries and Food, 1988) and criteria for grading the quality of agricultural



land. The baseline information for this assessment is set out in Section 6.7. The predictive approach was discussed with Natural England and is further detailed in **Application Document 6.3.2.6.A Predictive Agricultural Land Classification Report – Suffolk**.

6.4.23 It is noted (see paragraph 6.4.8) that this approach has limitations when compared to physical ALC surveys, with the outcome for each location point assessed being a modelled prediction and not therefore definitive, albeit based on the best available data. The method adopted has, however, been used to supplement the available provisional ALC mapping at a scale of 1:250,000 (which is not considered suitable for use at a project level) to provide a greater level of refinement than using the provisional ALC 1:250,000 mapping alone. This predictive data has been used to support the data available and the assessment of effects.

6.5 Basis of Assessment

- 6.5.1 This section sets out the assumptions that have been made in respect of design flexibility maintained within the Proposed Project and the consideration that has been given to alternative scenarios and the sensitivity of the assessment to changes in the construction commencement year.
- 6.5.2 Details of the available flexibility and assessment scenarios are presented in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** and **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology**.

Flexibility Assumptions

- 6.5.3 The environmental impact assessments have been undertaken based on the description of the Proposed Project provided in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. To take account of the flexibility allowed in the Proposed Project, consideration has been given to the potential for effects to be of greater or different significance should any of the permanent or temporary infrastructure elements be moved within the Limits of Deviation (LoD) or Order Limits.
- 6.5.4 The assumptions made regarding the use of flexibility for the main assessment are set out in [Table 6.10](#)~~Table 6.10~~ below.

Table 6.10 Flexibility assumptions

Element of flexibility	How it has been considered within the assessment
Lateral LoD	Changes to the cable route within the LoD are not expected to result in new impacts on agriculture and soils.
High Voltage Direct Current (HVDC)/High Voltage Alternating Current (HVAC) cables	An assumption of an open cut installation technique has been made. It is also assumed that all land required temporarily will be reinstated following cable installation. A

Element of flexibility	How it has been considered within the assessment
	<p>minimum depth of 0.9 m installation depth is assumed as detailed in <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b>.</p>
<p>Lateral LoD</p> <p>Saxmundham Converter Station and Friston Substation</p>	<p>Changes to the footprint of the Converter station and substation within the LoD would not be expected to result in new impacts on agriculture and soils. The soil and ALC grades across the full Order Limits have been assessed, allowing the maximum flexibility within the assessment. Any change in the location of the converter station within the LoD (comprising 9.2 ha) would not result in a change to the extent of BMV land affected. The same would apply to the Friston Substation (where an LoD of 3.02 ha has been allowed for).</p>
<p>Vertical LoD</p> <p>Saxmundham Converter Station and Friston Substation</p>	<p>The vertical LoD does not change the assessment presented in this chapter as this would not change the location or footprint of either facility.</p>
<p>Lateral and Vertical LoD overhead line (where Friston Substation is built as part of the Proposed Project).</p>	<p>Changes to the lateral alignment of the proposed overhead line works would not be expected to result in new impacts on agriculture and soils, as the soil conditions across the full Order Limits have been assessed and therefore the maximum flexibility has been assessed. The vertical LoD of the OHL does not change the assessment presented in this chapter as they remain inside the Order Limits.</p>
<p>Order Limits – temporary construction works</p>	<p>Changes to the layout of temporary construction works within the Order Limits are not expected to result in new impacts on agriculture and soils; the soil conditions across the full Order Limits have been assessed and therefore the maximum flexibility has been assessed.</p>

## Consideration of Scenarios

- 6.5.5 The following scenarios with regards to Friston Substation have been considered in the assessment as explained in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**:
- Friston Substation is constructed under the development consent granted to Scottish Power Renewables (SPR), pursuant to 'The East Anglia ONE North (EA1N) Offshore Wind Farm Order 2022' and 'The East Anglia TWO (EA2) Offshore Wind Farm Order 2022'; or
  - Friston Substation is built as part of the Proposed Project.
- 6.5.6 The construction of the proposed Friston Substation as part of the Proposed Project has been considered within the assessment as the worst-case scenario.
- 6.5.7 The following options with regards to the proposed bridge over the River Fromus have been considered in the assessment as described in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project:
- Option 1 - A bridge height of up to 6 m (from the ground level at the abutment to the top of the parapet) with 62 m long approach ramps; and
  - Option 2 - A bridge height of up to 4 m (from the ground level at the abutment to the top of the parapet) with 42 m long approach ramps.
- 6.5.8 For the purpose of the assessment a worst-case scenario was assumed, using the larger of the two bridge footprints (Option 1) as the potential permanent land take value.
- 6.5.9 There is also optionality regarding the converter station construction compound location. Any one of the three areas of land included within the Order Limits (S02, S03 and S04/05), as illustrated in **Application Document 2.14.1 Indicative General Arrangement Plans – Suffolk**, could be used for this purpose. With regard to effects on agriculture and soils receptors, the construction compounds are considered as part of the temporary effects. Temporary effects are assessed on all land within the Order Limits. As such, full flexibility has been assessed, and the location of the proposed construction compound will have no effect on the outcome of the assessment.

## Sensitivity Test

- 6.5.10 It is likely that under the terms of the draft DCO, construction could commence in any year up to five years from the granting of the DCO, which is assumed to be 2026. Consideration has been given to whether the effects reported would be any different if the works were to commence in any year up to year five. It is considered that the start year has no effect on the outcome of the Agriculture and Soils assessment.

## 6.6 Study Area

- 6.6.1 The study area for agriculture and soils comprises the land which would be directly affected within the Order Limits for the Suffolk Onshore Scheme (through disturbance or temporary covering of the soils). This is illustrated in **Application Document 2.2.1 Overall Location Plan**, and is based on consideration of the distance over which likely significant effects can reasonably be expected to occur and technical knowledge of similar schemes.

## 6.7 Baseline Conditions

### Soils

- 6.7.1 The solid geology underlying the majority of the Order Limits is described as bedrock of the Crag Formation, comprising sands, gravels, silts, and clays. The gravels in the lower part of the group are almost entirely composed of flint.
- 6.7.2 The solid geology is in the main overlain by diamicton till superficial deposit (Lowestoft Formation). This material was deposited around three million years ago in the Quaternary Period when the local environment was dominated by ice age conditions. Closer to the coast the superficial deposits are replaced by glacial sands and gravel formed up to three million years ago in the Quaternary Period. Further detail is provided in **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology**.
- 6.7.3 The soil types present within the Order Limits are comprised of three major types as shown on **Application Document 6.4.2.6.1 Soils Mapping**. Along the eastern areas the soil is described as freely draining and slightly acidic sandy soils. Moving westwards the soils around Leiston are categorized as freely draining acid but base-rich highly fertile loamy soils. The north-western section of the Proposed Project site, around Saxmundham, consists of slowly permeable, and seasonally wet, slightly acid but base-rich loamy and clayey soils.
- 6.7.4 The main Soil Associations (representing a group of soil series (soil types) which are typically found occurring together in the landscape (Hodge, 1984)) have been identified within the Order Limits as follows:
- Newport 4: Deep well-drained sandy soils. Some very acid soils with bleached subsurface horizon especially under heath or in woodland. Parent material: Glaciofluvial drift.
  - Hanslope: Slowly permeable calcareous soils. Parent material: Chalky till.
  - Ragdale: Slowly permeable, seasonally waterlogged, clayey and fine loamy over clayey soils. Parent material: Chalky till.
  - Melford: Deep well drained fine loamy over clayey soils. Parent material: Chalky till.
  - Newport 2: Deep well-drained sandy often ferruginous soils. Parent materials: Glaciofluvial drift over Cretaceous sand or Crag.
  - Sandwich: Mainly deep well drained calcareous and non-calcareous sandy soils. Parent material: Dune sand and marine shingle.
- 6.7.5 It is considered that these soils are of **very high**, **high** and **medium** sensitivity in relation to their soil functions as detailed in [Table 6.7](#) and [Table 6.8](#).

### Agricultural Land Classification

- 6.7.6 Provisional ALC mapping, presented in **Application Document 6.4.2.6.2 Provisional Agricultural Land Classification Mapping**, shows that the study area is comprised predominantly of Grade 2, 3, and 4 land. This mapping, at a scale of 1:250,000, does not distinguish between Grades 3a and 3b (Provisional Mapping is developed from interpolated data gathered from existing national datasets and the grading was based mainly on reconnaissance level ground observations of soil and topography,

supplemented by information from agricultural and horticultural advisers; they were published before the ALC system was updated to divide Grade 3 into grades 3a and 3b) and therefore cannot be used to inform site-specific assessments as stated by Natural England (Natural England, 2010)) but provides an indication of the likely land classification. The Provisional ALC information indicated that a large portion of the study area may comprise BMV land. BMV land comprises land in Grades 1, 2, and 3a.

- 6.7.7 There is some existing detailed ALC mapping available local to the study area, which is based on surveys undertaken between 1993 and 2016. The land around Sizewell, and fields to the North of Minsmere have been mapped as a mix of Grade 3a, Grade 3b, and Grade 4, with a small area of Grade 1 located east of Lover's Lane (as shown in **Application Document 6.4.2.6.3 Detailed Agricultural Land Classification Mapping**).
- 6.7.8 Topography is unlikely to pose a limitation to land grade. There are limited areas where there is a flood risk outside of the coastal areas surrounding Sizewell and Thorpness, and it is not considered that flood risk poses a limitation to land grade due to the sandy nature of the soils across much of the area.
- 6.7.9 Climate is unlikely to pose an overall limitation on ALC grade in relation to the criteria set out in the ALC Guidelines (Ministry of Agriculture, Fisheries and Food, 1988). Climate does, however, have an important influence on the interactive limitations of soil wetness and droughtiness, which is the balance between rainfall and water losses from the soil. The study area has both relatively low rainfall and a long growing season, acting to decrease the severity of any potential soil wetness limitation, but increasing the severity of any potential soil droughtiness limitation.
- 6.7.10 Nationally, 65.1% of land in England (Ministry of Agriculture, Fisheries and Food and ADAS, 1983) is provisionally graded as Grades 1, 2 and 3, and is therefore likely to comprise of BMV land. A comparison of Provisional ALC across the districts within the study area, against those for England as a whole, is set out in [Table 6.11](#)~~Table 6.11~~.

**Table 6.11 Provisional agricultural land by area (ha) across the Proposed Project**

ALC Grade	Suffolk County [Area (%)]	Suffolk Coastal District [Area (%)]	England [Area (%)]
Grade 1	4,568 (1.2%)	82 (0.1%)	354,562 (2.7%)
Grade 2	95,686 (25.1%)	15,914 (17.8%)	1,848,874 (14.2%)
Grade 3	195,314 (51.3%)	42,888 (48.0%)	6,290,210 (48.2%)
<i>Total extent of Grades 1, 2 and 3</i>	<i>295,568 (77.6%)</i>	<i>58,884 (65.9%)</i>	<i>8,493,646 (65.1%)</i>
Grade 4	47,143	19,067	1,839,581



	(12.4%)	(21.3%)	(14.1%)
Grade 5	1,164 (0.3%)	0 (0%)	1,100,305 (8.4%)
Non-Agricultural	25,900 (6.8%)	9,524 (10.7%)	655,856 (5.0%)
Urban	11,240 (2.9%)	1,953 (2.2%)	951,424 (7.3%)

## Predictive Agricultural Land Classification

- 6.7.11 Where detailed mapping was not available from published sources. ALC grade predictive mapping was undertaken. The results from this analysis are shown in **Application Document 6.4.2.6.4 Predictive Agricultural Land Classification Mapping**, with full details presented in **Application Document 6.3.2.6.A Appendix 2.6.A Predictive Agricultural Land Classification Report - Suffolk**.
- 6.7.12 The extent of each predicted ALC grade within the Order Limits is presented in [Table 6.12](#).

**Table 6.12 Predictive agricultural land by area (ha) across the Proposed Project**

ALC Grade	Area (ha)	Area (%)
Grade 1	0.00	0.00 %
Grade 2	34.80	12.46 %
Grade 3a	154.45	55.29 %
<i>Total Predicted BMV land</i>	<i>189.25</i>	<i>67.75 %</i>
Grade 3b	44.28	15.85 %
Grade 4	35.18	12.59 %
Grade 5	0.00	0.00 %
Other Land/Non-agricultural	10.63	3.81 %
<b>Total</b>	<b>279.343 ha</b>	<b>100 %</b>

- 6.7.13 Grade 2, and 3a land, covering approximately 189.25 ha (67.75 %) of the land within the Order Limits, is considered to be BMV agricultural land. BMV land is a receptor of **Very High** (Grade 2) or **High** (Grade 3a) sensitivity.

## Land Use

- 6.7.14 Detailed aerial photography and OS Mapping shows that the land use appears to be principally arable, with areas of urban development at Leiston, Saxmundham, and Thorpeness and a golf course at Aldeburgh.
- 6.7.15 There are areas of land within the study area under Countryside Stewardship (higher Tier) Agreements<sup>3</sup>, and areas south and east of Leiston under Entry Level plus Higher Level Environmental Stewardship agreements. There are also further small areas within the study area under Higher Level Environmental Stewardship, as well as Organic Entry Level plus Higher Level Stewardship areas to the north (see **Application Document 6.4.2.6.5 Agri-environmental Schemes**). There are a number of small areas of land across the proposed route that are also under Woodland Grant Schemes<sup>4</sup> (Levels 1, 2, and 3) (see **Application Document 6.4.2.6.6 Forestry and Woodland Grant Schemes**), as well as a Christmas tree plantation.

## Future Baseline

- 6.7.16 It is considered that the baseline in relation to soils and ALC grades would not change from that described within the timeframe for the construction of the Proposed Project.
- 6.7.17 While there may be potential changes in relation to climate change, including greater rainfall intensity and frequency of droughts, that could affect soil conditions, land grade, and farming practices, it is likely that these would only be visible over longer time frames.
- 6.7.18 There could potentially be changes to land management practices and business approaches across the landowners/land managers over the construction and operation (and maintenance) of the Proposed Project.

## 6.8 Proposed Project Design and Embedded Mitigation

- 6.8.1 The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce agricultural and soils impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project.
- 6.8.2 As set out in **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology**, mitigation measures typically fall into one of three categories: embedded measures; control and management measures; and additional mitigation measures. Embedded, and control and management measures are set out below. Additional mitigation measures are discussed in Section 6.10.

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<sup>3</sup> Stewardship and Agri-environment Schemes comprise government funding to farmers and land managers to support activities which improve the local environment. There are different levels of these schemes which have increasing complexity and land management requirements but also therefore have greater environmental benefits.

<sup>4</sup> Woodland Grant Schemes (WGS) comprise grants and other incentives for woodland creation, maintenance, management and tree health. WGS 1, 2 and 3 were time based, with WGS1 being replaced by WGS2 etc.

## Embedded Measures

6.8.3 Embedded measures have been integral in reducing, and where possible avoiding, the agriculture and soils effects of the Proposed Project. Measures that have been incorporated are:

- Sensitive routing and siting of infrastructure and temporary works to reduce environmental impacts, including on agricultural land and soils.;
- Rationalisation of the design to minimise permanent land take requirements including from agricultural land.;
- The temporary nature of many of the construction activities and the subsequent restoration of the land and its return to the preconstruction use is likely to result in the avoidance of long-term impacts on agricultural and soil receptors (AS11); and
- Commitments made within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)**.

## Control and Management Measures

6.8.4 Measures relevant to the control and management of impacts during construction have been included within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**. The following measures have been taken into account in assessing the agriculture and soils effects of the Proposed Project:

- GG03: The CEMP shall include measures to manage dust, waste, water, noise, vibration and soil during construction. The contractor(s) shall undertake daily site inspections to check conformance to the Management Plans. The title and contact number of person(s) accountable for issues relating to dust, waste, water, noise, vibration and soil will be displayed at the site boundary.
- GG04: A suitably experienced Environmental Manager will be appointed for the duration of the construction phase. In addition, a qualified and experienced Environmental Clerk of Works (ECoW) will be available during the construction phase to advise, supervise and report on the delivery of the mitigation methods and controls outlined in the CEMP. The ECoW will monitor that the works proceed in accordance with relevant environmental DCO requirements and adhere to the required good practice and mitigation measures. The ECoW will be supported as necessary by appropriate specialists, including ecologists, soil scientists and arboriculturists.
- GG06: A full photographic/aerial footage and descriptive record of condition (pre-condition survey) will be carried out of the working areas that may be affected by the construction activities prior to these works commencing. This record will be available for comparison following completion of reinstatement works to ensure that the standard of reinstatement at least meets that recorded in the pre-condition survey, or as agreed in the LEMP or if the DCO provides otherwise, then in accordance with the DCO.
- GG07: Land used temporarily will be reinstated (bearing in mind restrictions on planting and land use) to its pre-construction condition and use, unless agreed otherwise, save where the DCO provides otherwise, in which case such reinstatement will be in accordance with the DCO. This is subject to the provisions of Article 27 of the draft DCO. Hedgerows, fences and walls (including associated

earthworks and boundary features) will be reinstated to a similar style and quality to those that were removed, where possible, with landowner consultation.

- GG08: Where sensitive features will be retained within or immediately adjacent to the Order Limits, an appropriate protective area will be established using appropriate fencing and signage and will be inspected, repaired and replaced as necessary. The protective areas will be shown on the Retention and Reinstatement Plans contained within the LEMP.
- GG19: Earthworks and stockpiled soil will be protected by covering, seeding or using water suppression where appropriate.
- GG25: Stone pads or equivalent will be installed in areas where heavy equipment, such as cranes and piling rigs, will be used. The stone pads will provide stable working areas and will reduce disturbance to the ground. The stone pad area will be stripped of the topsoil, which will be stored and reinstated in accordance with the soil management measures contained in the CEMP. Archaeological mitigation will be undertaken, as appropriate, in areas where the pads have the potential to impact on archaeological remains. The mitigation will be agreed with the relevant stakeholder and will be in line with the outline Written Scheme of Investigation.
- AS01: The Outline Soil Management Plans set out specific guidance in relation to soil handling, including, soil stripping, soil stockpiling and soil reinstatement. These will be updated to Soil Management Plans prior to construction, to include information from soil and agricultural land classification (ALC) surveys. Measures will include but not be limited to the following:
  - preconstruction surveys in accordance with published guidance to confirm ALC grade and soil type;
  - how topsoil and subsoil will be stripped and stockpiled;
  - suitable conditions for when handling soil will be undertaken, for example avoiding handling of waterlogged soil;
  - indicative soil storage locations;
  - how soil stockpiles will be designed taking into consideration site conditions and the nature/composition of the soil;
  - specific measures for managing sensitive soils;
  - suitable protective surfacing where soil stripping can be avoided, and weed suppression encouraged, based on sensitivity of the environment and proposed works;
  - approach to reinstating soil that has been compacted, where required; and
  - details of measures required for soil restoration.
- AS02: Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated. This will be achieved to a depth of 1.2 m (or the maximum natural soil depth if this is shallower) except over buried cables where the reinstated soil depth will be a minimum of 0.9 m. This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner).
- AS03: Access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction period or as agreed through the

landowner discussions. This may require signed diversions or temporary restrictions to access. The means of access to affected properties, facilities and land parcels will be communicated to affected parties at the start of the project, with any changes communicated in advance of the change being implemented. Where field-to-field access points require alteration as a result of construction, alternative suitable field access will be provided in consultation with the landowner/occupier.

- AS04: Existing water supplies for livestock and irrigation will be identified pre-construction. Where supplies will be lost or access compromised by construction works, temporary alternative supplies will be provided. Water supplies will be reinstated following construction.
- AS05: Consultation with affected landowners will be carried out to investigate the current extent of land drainage which will be taken into account in the development of the Drainage Management Plan (see W14) prior to construction, with the intent of maintaining the efficiency of the existing land drainage system.
- AS06: Should animal bones be discovered during construction, which may indicate a potential burial site, works will cease, and advice will be sought from the Animal Health Regional Office on how to proceed, relevant to the origin and age of the materials found.
- AS07: All movement of plant and vehicles between fields will cease in the event of a notification by the Department for Environment, Food and Rural Affairs (Defra) of a disease outbreak in the vicinity of the site that requires the cessation of activities. Advice will be sought from Defra in order to develop suitable working methods required to reduce the biosecurity risk associated with the continuation of works.
- AS08: Clay bungs or other vertical barriers will be constructed within trench excavations where deemed necessary by a suitably experienced person, to prevent the creation of preferential drainage pathways.

6.8.5 **Application Document 7.5.10.1 Outline Soil Management Plan - Suffolk** sets out specific measures to mitigate damage through the disturbance of in-situ soil materials. It contains specific guidance in relation to soil handling, including, soil stripping, soil stockpiling and soil reinstatement.

## 6.9 Assessment of Impacts and Likely Significant Effects

6.9.1 The assessment of the effects of the Proposed Project on agriculture and soils receptors described in this section considers the embedded and control and management measures described in Section 6.8.

### Construction Phase

6.9.2 This section identifies the anticipated effects of the Proposed Project following the implementation of embedded, and control and management measures for the construction phase.

#### Soils

6.9.3 There would be disturbance to soils, from construction of the temporary access and haul roads, temporary construction compounds and construction laydown areas, soil



stripping of working areas for underground cabling, and soil stripping for the permanent infrastructure.

- 6.9.4 The impacts on soils have the potential to occur across the land within the Order Limits, adversely affecting the ecosystem services the soils provide over an area of up to approximately 279.343 ha. This could include, for example, soil compaction due to the movement of plant across the soil surface or poor restoration of disturbed soils resulting in mixing of the soil horizons and compaction, which could reduce the infiltration rate of rainfall and result in an increase in surface runoff and consequent erosion and flood risk.
- 6.9.5 In accordance with the control measures set out in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**, land required temporarily for construction would be reinstated to its pre-construction use and condition (or as agreed with the landowner). This would include removing temporary works such as compound areas and temporary access and haul roads. Implementation of these measures would reduce the detrimental effects on soil function and would mean that the reinstated soils are able to provide their associated ecosystem services following reinstatement. All topsoil stripped from the footprint of permanent infrastructure would be re-used within the Proposed Project (for example to support landscaping or ecological mitigation), again enabling those materials to continue to provide a range of soil functions.
- 6.9.6 As such, there would be a **small** magnitude impact on **very high, high and medium** sensitivity soils and their associated ecosystem services, which is assessed as a **moderate to minor** adverse effect, that is significant. This assessment is based on the predictive mapping and associated soil information; a precautionary approach has therefore been taken by assessing the sensitivity of the soils as being in the highest three categories.

**BMV Agricultural Land**

- 6.9.7 During construction there would be an impact on BMV land from construction of the temporary access and haul roads, temporary construction compounds and construction laydown areas, soil stripping of working areas for underground cabling, and soil stripping for the permanent infrastructure.
- 6.9.8 [Table 6.13](#) details the total extent of land at each predicted grade required for temporary and permanent aspects of the Proposed Project.

**Table 6.13 Predictive ALC grades (ha) affected by the temporary and permanent design features of the Proposed Project**

Project Aspect	Grade 2	Grade 3a	Grade 3b	Grade 4	Other/Non-agricultural	Total land take
Order Limits (temporary)	34.8	154.45	44.28	35.18	10.63	279.334
Access (permanent)	0.53	1.16	0.00	0.00	0.10	1.769

Project Aspect	Grade 2	Grade 3a	Grade 3b	Grade 4	Other/Non-agricultural	Total land take
Substations (permanent)	1.68	0.00	0.00	0.00	0.00	1.68
Converter station LoD (permanent)	0.00	6.5	0.00	0.00	0.00	6.5
Pylons (permanent)	0.02	0.00	0.00	0.00	0.00	0.02
Ecological change (permanent)	0.31	1.25	0.02	0.00	0.02	1.60
Total land required permanently	2.54	8.91	0.02	0.00	0.12	11.549
Total area of BMV land (Grade 2 and 3a) required permanently	11.45					

6.9.9 As such, there would be a temporary **small** magnitude impact on a receptor of **very high** and **high** sensitivity. In line with the matrix presented in **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology** this would be assessed as a **moderate to minor** adverse effect. However, in accordance with the control measures set out in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**, land required temporarily for construction would be reinstated to its pre-construction condition (or as agreed with the landowner). This would include removing temporary works such as compound areas and temporary access and haul roads. Implementation of these measures would reduce the detrimental effects on soils and ALC grade, with land being returned to its preconstruction ALC grade. Taking account of the control and management measures this would result in no more than a **minor** effect which is not significant.

The permanent loss of 11.45 ha of BMV land is considered a **medium** magnitude impact on a receptor of very high and high sensitivity, which is assessed as a **major** (Grade 2) to **moderate** (Grade 3a) adverse effect, that is significant. This assessment is based on the predictive ALC mapping; given the assessment outcome it is considered this is a precautionary approach.

## Operation and Maintenance Phase

6.9.10 This section identifies the anticipated effects of the Proposed Project following the implementation of embedded, and control and management measures for operation (and maintenance).

## Soils

- 6.9.11 Any maintenance or repair works required that would result in disturbance to soils would be undertaken in accordance with good practice methods. It is assumed any such impacts would be small scale, infrequent, and temporary, with any soils disturbed reinstated to their previous condition.
- 6.9.12 As such, there would be a **small** magnitude impact on **very high, high** and **medium** sensitivity soils and their associated ecosystem services. In line with the matrix set out in **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology** this would be assessed as a **moderate or minor** adverse effect. Based on the likely very temporary nature of maintenance activities it is assessed that this would be **minor** and not significant.

## Agricultural Land

- 6.9.13 Permanent loss of agricultural land reported under the Construction Phase section above would remain lost during the operational phase.
- 6.9.14 Any maintenance or repair works required on agricultural land, which could result in disturbance, would be undertaken in accordance with good practice methods as set out in the Defra Construction code of practice for the sustainable use of soil on construction sites (Department for Environment, Food and Rural Affairs, 2009), and detailed in the oSMP.
- 6.9.15 The extent and temporary nature of any such works is considered to result in a **small** magnitude impact on a receptor of **very high** and **high** sensitivity. In line with the matrix presented in **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology** this would be assessed as a **moderate or minor** adverse effect. However, based on the likely very temporary nature of maintenance activities it is assessed that this would be up to **minor** and not significant.

## Decommissioning Phase

- 6.9.16 This section identifies the anticipated effects of the Proposed Project following the implementation of embedded and control and management mitigation measures should the Proposed Project be decommissioned.

## Soils

- 6.9.17 During decommissioning there would be disturbance to soils, from construction of the temporary access and haul roads, temporary compounds and laydown areas. There would also be removal of infrastructure and the subsequent reinstatement of the land.
- 6.9.18 The impacts on soils have the potential to occur across the land within the Order Limits, adversely affecting the ecosystem services the soils provide. This could include, for example, soil compaction due to the movement of plant across the soil surface or poor restoration of disturbed soils resulting in mixing of the soil horizons and compaction, which could reduce the infiltration rate of rainfall and result in an increase in surface runoff and consequent erosion and flood risk. It is considered that the areas required for the decommissioning would be similar to those reported above during the construction phase.
- 6.9.19 There would also be a positive impact through the effective reinstatement of soils and land where infrastructure is removed.

- 6.9.20 All decommissioning works would be undertaken in accordance with good practice at the time of decommissioning as set out in the Defra Construction code of practice for the sustainable use of soil on construction sites (Department for Environment, Food and Rural Affairs, 2009), and detailed in the oSMP (**Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk**). Implementation of these measures would reduce the detrimental effects on soil function and would mean that the reinstated soils are able to provide their associated ecosystem services following reinstatement.
- 6.9.21 As such, there would be a **small** magnitude impact on **very high**, **high** and **medium** sensitivity soils and their associated ecosystem services. In line with the matrix presented in **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology** this would be assessed as a **moderate to minor** adverse effect that is significant. This assessment is based on the predictive mapping and associated soil information; a precautionary approach has therefore been taken by assessing the sensitivity of the soils as being in the highest three categories.
- 6.9.22 In the event that the Proposed Project is decommissioned and the land reinstated, there would also be a **medium** impact related to the permanent improvement in soil functions (from the operational position) which would be considered as **major to moderate** beneficial effect and significant.

### Agricultural Land

- 6.9.23 During decommissioning there would be an impact on BMV land from construction of the temporary access and haul roads, temporary construction compounds and construction laydown areas. There would also be removal of infrastructure and the subsequent reinstatement of the land.
- 6.9.24 It is assumed that the ALC grades will be as shown in the baseline, with the exception of areas of permanent infrastructure which will have been taken out of agricultural use.
- 6.9.25 It is assumed the impact would be similar to that identified during construction. This would be a temporary **small** magnitude impact on a receptor of **very high** and **high** sensitivity. In line with the matrix presented in **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology** this would be assessed as a **moderate to minor** adverse effect. However, it is expected that similar measures as those outlined in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice** would be in place and implementation of these measures would reduce the detrimental effects on soils and ALC grade, with land being returned to its pre-decommissioning ALC grade. Taking account of the control and management measures this would result in no more than a **minor** effect which is not significant.
- 6.9.26 In the event that the Proposed Project is decommissioned and the land reinstated there would also be the reinstatement of land used for above ground infrastructure. This would comprise the reinstatement of 11.47ha of BMV land which would be considered a beneficial impact of **medium** magnitude on a receptor of **very high** and **high** sensitivity, which is assessed as a **major to moderate** beneficial effect, that is significant.

## 6.10 Additional Mitigation

- 6.10.1 Where potential likely significant adverse effects are identified after considering embedded and control measures, 'additional mitigation measures' are proposed to further reduce, mitigate or offset the identified adverse environmental effects.

- 6.10.2 There are no additional mitigation measures which can be incorporated to further reduce likely significant effects on agriculture and soils.

## 6.11 Residual Effects and Conclusions

- 6.11.1 [Table 6.14](#) ~~Table 6.14~~ to [Table 6.16](#) ~~Table 6.16~~ summarise the residual effects of the Proposed Project on agriculture and soil receptors following the implementation of additional mitigation measures outlined in Section 6.10.



**Table 6.14 Summary of residual agriculture and soil effects (Construction)**

Receptor	Sensitivity	Description of Impact	Likely Significant Effect		Additional Mitigation Measures	Residual Effect	
			Magnitude	Significance		Magnitude	Significance
Soils	Very high, high and medium	Temporary impacts to soil function and disruption to soil ecosystem services	Moderate to minor adverse	Significant	None – impact is temporary and soils will be reinstated / re-used by the end of the construction phase	Moderate to minor adverse	Significant
BMV agricultural land	Very high and high	Temporary loss of BMV land	Moderate to minor adverse	Significant	None - Impact is temporary and BMV land required temporarily will be reinstated by the end of the construction phase	Minor adverse	Not Significant
		Permanent loss of BMV land	Major to moderate adverse	Significant	None	Major to moderate adverse	Significant

**Table 6.15 Summary of residual agriculture and soil effects (Operation and Maintenance)**

Receptor	Sensitivity	Description of Impact	Likely Significant Effect		Additional Mitigation Measures	Residual Effect	
			Magnitude	Significance		Magnitude	Significance
Soils	Very high, high and medium	Temporary impacts to soil function and disruption to soil ecosystem services	Minor adverse	Not significant	None	Minor adverse	Not significant
BMV agricultural land	Very high and high	Temporary loss of BMV land	Minor adverse	Not significant	None	Minor adverse	Not significant

**Table 6.16 Summary of residual agriculture and soil effects (Decommissioning)**

Receptor	Sensitivity	Description of Impact	Likely Significant Effect		Additional Mitigation Measures	Residual Effect	
			Magnitude	Significance		Magnitude	Significance
Soils	Very high, high and medium	Temporary impacts to soil function and disruption to soil ecosystem services	Moderate to minor adverse	Significant	None - Impact is temporary and soils will be reinstated / re-used by the end of the decommissioning phase	Moderate to Minor adverse	Significant
	Very high, high and medium	Reinstatement of soils in areas where	Major to moderate beneficial	Significant	None	Major to moderate beneficial	Significant

Receptor	Sensitivity	Description of Impact	Likely Significant Effect		Additional Mitigation Measures	Residual Effect	
			Magnitude	Significance		Magnitude	Significance
		infrastructure has been decommissioned (should this be undertaken)					
BMV agricultural land	Very high and high	Temporary loss of BMV land	Moderate to minor adverse	Significant	None – impact is temporary and BMV land required temporarily will be reinstated / re-used by the end of the decommissioning phase	Minor adverse	Not Significant
		Permanent reinstatement of BMV land	Moderate to major beneficial	Significant	None	Moderate to major beneficial	Significant

- 6.11.2 Impacts on agriculture and soil receptors result from the temporary disturbance of soils and temporary removal of BMV land from agricultural production, and from the permanent land take required for the Proposed Project's infrastructure.
- 6.11.3 Whilst the temporary effects during construction are significant, the majority of the land required would be reinstated to the pre-construction condition by the end of the construction phase in accordance with the measures set out in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**. In addition, soil resources from the footprint of the permanent infrastructure would be re-used within the Proposed Project where practicable, enabling an associated range of soil functions to continue.
- 6.11.4 The permanent loss of BMV land during construction would be a significant effect. There would, however, be no significant effects during the operation and maintenance phase as associated works are likely to be small-scale and short-term.
- 6.11.5 The effects during decommissioning would be similar to those identified during the construction phase. However, the decommissioning would allow for the reinstatement of the land within the footprint of the decommissioned infrastructure, which would be a significant beneficial effect.

## 6.12 Sensitivity Testing

- 6.12.1 The baseline is not considered likely to change in the short-term and as such it is not considered that a delay of up to five years for construction to commence would have an impact on the assessment as presented in this chapter.

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