

Planning Proof of Evidence – Appendices

In respect of Land at Grove Farm and land East of the Railway Line, Bentley, Suffolk.

Construction of a Solar Farm (up to 40MW export capacity) with ancillary infrastructure and cabling, DNO substation, customer substation and construction of new and altered accesses.

On behalf of Green Switch Capital Ltd

Date: December 2025 | Pegasus Ref: P25-O480

Appeal Ref: APP/D3505/W/25/3370515 | LPA Ref: DC/23/056656



Appendix 1 – Statement on Grid Reform by Qair



Statement on Grid Reform

Land at Grove Farm – Appeal Ref.

APP/D3505/W/25/3370515

This Statement has been prepared by Qair Renewables UK to provide an update on Grid Reform being undertaken by National Energy System Operator (NESO) along with an update on the proposed grid connection at Grove Farm in Bentley. As the Grid Reform is ongoing, the information provided in this Statement is accurate at the time of writing but is subject to change before the commencement of the Public Inquiry.

The purpose of the Grid Reform is to replace the traditional process of “first come, first served” with a new process of “first ready and needed, first connect”. As the wording stipulates, the new process gives favour for grid connections to projects that are ‘shovel-ready’ and able to connect to the grid first allowing for an earlier contribution to the Government’s Net Zero targets. It also has the benefit of removing so called “zombie projects” which have blocked the grid queue. The Grid Reform is summarised in figure 1.

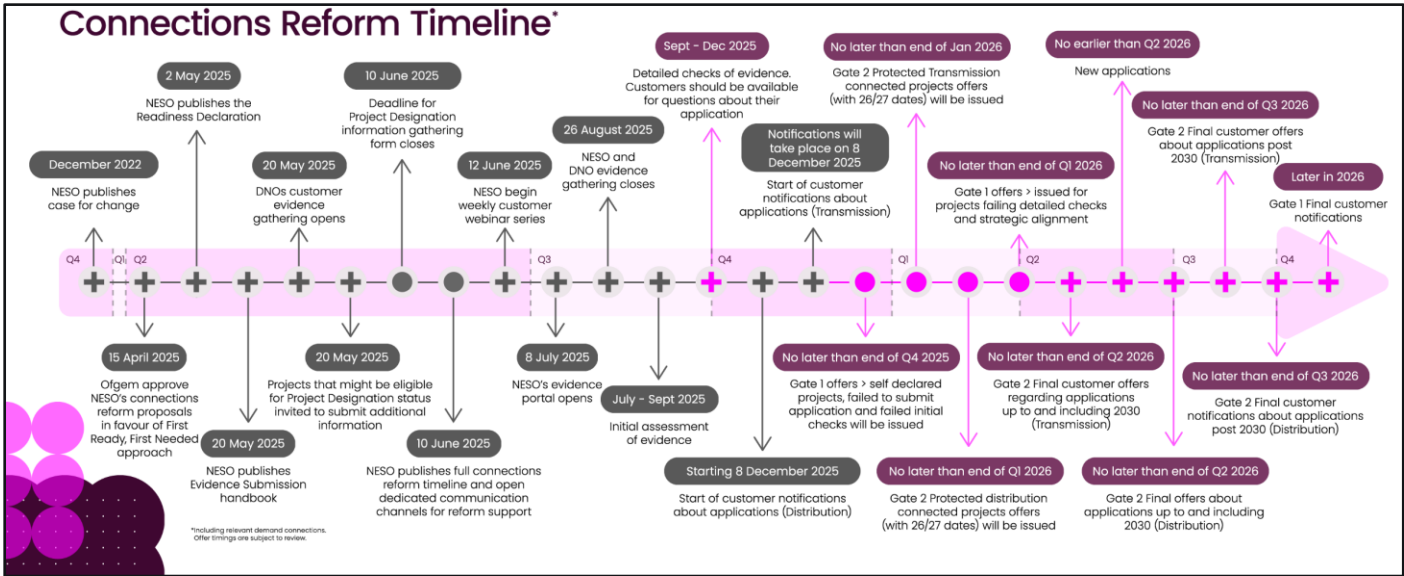


Figure 1 – NESO Connections Reform Timeline

As part of the reform Qair UK have had to provide evidence to the District Network Operator (DNO) with proof of readiness, this includes evidence of landownership/ land control and progress obtaining relevant planning consents. The DNO confirmed that the information provided passed their gate check system as outlined in figure 2.

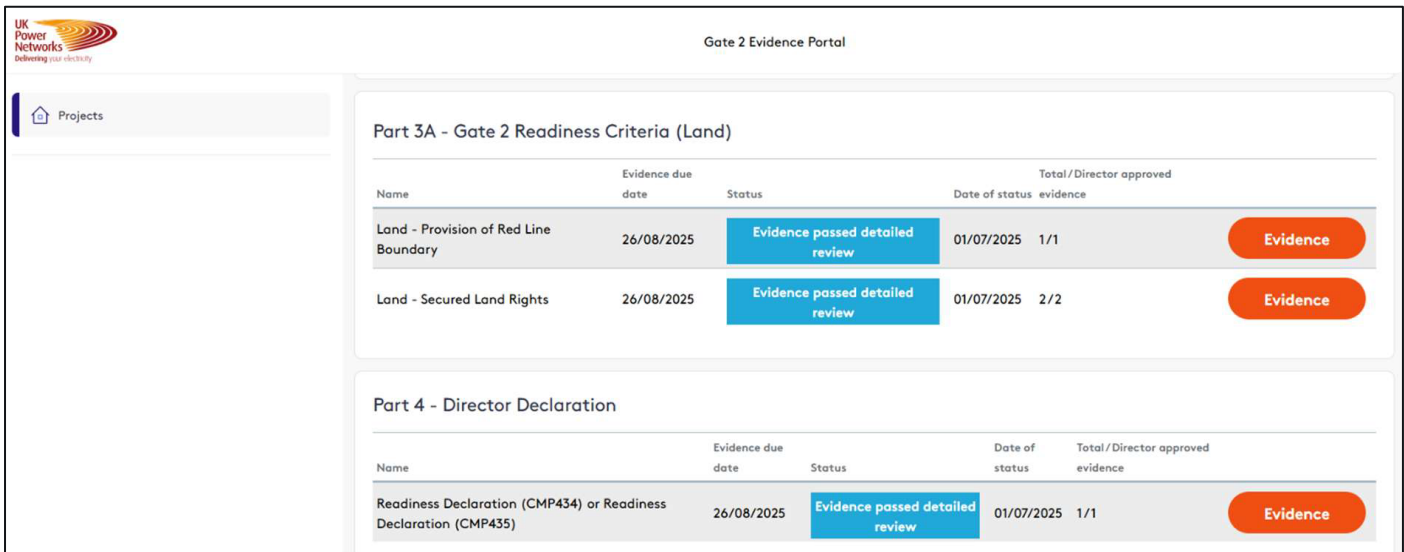


Figure 2 – Confirmation of Passing Evidence Criteria

The provisional connection date for the proposed solar farm before the grid reform was March 2028 therefore contributing to the targets set out in Clean Power 2030.

The Grid Reform set out a 'gate' system for the allocation of projects. Gate 1 is for projects that have not been allocated a firm connection date and gate 2 is for projects to be connected before 2035 with a connection date (albeit this is flexible). This gate system has allocated projects based off their readiness to connect and their need in the system. A project's allocation within the gate system is not fixed and can be moved subject to a change in the project's readiness. As an example, upon receipt of planning consent projects will usually advance in the queue and will be offered a much earlier connection date. This has been evident with 3 other projects that Qair UK has been running on a similar programme to Grove. In all 3 instances they have obtained planning permission and all 3 projects are confirmed as being within Gate 2 by NESO.

Regarding the Grove Farm Solar Project, the DNO have confirmed that the site has been placed in gate 1 principally because the project doesn't have planning consent following the refusal of a planning application by Babergh District Council. Should the forthcoming planning appeal be determined positively the DNO have confirmed that they will re-review the evidence provided (in Q2 2026) and have accepted that the project can enter Gate 2. It is understood that, at this time the project would have certainty to enter gate 2 as it will be 'ready to connect' with all the relevant permissions and legal agreements. Therefore, the refusal of the planning application by the Local Planning Authority is the sole reason for the site slipping down the grid connections queue. If the application for planning permission had been granted then NESO will have honoured the original connection date of March 2028.

In summary, grid connection dates are not fixed and they are highly dependent upon their readiness as outlined in the gate check criteria. In the absence of planning permission in this DNO area, all renewable energy projects are unlikely to achieve gate 2 status. Regardless, should the proposal receive planning consent following the forthcoming appeal then there is a high likelihood that it will significantly advance in the queue and obtain gate 2 status. It is firmly believed that upon the receipt of planning permission the project is deliverable before 2030 and therefore could make a significant contribution to CP30. The fact that the site retains a grid connection should in any case, be afforded positive weight in the determination of this appeal as the proposal will contribute to a net zero future.

Liam Kelly (Chief Operating Officer)





Appendix 2 – Agricultural Statement by Kernon Countryside Consultants Ltd



**LAND AT GROVE FARM AND EAST OF THE
RAILWAY, BENTLEY
AGRICULTURAL STATEMENT ON BEHALF OF
THE APPELLANT**

By Tony Kernon BSc(Hons), MRICS, FBIAC

LPA Reference: DC/23/05656

Pins Reference: APP/D3505/W/25/3370515

December 2025

1 Introduction

- 1.1 This Agricultural Statement has been prepared by Tony Kernon of Kernon Countryside Consultants Ltd. I am a Chartered Surveyor and a Fellow of the British Institute of Agricultural Consultants (from January 2026 to be the Society of Agriculture). I have 38 years' experience in assessing the effects of development proposals on agricultural land and assets. I have extensive experience of solar farm development and soil and land quality issues.
- 1.2 The Council has not raised agricultural land as a reason for refusal.
- 1.3 The agricultural land quality is referred to in paragraph 2.2 of the Officer's report, and is considered in paragraph 3.9 which notes that grazing uses could go some way to addressing concerns about the loss of land for agricultural use.
- 1.4 The Council raises no issue with the use of agricultural land in its Statement of Case (October 2025). Therefore agricultural issues form no part of the Council's reasons for refusing the consent.

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Consultants - **Ellie Clark** BSc(Hons) MBIAC **Dan Miller** BSc(Hons)*

1.5 The Rule 6 Party Bentley Parish Council and Stop Grove Farm Solar (the R6P) do, however, raise the **“taking out of productive use of a large area of good quality, productive arable land”** as the sixth of nine objections the R6P wishes to pursue.

1.6 Accordingly this Statement:

- describes the land quality in section 3, and explains how land quality is not affected;
- sets out the land use and food production issues in context in section 4.

1.7 Section 2 begins with a synopsis of relevant policy and how it might change under the NPPF consultation (which will post-date the likely decision of this appeal).

2 Planning Policy Synopsis

2.1 The National Planning Policy Framework (NPPF, December 2024) sets out in paragraph 187 that planning policies and decisions should contribute to and enhance the local environment by, inter alia, recognising **“the economic and other benefits of the best and most versatile agricultural land”**. Footnote 65, to the plan making paragraph 188, notes that where significant development of agricultural land is demonstrated to be necessary, poorer quality land should be used in preference.

2.2 Babergh and Suffolk Joint Local Plan (2023) policy CP15 notes that where development needs to take place on greenfield land, avoiding the best and most versatile (BMV) land should be prioritised.

2.3 Neither policy places a bar on loss of BMV agricultural land. As I will identify later, no party is arguing that the agricultural land will be lost in this case. Neither the NPPF nor the Local Plan places any restriction or applies any policy to the use of agricultural land, BMV or otherwise.

2.4 Consultation on revisions to the NPPF were published on 16th December 2025. Whilst these carry no particular weight, for completeness the proposed changes do not affect the views expressed in this Statement. The changes of relevance are:

- N1 (1) (c) avoiding the use of BMV land when poorer quality land is available;
- N2 (1) (b) using poorer quality land in preference where significant development is demonstrated to be necessary.

3 The Land Quality and Effects

3.1 The land quality is described in the Agricultural Land Classification (ALC) by Soil Environment Services, at PDAS Appendix K.

- 3.2 The land quality of the whole site includes 9 ha of Grade 2, 24 ha of Grade 3a and 17 ha of Grade 3b. It is recognised that the land quality will not be lost or downgraded:
- Natural England raised no objection/comment (5 March 2024);
 - this forms no part of the Council's case;
 - the R6P at 3.16 note that "**whilst it is acknowledged that the Appeal development should it be approved, would not result in the permanent loss of land.....**".
- 3.3 As described in the PDAS, at section 5.10, the Appellants have not used most of the Grade 2 at the western edge of the site. The reduced area now comprises 7.1% Grade 2, 55.7% Grade 3a and 37.2% Grade 3b. Therefore the Appellants reduced the use of the highest quality land, taking approximately 6 ha of Grade 2 from the site (PDAS, 6.4.26).
- 3.4 Solar PV arrays involve the insertion of narrow piles into the soil, which do not affect the land quality. Soils are generally not affected, and adherence to good soil management practices will result in no significant effect on soils. The ALC report identified the soils as coarse loamy and sandy soils, which being dry soils are resilient to being moved, and construction works and the fixed infrastructure (eg roads) will not downgrade land and can be restored fully on decommissioning.
- 3.5 Multiple appeal decisions could be referred to, but as this is not a point of disagreement between any of the parties, they do not need to be referenced.
- 3.6 As a note, the ALC Methodology Guidelines were updated in December 2025 for the first time since a minor edit in 1996. These guidelines do not alter the principal methodology, and do not therefore affect the land quality results relied upon for the appeal.

4 Land-use and Food Production Considerations

- 4.1 The R6P's Statement of Case at 3.16 states, inter alia, that whilst it is acknowledged that the appeal development would not lead to the permanent loss of the land, "**it would take it out of food production for 40 years. This is considered to be a significant period of time for the loss of best and most versatile land and must carry weight in the decision making process**". Further comments are contained in the appendix.
- 4.2 The matter, the R6P's Statement of Case notes, is one of weight in the planning balance. I therefore set out briefly some context so that the determining authority can better decide the weight to be ascribed to this issue.

- 4.3 I consider:
- (i) food security concerns/statements;
 - (ii) the productivity implications of the development;
 - (iii) the weight accorded in other cases.
- 4.4 The PDAS at sections 6.4.25 to 6.4.36 addresses the use of agricultural land, food production and compliance with policy LP15, and I do not repeat but supplement that analysis.
- 4.5 This Statement also proceeds on the basis that it is not disputed by any party that there is no requirement, obligation or policy to require land to be farmed, to be farmed at any particular intensity, or to be farmed for food rather than industrial products, energy crops etc.
- 4.6 **Food Security Concerns.** Government does not identify a food security concern in this country. The UK Food Security Report 2024 (December 2024) summary concluded that:
- 1) global food availability remains stable. Climate change, nature loss and water insecurity pose the biggest risks;
 - 2) UK food sources are broadly stable. The greatest risk to UK food production is the decline in natural capital.
- 4.7 The Solar Roadmap (DESNZ, June 2025) notes on page 21 that **“the biggest risk to food security and the natural environment is the climate and nature crises. That is why it is important that the UK takes a leadership role including by rapidly expanding solar power generation”**. In the “Solar Misconceptions” attachment, against the “solar is a threat to food security” comment, the Solar Roadmap notes: **“The biggest threat to food security is crop failure due to climate change and solar farms are helping to tackle this directly”**.
- 4.8 **Productivity Implications.** The land is in arable uses. If we assumed a crop of winter wheat across all the land, the BMV part of the site might yield more than the non-BMV land. If that was to be quantified by, for example, the difference between average and high yields in a respected agricultural business budgeting book such as John Nix, the 33 ha of BMV (the whole of the area surveyed) could in theory generate an extra yield of 40 tonnes (33 ha x 1.2 t/ha). For the reduced site this would drop to 32.4 tonnes. UK cereal production is about 20 million tonnes. Therefore preventing the deployment of solar panels on the 33 ha (or 27 ha) of BMV and requiring those panels to go on non-BMV land elsewhere, would result in an incremental benefit of 32-40 tonnes per annum, which is negligible.

4.9 To put the production and land use in another context, at 1 June 2025 there were 444,000 ha of arable land not in food production but in biodiversity uses. That is about 11% of arable land (excluding temporary grassland). The deployment of solar panels to meet national targets will need around 90,000 ha (1% of the utilised agricultural land of England).

4.10 **Weight Accorded Elsewhere.** There are many appeals that could be referred to. Of relevance given that it is arable land, of a similar magnitude, and recent is APP/R3705/W/24/3349391, Fillongley. At paragraph 183 the Inspector concluded that the use of 61 ha of mostly BMV (paras 139 and 150) carries neither weight in favour nor weight against the grant of planning permission.

5 Conclusion

5.1 The concern raised about the effect on food production is not a concern that can be supported by evidence, and should not weigh against the proposal.



Appendix 3 – Economic Impact Note by Pegasus

Economic Impact Note.

Project name: Grove Solar Farm
Author(s): CD & RC
Date: 22 December 2025
Project number: P25-0480

Introduction

This note has been produced on behalf of Green Switch Capital Ltd ("The Appellant") to highlight the potential economic benefits associated with a solar farm (up to 40MW export capacity) on land at Grove Farm in Babergh local authority.

Baseline

A review of the local economy highlights the following points in relation to the Babergh labour market and households living in fuel poverty.

- **Employment¹:** Babergh saw an increase in employment between 2015 and 2024 of 3%, representing 1,000 additional jobs. This jobs growth was substantially lower than regional and national increases of 9.7% and 9.6% over the same timeframe respectively. The Proposed Development will create new jobs in the area during both the construction and operational phase, helping to support labour market growth in Babergh.
- **Supporting the Construction Sector²:** As of 2024, the construction sector in Babergh supported around 5.9% of total employment in the District, which equates to 2,000 jobs. The proportion of employment supported by construction in Babergh is above the national figure (5%), but below the regional figure (6.6%). This suggests that although the sector is important relative to national standards, there is still potential to boost employment in line with regional figures. The Proposed Development will provide new employment opportunities within Babergh's construction sector.
- **Business Growth³:** As of 2025, there were 4,690 businesses within Babergh. This figure increased by 3.2% between 2015 and 2025, which is substantially below the regional and national comparators. The Proposed Development could aid in boosting business growth within the local economy by helping to lower energy costs, thus reducing a significant barrier for many new and emerging businesses.
- **Fuel Poverty in Babergh:** Data show that as of 2023, 11.4% of households within Babergh were experiencing fuel poverty, which represents 4,771 total households⁴. This proportion is in line

¹ Employment analysis based on data from the Business Register & Employment Survey (BRES), published by the Office for National Statistics (ONS).

² Construction jobs sourced from the ONS BRES.

³ Business numbers sourced from ONS UK Business Count.

⁴ Fuel poverty data sourced from: <https://www.gov.uk/government/collections/fuel-poverty-statistics>

with the national figure but is higher than the regional figure. The Proposed Development could help to reduce the number of households experiencing fuel poverty within Babergh.

Impacts

Construction phase

- **Direct and indirect construction-related employment:** The Proposed Development will support an estimated **117⁵ temporary roles on-site and in the wider economy** (up to 50 on-site jobs and 96 supply chain jobs) over the 32-week build programme (and a similar job numbers during decommissioning of the project).
- **Construction worker spend:** A proportion of construction workers are likely to stay in the local area during construction and will spend money on accommodation and food and drink. The build phase is expected to last 32 weeks, and up to 35 jobs supported on-site at the peak of the programme could be taken by workers from outside Babergh.⁶ The number of workers on site is expected to fluctuate across the build phase⁷. Assuming each worker spends around £100⁸ per day (consisting of around £25 on food and drink and £75 on accommodation), and there are 24⁹ working days in a month, it is estimated that during the construction phase, the construction employees from outside the local area could spend around **£0.5million at local businesses** across the two-year period. This spend will help support the 645¹⁰ accommodation, food & drink, retail, and arts, entertainment, recreation & other services businesses that operate within Babergh.
- **Contribution of construction phase to economic output:** Up to **£6.1million of gross value added (GVA)** could be generated during the 32-week construction period.

Operational phase

- **Operational phase employment:** Based on past experience of assessments for solar farms, it is estimated that the scheme will support up to **5 full-time equivalent jobs (FTE)** once it is operational
- **Contribution of operational phase to economic output:** The GVA associated with the five FTEs is estimated to be **£7.8million (present value¹¹)** over the 40-year operational lifespan.
- **Business rates:** It is estimated the solar farm could generate around £45,300 in business rates per annum. Over the intended 40-year lifespan of the scheme, it is estimated that business rates generated could total around **£1.0million** (present value). The actual figure will be determined by the local authority following construction.

⁵ This is based on figures provided in the Transport Statement, along with a multiplier of 2.33 (for every 1 direct job, a further 1.33 jobs are supported indirectly and via induced effects).

⁶ 70% of the overall peak of 50 on-site jobs.

⁷ Assumptions based on a combination of professional expertise and experience from past schemes.

⁸ Based on a conservative estimate using a combination of professional expertise and experience from past schemes.

⁹ This assumption is based on information provided in the Transport Statement, which assumes a 6-day working week.

¹⁰ Based on 2025 data from the ONS UK Business Count.

¹¹ Where future benefits are calculated, they have been discounted to produce a present value. This is the discounted value of a stream of either future costs or benefits. A standard discount rate is used to convert all costs and benefits to present values. Using the Treasury's Green Book, the recommended discount rate is 3.5% up to year 30. For year 31 onwards, the recommended discount rate is 3.0%.



Appendix 4 – Letter from Mr D Baker of Falstaff Manor, Bentley

Falstaff Manor
Bentley
Ipswich
Suffolk
IP9 2BU

18.12.2025

To whom it may concern,

I have farmed this land for nearly 64 years. Firstly, with my father and today, with my son and grandson.

For most of those years, farming income has sustained us and allowed us to live and expand our farm. During the eighties and nineties, we were able to plant woodland (approximately 10,000 trees) dig ponds and encourage habitat for wildlife. These environmental projects have been focused on our Grade 4 land, which is unsuitable for cereal production. The Suffolk Barn Owl Trust has monitored our farm for 15 years and described it as having a “*consistently high number of owlets*”.

However, over the last twenty years or so, agriculture has experienced big changes. The lower farm income has prevented us from spending money on these types of projects.

Farm profitability has dropped to an unsustainable level due to a combination of factors including - climate change, higher input costs, low world grain prices and the removal of farm subsidies which supported us. These factors have all combined to have a serious effect on our cash flow and profitability.

In September 2025 the Met Office confirmed that “***Suffolk has experienced its hottest summer since records began, according to new figures just released by the Met Office.***” (www.eastsuffolk.one/news/local-news/downpours-follow-suffolk-warmest-summer-on-record/). This was preceded by an exceptionally sunny and dry Spring, (www.eadt.co.uk/news/25209082.sunniest-spring-record-low-rainfall-suffolk/). The farm made a loss from cropping in 2025.

Budget projections of cash flow into 2026, and perhaps 2027, do not look promising for a positive result based on today's world grain price and the cost of our inputs. Diversification is critical to the future of farming and to bringing stability to our income, and one that allows us to then subsidize our food production on the rest of the farm in bad years.

The solar site is not 'best and most versatile land' as has been reported. It is exactly the grade of land the Government is requiring for solar sites: "**less productive farmland**." It means that this land can produce a productive 'crop of electricity' every year, particularly in the driest and hottest of summers when traditional farm crops would suffer from drought.

For us, this renewable energy scheme would create the opportunity to continue our sheep production. Whilst in Suffolk, the arable crops are fragile with the changing climate, grazing land is more robust. This means the solar panel setup will allow us to create at least 116 acres of new winter grazing land. We have had sheep on this farm every winter and the extra flexibility of this grazing will help this enterprise to grow.

The addition of the solar rental would add a significant figure to our total yearly farm income. Solar is **medium term, guaranteed and will enable us to be a viable farm business**. Our family would like to continue farming for many more years to come, and without having to rely on the only support on offer at the present time, which is the government's sustainable farming incentive scheme (SFI).

This scheme offers payments to farmers for taking land out of food production and into environmental schemes. SFI is **not long term, not guaranteed, nor will it sustain farms into the future** compared to the solar project.

As farmers, we are only stewards of the land during our lifetime, and I feel satisfied that during the forty years of this solar farm project, that the land will have been used productively and will be left in a better state, both environmentally and agriculturally, afterwards.

In conclusion, the solar would enable this family farm to continue producing food under its own terms, and simultaneously, enable us to invest and further improve the biodiversity of the farm.

Yours sincerely,

Donald Baker

A handwritten signature in black ink that reads "D. Baker". The letters are cursive and slightly slanted to the right.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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