

Detailed Agenda for Issue Specific Hearing 3 – Other Environmental Matters including: Principle and nature of the Development, Air Quality and Human Health, Socio-economics and Land Use, Water Resources, Flood Risk and Drainage

AGENDA HEADING	AGENDA ITEM	NATURAL ENGLAND'S COMMENTS
Welcome, introductions and arrangements for the Hearing		No comment
2. Principle and nature of the development	a) Implications for the proposed development of an eventual recommendation to delete a part or parts of the order limits	No comment
	b) Benefit to local community from reduced energy costs	No comment
3. Socio-economic and land use	a.i.) Agricultural land classification: adequacy of agricultural land classification surveys, relevance of irrigation needs	<p>Additional information was submitted about soil management in the updated CEMP submitted at deadline 2 [REP2 - 027] with regards to soil handling. While many of these changes were welcomed, Natural England has advised on additional inclusions that are required. See Section 3 of our letter at deadline 3 [REP3 - 028].</p> <p>Natural England has raised concerns about the ability to restore soil to its original grade after soil reinstatement, including the mixing of topsoil with chalk. From the documents submitted so far, it is unclear whether this mixing is still proposed and, if so, how restoration will be achieved.</p> <p>Natural England maintains that detailed soil and ALC data along the cabling routes is required to inform a baseline for ALC grade as well as soil properties to inform the EIA, soil handling and reinstatement criteria.</p>

		<p>Natural England maintains that information on soil nutrient status and pH should be collected to inform which vegetation the soil can most effectively support. This will allow soils to be sustainably used and managed over the operational phase.</p> <p>Natural England advises that it is currently unknown what the overall impact of a temporary solar development will have on soil health, and it is not possible to conclude that it will have a beneficial impact on the soil resource during operation.</p> <p>In addition to the issues raised in our Relevant Representations [RR - 1291] and Written Representations [REP2 - 090], in a meeting between our soils specialist and Sunnica's consultants, we raised some concerns about the ALC soil survey that had been carried out. These were:</p> <ul style="list-style-type: none"> • Discrepancies between the ALC grades identified by the soil core data in Appendix 12B [APP-115] and the mapped ALC Grades in Figures 12-2 and 12-3 [APP-238 and APP-239]. • Lack of discussion of assumptions and approach for determining droughtiness • Lack of discussion with regards to soil types and whether the soil pits have been located to reflect the distribution of soil types. It is not clear as to whether the Soil Pit data has been used in
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		<p>verifying soil structural and stone descriptions for the wider area.</p> <p>The project soil specialist has provided clear justifications to their assumptions in our meetings, and have demonstrated their competence in undertaking and delivering an ALC assessment. Therefore, if the same approach is followed for the outstanding ALC surveys, this would fulfil our requirement. We have requested that the Applicant submits a technical note to the examination outlining these justifications to allow scrutiny from both interested parties and PINs..</p>
	a.ii.) Agricultural land classification: whether assessment of best and most versatile (BMV) agricultural land accords with planning policy	<p>Our advice remains that, if temporary as described, the development is unlikely to lead to significant permanent loss of BMV agricultural land, subject to the following:</p> <ul style="list-style-type: none"> • The development has a maximum operational life of 40 years • The land is returned to agricultural use of the baseline ALC Grade at the end of this period • Low disturbance methods are used to install the photovoltaic panels • A decommissioning and re-instatement plan is prepared and submitted prior to the panels being removed
	b) The effects of the proposed development on the local community and economy	No comment
4. Air quality and human health	a.i.) BESS safety: fire risk, potential effects and mitigation	No comment

	a.ii.) BESS safety: explosion and effects	No comment
	a.iii.) BESS safety: health implications	No comment
	b) Emergency planning including evacuation plans	No comment
5. Water resources, flood risk and drainage	a) Adequacy of flood risk assessment	No comment
	b) Design of Sustainable Drainage Systems (SuDS) features, floodplain compensation	No comment
	c) Residual flood risk at Burwell Substation	No comment
	d) Solar panels in FZ3	No comment
6. Public rights of way	a) Temporary closure and restoration	Natural England has raised concerns about the impact of the proposed closures on people's connection with nature. These are outlined in more detail in our Relevant Representations [RR-1291 paragraph 4.8.2]. Natural England recognises that these closures are required for safety and will be temporary. However, concerns remain about the impacts.
	b) permissive paths	No comment
7. Next Steps		No comment