

Patrick Stephenson		
Re4 -032 4.1.7 e Rep 3a p563 Rep 5 095 2.9.1 Rep 5-065 5.3 Deadline 7 applicants' response to other parties' deadline 6 p61 soils Re4 -032 4.1.7 e Rep 4-032 4.1.7e Re4 -032 4.1.7 e Re4 -032 4.1.7 e Rep 4-032 4.1.7e Rep 3a p 563, Rep 4-032 4.1.7 f Rep 4-032 4.1.7e Rep 3a p 563	No drought calculations No moisture deficits No assessment of stones >2mm No data on particle size density No lab analysis on sand fractions Land outside site Does not follow ALC guidelines	Full lab analysis was done at the time of the auger borings (appendix1) for soil fractions Land was outside the site as permission to enter was not given by the land owners or Sunnica
Rep 3a p566 rep 6 065 2.9.1	ALC work comprises work from 3 teams including MAFF and RAC, findings on ALC grade concur	The MAFF findings do not concur with 55% as BMV (App-115)
Rep 5 065 2.9.1	The claim by Lucy Frazer MP that the presence of BMV is 'significantly contested' is based upon the flawed assessment work of Patrick Stephenson and the desk top work of RAC that contradicts their own previous site assessment work. Paragraph 3.2.1 - The Sunnica ALC grading does not contradict the post 1988 ALC shown on Magic.gov.uk. It is the same grading but with the no longer supportable irrigation upgrade removed	The work of RAC does not in any way contradict their earlier assessment of an area known to have mineral deposits. Patrick Stephenson's work is consistent with NE ALC mapping. The ALC work does contradict the post 1988 ALC shown on Magic Maps as there was no irrigation in the area North of La Hogue but DBSC still downgraded the land in the PEIR.
Re5 065 3.1	Differences between auger borings and pits in terms of loamy sand or sandy loam top soil	Pits were not dug in exactly the same locations as the auger borings and classifications were often very borderline between categories
Deadline 7 applicants' response to other parties' deadline 6 p59	LRA comments do not apply equally to Baird report Applicant presented detailed ALC assessment including record of characteristics	No moisture Balance calculations shown in DBSC work

	required to make an assessment of drought limitation.	Stones recorded in auger borings differ markedly from pit analysis. No photos of auger borings or pits at all
Deadline 7 applicants' response to other parties' deadline 6 p61 soils	Patrick Stephenson's work reveals inexperience in ALC assessment	Patrick Stephenson is highly regarded and experienced as demonstrated by his CV and his conclusions are consistent with NE AC mapping for the area unlike DBSC.

RAC		
Rep 4-032 4.1.7 a	RAC give considerable space to cropping history and yield which is not relevant to ALC reference to historic place names also irrelevant	Cropping and yields are mentioned in the ALC guidelines and are something which should be taken into account by planners
Rep 4-032 4.1.7 c	Reference to NE Likelihood of BMV, map is for strategic planning purposes only cannot substitute for assessment	Whilst the map is for strategic planning it is well researched and accepted as a planning tool. It is extremely surprising that APP 115 differs to such a degree, the chances of <1% of the land being BMV calls into question the use of that map for any planning use.
Rep 4-032 4.1.7	Soil association maps are strategic scale only	As above the 1:63360 is at a scale of 1" to 1 mile.
Rep4 -0.32 4.1.8 b	Previous RAC survey land limited by droughtiness	This was known to be poor land with mineral deposits. RAC findings were consistent with the NE and ALC maps
Rep4 -0.32 4.1.8 d	RAC survey contradicts claims made at hearing Grade 3b/4 land unlikely to grow high value crops but noted in their ALC that land was growing potatoes, onions, parsnips but classified as Grade 4	RAC did not take into account irrigation and their work in no way concurs with the MAFF survey. Only 3.3ha which RAC surveyed are in the Sunnica site. As shown by the NE maps this area is not typical of the remainder of the site.
Rep4 -0.32 4.1.8 e	Claims by RAC on behalf of SNTS incompatible with previous work and should be dismissed	It is not incompatible, please see comments above. SNTS work concurs entirely with the MAFF survey which DBSC work does not.

Rep4 -0.32	RAC reference abstraction licences – EA say no new consumptive licences will be granted	Several of the farmers involved have winter fill reservoirs which are actively encouraged by the EA
Rep4 -0.32 Technical Note 2.1.8 Rep 4-036 p 81 para 2 Rep 4-036 p 81 para 3	Missing plots – sample point by RAC on sand and gravel quarry support view that land is part of the surrounding extensive Grade 4 land	The area surveyed for the quarry is very small and not representative
Rep 4-036 p 72 para 3 and para 4, P84 para 1 Rep 5 -056 2.9.1	3 different specialists have provided the ALC grade within the Sunnica sites, there is no discrepancy between the findings of the 3 teams as to soil characteristics, ALC grade and limitations to grade. Concerns over impartiality of RAC	MAFF survey found 55% of land was BMV RAC are a highly respected body who value their professional integrity, to suggest otherwise is false. See above
Rep-0562.9.1	The Applicant does not consider it appropriate to repeat survey work in circumstances where there is no legitimate issue raised with that work. The submissions which seek further survey work are reliant upon the assessment undertaken by RAC (as instructed by SNTS). However, as previously explained, RAC's current assessment conclusions and claims (made on behalf of SNTS and relied upon by other interested parties) are entirely contradicted and not supported by their own previous site assessment of ALC within the Sites (which previous assessment aligns with the methodology and outcomes with the survey work undertaken on the Sites by two other specialists).	A number of legitimate concerns have been raised by the two MP's and four councils. SNTS has offered a way to resolve this which has been refused by the applicant.
Deadline 7 applicants' response to other parties' deadline 6 p59	All data needed to calculate drought limitation is provided NE broadly agrees with ALC gradings presented	Data is not provided and "allowances" made by the applicant not explained NE are still requesting clarification of applicant's calculations

Yield

Rep 4-036 p 79 para 1 Rep4 -0.32 4.1.7 a Rep 4-036 p 78 para 2 Rep 4-036 p 79 para 1 Rep 5-065 2.9.1	Approach adopted by SNTS allowing cropping history to influence ALC is not consistent with MAFF guidance	Food sustainability is increasingly a cause for concern, the Applicant's refusal to accept this as a consideration has not been justified

Pits

Rep4 -0.32 4.1.6 a Rep4 -0.32 4.1.7 b Rep4 -0.32 Technical note 2.1.6 Rep 3a p536 para 3 Deadline 7 applicants' response to other parties deadline 6	Archaeological trenches used to illustrate shallow soil	Archaeological trenches used to illustrate shallow soil, not typical of archaeological trenches shown in APP 075 and APP076 Claim that pits illustrate soil types within site is untrue, there are 10 soil types across the site No map or photographs of the pits are provided as required by BSSS guidelines
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1988 guidelines

Rep4 -0.32 4.1.7 a Rep4 -0.32 NE guidance 6 Rep4 -0.32 NE guidance 8	ALC defined by physical characteristics cropping and yield not to be used to grade land 1988 field survey data is the most reliable source of information on land quality	1988 surveys do not concur with the Applicants survey. Yields and cropping are alluded to in the 1988 guidelines.
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Access

Rep4 -0.32 4.1.10 Rep 4-036 p 84 para 3	Access prevented by landowners as Applicant does not control site	Request to landowners were met with refusal as Sunnica would not allow access.
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Irrigation

Rep4 -0.32 4.1.8 d (ii) Rep4 -0.32 4.1.9 d Rep 3a p562	RAC claim an increase should be applied where irrigation is available NE correspondence makes clear access to irrigation water should not be used to raise ALC grade of drought limited land	The applicant has been unable to show any document changing the 1988 guidelines. Indeed, a review by the Welsh Government concluded that the Guidelines were still policy
Answers to 3 rd written questions	<p>Much of the land within the Sites is currently in arable agricultural use which is heavily irrigated The cessation of these activities also has the potential to improve water quality due to the reduction in nitrate infiltrating the ground and entering watercourses</p> <p>The proposed grassland cover and the suspension of cultivation will provide a number of benefits to soil health including fertility, moisture retention and structural stability.</p>	Lee Brook is classified as good Physiochemical status; agriculture has no adverse effects. Phosphate does show as an issue but is likely to be exacerbated by the construction and also potential soil run off where panels arrays run downhill.

NE

Rep 4-036 p 72 para 2	Ne quoted as saying soil specialist has provided clear justifications to their assumptions	Justification of assumptions made have not been published and NE are still awaiting further details.
Rep 4-036 p 72 para 3 Rep4-139 2.2 Rep 5-056 2.9.2	Cable route to be assessed post consent NE requires detailed soil and ALC data for cable route	The cable route will cross a large area of predicted BMV land, there is no reason why an assessment could not be made.
Rep 4-036 p 73 para 1	DEFRA SP08016 supports increase in OM	The Applicant has not been able to provide any other evidence to support this view
Rep2-090 5.3 Rep2-090 4.1.6.4, 4.1.6.9 p12 Rep2-090 4.1.6.4, p13	Requested further information from applicant with regards to the ALC surveys carried out Concerns about methodology used in ALC surveys and request additional information	NE have repeatedly requested further information which has not been forthcoming

Rep2-090 4.1.6.4.3 p14	Requested soil nutrient status and pH be carried out. Soil resource information should be collected at the application stage using ALC survey data plus a few additional lab analyses so that this can influence design e.g., identifying low nutrient soils and soils suitable for net gain habitat creation applicant response was it had not been collected as did not influence ALC grade	Still no evidence that this has been done. Sampling close to the site suggests P levels are high which would impact on the ability to establish native grasses on the site
Rep2-090 4.1.6.1 p15	Had requested RAC land be resurveyed but applicant provided justification	No evidence as to what the justification was
Rep 3a 035 5.25 p560 para 1 and 2	The results of the 3 separate surveying organisations are consistent	The 3 surveys are not consistent
Rep 4-139 2.3	Not clear impact the panels will have on carbon storage, structure and biodiversity	
Rep4-139 2.4	Irrigation can have a beneficial effect but it would be considered as another factor for planning authorities to take into account, alongside other non-land quality factors such as location, farm structure etc.	No evidence irrigation has been taken into account, or any other factors
Deadline 7 response NE	Would welcome moisture balance calculations to each point Maintains it is not possible to be certain of effects on SOM	No calculations provided to date

Rep 2-37

Q 1.0.20 Scheme has been assessed by the EIA on the basis of the worst-case parameters in all cases as described by Para 3.3.4 of the scheme description
APP -035