

From: [Michael Alder](#)
To: [Sunnica Energy Farm](#)
Subject: Request for response by 11/9/23
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UR 200031074

From Prof Mike Alder



I write in response to the request for additional information by the 11th September deadline.

My original submission was made in November 2022. In that written statement I pointed out the flaws in the ALC data and refer the inspectorate to the detail I provided.

In essence I contend that planning decisions could be based on flawed data. The existing ALC is a very historic and inaccurate way of assessing the productive capability of agricultural land, but it is accepted that for the time being it is the basis of planning decisions. On the assumption that the current ALC methodology is to be used then it should be noted that as well as myself 3 independent soil specialists suggest that 60% of the Sunnica land is BMV. Land graded 3b and 4 often responds to irrigation which is the case on the Sunnica site. The crops being grown are important for UK agriculture. I note that a number of other submissions by IPs have made the same point.

In my original submission I made the point about the cumulative effect of all the solar submissions and the overall impact this could have on UK food production and ultimately food security. This is an important point normally ignored when solar applications are considered in isolation.

I conclude there are two ways forward. First to reject the application for the solar farm on the Sunnica site primarily on the basis of the loss of valuable agricultural land. If this is not acceptable then at least an Independent analyses of the land should be carried out I understand this approach had been ruled out by the developer and the landowners which is itself indicative.

I have been involved in the application for the Longfield site which has been given approval. The inspector stated that the need for cheap green energy was in the public good and outweighed all other considerations. This sets a very dangerous precedent for UK food production and security.

Prof Mike Alder
31 August 2023