

7000 Acres

7000 Acres Response to the Gate Burton Energy Park Ltd Application on the subject of:

Agricultural Land Classification

Deadline 2 Submission – 8 August 2023

Agricultural Land Classification:

The group does not have confidence in the Agricultural Land Classification data published by Land Research Associates Ltd for the Gate Burton Energy Park Project. DEFRA assessment of Best and Most Versatile (BMV) land anticipated a moderate likelihood of BMV land in this region (i.e. 3a and above). The Land Research Associates Ltd results currently indicate that only 15% of land for GBEP is BMV or non-agricultural, which clearly helps the case for development, as the draft National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) reiterates that BMV crop land should be avoided where possible.

According to the British Society of Soil Science (BSSS) grading of land using the ALC system is not straightforward. For individual development sites this normally involves a detailed ALC field survey, according to the MAFF 1988 ALC guidelines. Proficiency in the conduct of an ALC survey requires knowledge and experience of field soil survey and the interpretation of soil, topography and climate data. There are comparatively few experts capable of carrying out ALC to a sufficient professional standard. For this reason, BSSS has published a professional competency document that outlines the qualification, knowledge, skills and experience required to carry out ALC. Skills and knowledge is required to fully meet the minimum competency standards of the foundation skills in soil investigation, description and interpretation to demonstrate the ability to investigate, sample, describe and interpret soils in the field in a consistent manner and to professional standards. This is essential to demonstrate competence in ALC and will have been gained from a number of years of field experience of soils. Island Green Power have already identified that their soils consultants were inconsistent because the “updated and final” results of the West Burton 4 data were massively revised, from 19.4% to 100% BMV and the area was removed from the development (this was also the area with most vocal local opposition).

Land Research Associates (LRA) has undertaken an ALC over the whole area. Some small areas were not surveyed, but these are not in themselves likely to change the overall scale of BMV. The survey was at a reduced scale from the 1 borehole per hectare recommended in TIN049 and the report surveyed the land at approximately 1 borehole per 2 hectares. It is normally expected that the ALC survey be undertaken in line with the MAFF 1988 guidelines and TIN049. These documents set out the precise methodology by which the ALC survey should be undertaken, with auger bore sampling at 1 hectare intervals and a suitable number of soil pits dug to determine the precise nature of the soil(s). The findings of the ALC report essentially identify over 80% of the site as Grade 3b. The majority of any BMV land is shown to be Grade 3a. As set out above the ALC report is not fully in line with the MAFF 1988 guidance, which recommends auger borings at 1 hectare intervals, and soil pits dug in representative soils types. The report is more in line with a reconnaissance survey. We recommend that a full and complete independent survey is carried out in accordance with MAFF 1988 and TIN049 guidance.

The data provided by Land Research Associates Ltd is inconsistent in the Wetness and Droughtiness Assessment. They state that the land has three main soil types: sandy soils; loamy over slowly permeable soils and heavy slowly permeable soils. They also state that the site is a combination of subgrade 3a and 3b agricultural quality, variably limited by wetness and droughtiness restrictions. They have classified 20 instances out of 316 observations where the wetness class is either I or II but

they have classified the land as grade 3b. They have further classified 60 occurrences where the land is Wetness Class III but has been classified as grade 3a. Therefore if some entries are categorised as 3a then all similar entries should also be categorised as 3a and not 3b. This would significantly change the overall classification of land to be Best and Most Valuable for the majority of the site. In order to resolve this issue an independent soil analysis needs to be conducted by a BSSS approved surveyor to establish the accurate picture with no inconsistencies in the interpretation of the results.

Aside from the sub-classification of land between 3a and 3b, there is also debate within the Government that all grade 3 land should be included in BMV.

The climatic data that has been used is based upon the Climatological Data for Agricultural Land Classification, Meteorological Office, 1989. As we all know there has been a significant change to the climate recently and as such using data that is 34 years old will not give the same results as using current data. As grading of the land is related to the climate then Land Research Associates Ltd should carry out new tests based upon current data before deciding the land classification.

National planning policy guidance on development involving agricultural land is set out in National Planning Policy Framework (NPPF), which was revised on the 20th of July 2021. The NPPF aims to provide a simplified planning framework which sets out the Government's economic, environmental and social planning policies for England. The NPPF includes policy guidance on 'Conserving and Enhancing the Natural Environment' (Section 15). Paragraph 174 (a and b) (page 50) are of relevance to this assessment of agricultural land quality and soil and state that: '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 the best and most versatile agricultural land, and of trees and woodland. Paragraph 175 of the NPPF (2021) goes on to describe that: '175. Plan 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. Footnote number 58 states that: ' 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.' Land Research Associates Ltd and Gate Burton Energy Park have failed to take into account this guidance in preparing and submitting this project proposal.