

CONCERNS AROUND ALC PROTOCOL

The Applicant's actions concerning ALC has cast significant doubt over their professionalism and methodology, and as such a second opinion must be sought for their results are to hold any weight.

Island Green Power is the Applicant for both the Cottam and the West Burton Solar Projects. The West Burton Solar Project had a particularly diligent and vocal opposition group (No Solar Desert) linked to the WB4 site at Clayworth. They delved deep into subjects such as ALC and China's solar panel manufacturing ethics. These concerns were highlighted to the Henry Smith Charity, who own the land, with a number of their trustees being members of the Church of England.

The group was hugely successful in their efforts to get the WB4 site withdrawn from the scheme and were clearly a thorn in IGP side.

IGP conducted soil analysis on all sites of the West Burton and the Cottam Solar Projects as required for their DCO submissions.

During the Stage 2 public consultation, the analysis of that soil sampling was incomplete. The PEIR reports showed this preliminary grading.

Before the close of that Stage 2 consultation, the analysis of the soil samples was apparently finalised. This now showed that the whole of the West Burton 4 site classed as BMV, in stark contrast to the first published results and therefore would be withdrawn from the scheme. The final analysis results for the other WB and Cottam sites stayed exactly the same. How could this be?

Was this dramatic grading change being used as an off ramp by the Applicant to rid themselves of this troublesome and unrelenting opposition group?

The communities around WB4 were now free from their solar desert threat.

I doubt that the ALC sampling and analysis was impartial or accurate, with such fine lines between grades 3a and 3b and with both the Developer and the analyst working together with clear financial incentives.

IGP was approached to see if independent soil sampling was possible due to this loss of faith around the WB4 debacle, but delays in obtaining a response and unrealistic demands then placed upon us, it was decided that this was impractical with over 5,000 acres to cover.

I believe significant doubt has been cast over IGP professionalism and trust regarding ALC.

ALC could be a major determining factor for these schemes, so it is unfair that this one area is unable to be challenged.

The Applicant is clearly "marking their own homework."

I believe that unless ALC is independently verified it should not be given the weight it is currently afforded.

Please see the tables below showing preliminary and final ALC analysis on the West Burton Solar Project sites. With changes only to the WB4 site.

The Cottam Solar Project sites 1,2&3 had no changes between the preliminary and final analysis, as was the case for WB sites 1,2&3.

Only WB4 changed from 19.4% BMV to 100% BMV with the 80.6% 3b land disappearing overnight.

Table 18.10: Assessed Land Grading by Site Area (percentage)

Grade	1	2	3a	3b	4	5	Non-Agri	BMV	Total
Site									
WB1	0.0	0.0	20.2	79.8	0.0	0.0	0.0	20.2	100.0
WB2	0.0	0.7	3.4	95.9	0.0	0.0	0.0	4.1	100.0
WB3	4.6	1.7	38.9	54.3	0.0	0.0	0.5	45.2	100.0
WB4	3.7	6.1	9.6	80.6	0.0	0.0	0.0	19.4	100.0
WB Sub	0.0	0.0	0.0	100.0	0.0	0.0	0.0	0.0	100.0
TOTAL	2.4	2.3	18.8	76.3	0.0	0.0	0.2	23.6	100.0

Table 2.2: Assessed Land Grading by Site Area (percentage)

Grade	1	2	3a	3b	4	5	Non-Agri	BMV	Total
Site									
WB1	0.0	0.0	20.2	79.8	0.0	0.0	0.0	20.2	100.0
WB2	0.0	0.7	3.4	95.9	0.0	0.0	0.0	4.1	100.0
WB3	4.6	1.7	38.9	54.3	0.0	0.0	0.5	45.2	100.0
WB4	3.7	14.7	81.6	0.0	0.0	0.0	0.0	100	100.0
WB Sub	0.0	0.0	0.0	100.0	0.0	0.0	0.0	0.0	100.0
TOTAL	2.4	4.5	35.4	57.5	0.0	0.0	0.2	42.4	100.0