

7000 Acres

7000 Acres

7000 Acres Response to the Cottam Solar Project Ltd Application on the subject of:

Agriculture & ALC

Deadline 1 Submission – 17th October 2023

Agricultural Land Classification:

The group does not have confidence in the Agricultural Land Classification data published by Island Green Power for the Cottam Solar Project (CSP). 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 IGP results currently indicate that only 8.3% of land for CSP is BMV, 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. The data provided by IGP is inconsistent in the Wetness and Droughtiness Assessment where for Slowly Permeable Layer (SPL) depth to 35cm it identifies 31 entries as ALC grade 3a and 550 as ALC 3b, and for SPL 40cm 46 entries as ALC 3a and 511 as ALC 3b. All other factors such as Gley, Reddish and Wetness Class are within identified ranges. 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.

IGP have already identified that their soils consultants are inconsistent. IGP conducted soil analysis on all sites of the West Burton and the Cottam Solar Projects as required for their DCO submissions. At the time of their Stage 2 public consultation between June and July, the analysis of that soil sampling was incomplete. Their stage 2 PEIR reports stated this and the results they produced showed the grading for the consultation as preliminary. Prior to the close of that Stage 2 consultation, the analysis on the soil samples was apparently finalised because the “updated and final” results of the West Burton 4 site at Clayworth the data was 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). Results from all other

areas of the Cottam and West Burton Solar Projects weren't retested and remained unchanged. However IGP have stated that none of the topsoils or subsoils reacted to the in-field HCl test but the neutralizing value in the lab tests that IGP carried out for WB4 would suggest, in their own analysis, that they are calcareous soils. IGP's contention for the Cottam sites and the other West Burton sites is that it is not considered that the neutralizing value represent a naturally calcareous soil as Mag Lime has been spread. Why is this a different analogy to the West Burton 4 results?

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 it would be extremely informative if IGP's consultants were to carry out a new analysis based upon current data and using their professional judgement comparing that to the official results before deciding the land classification.

National Planning Policy Statement (NPPF) July 2021. 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. IGP have failed to take into account this guidance in preparing and submitting this project proposal.

Detailed analysis of the EN010133-000195-C6.3.19.1 ES Appendix 19.1 Agricultural Land Quality Soil Resources and Farming Circumstances Report prepared by Daniel Baird Soil Consultancy Ltd (Baird Soil) January 2023 identifies site survey results prepared by two companies for the Cottam Solar Project, namely a report by James Fulton MRICS FAVV of AMET Property dated 12th July 2022 for surveys of Cottam 1, 2 and 3 carried out in September, October and November 2021 and one by F.W Heaven BSc, MISoilSci of Land Research Associates Ltd dated 19th September 2021 for surveys of Land near Blyton

(Cottam 3b) carried out in September 2021. Within the AMET report a number of anomalies and inconsistencies are evident. Namely on page 1 of Appendix 3a records 8, 9, 21 and 35 the data for Subsoil 3 Mottles and Structure have been entered into the wrong columns. This makes one question whether this data has been actually analysed or just entered into this report as pictorial evidence because it is a requirement.

The second element of question is more important as survey result 1090 has been assessed as being Grad 3a, while 1121 has been assessed as being Grade 3b despite the survey results being exactly the same. This inconsistency in the analysis of the results needs to be explained.

Within the Land Research report there are 6 occurrences where the grade has been assessed as 3a/3b. An experienced assessor would have understood the importance of making a judgement decision erring on the better grade as a result.



It also questions the reported area shown in Table 1 Areas occupied by the different land grades when you add in all of the grade 2, 3a and 3a/3b observations and why did they omit grade 2 in their table.

Land Research Associates Ltd				
ALC Grade	Area (ha)*	%	Observations	%
3a	2.7	4	12	16%
3b	69.6	96	64	84%
Total	72.3	100	76	100%

We would question the professionalism of the parties involved in these reports. One element of Project Management has always been to check the data before publication. It is clear here that [REDACTED] have all failed to carry out their professional duties in this instance and therefore it puts into question all of the judgements that they have reported within these documents.