

7000 ISH2 Summary of Oral Submissions (ALC)

Cottam Solar Project

Deadline 3 – December 2023

Issue Specific Hearing 2 5 Dec 2023

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7000 acres submission on statements made on ALC

The initial question was raised by the Examiner as a result of the Applicants failure to respond to the 7000 acres question submitted in our WR's relative to the use of Climatic Data.

00:15:37:29 - 00:16:29:06

Daniel Baird Soil Consultancy working on behalf of the applicant responded. Yes for ALC we use climate data for the interactive factors of soil wetness and soil droughtiness. And these are the limitations which are typically most common on lowland arable land in England and Wales. The limitations tend to take place at different times of year. So the soil droughtiness limitation is an impact which comes in within the growing season, whereas the soil wetness limitation is an impact where it's a constraint on the farmers ability to get onto the land at an important time in the spring and the autumn for cultivation, sowing, harvest without incurring serious damage to wet and plastic land.

00:18:51:17 - 00:19:11:16

It is an objective climate data set. It will change relatively uniformly across the whole of England and Wales and it would have no bearing upon the index of grading of sites where it could be changed.

Tony Cort 7000 acres.

00:19:36:12 - 00:20:14:14

I'll admit I'm not an expert on ALC, but I have a lot of experience in project management and data management. One of my experiences is that the weather, the climate has changed significantly since 1988, when the data was established, and as a result of that the farmers in this area are noticing a considerable different amount of crop yield because of the changes in the weather and the associated effect on the land.

00:20:15:12 - 00:20:26:18

The question I asked you was, would it have any impact on your assessments if you took into account that change of climate?

00:21:55:12 - 00:22:29:08

I would say that if we were to change the data, what we would see is a widening of the gulf between the grades. So we'd be looking at the soil wetness limitation for 3B being harsher because we are getting more rainfall in the spring, autumn and winter. We'd be seeing the soil droughtiness limitation becoming harsher because we're seeing less rainfall and greater warmth in the growing season.

00:22:29:10 - 00:22:43:01

So we wouldn't see a change in grading. We would just be seeing a greater disparity between the limitations and challenges the farmer sees from that limitation.

The Examiner next asked about the anomalies within the ALC report.

00:23:11:26 - 00:23:28:12

REP-105 on pages two and four, it refers to a number of anomalies in the survey work.

00:24:48:09 - 00:25:42:21

An assessment is an interpretation of the grades. We don't simply polka dot the site with a single grade for each location. There is variation across the site, and so if you find an outlier within one grade, which you consider as a different grade, you make an interpretation based on whether you think that is a determinable area zone of soils within the site at that assessment scale, or if it is just a variation in a minor variation which in terms of the limitation for that land would be smoothed out into a single grade.

00:25:42:23 - 00:26:29:15

So there will be areas where an area of land was, for instance, grade 3A, where you may find an erratic point, which was grade 3B, for instance, if it had a very high stone content in the top soil. But you may not record that as an island or a complete hectare of grade 3B based on that single point. Similarly, if you found an erratic point of grade 3A within an area of land, you would not necessarily isolate those points in a wider area of grade 3B, it will depend on the surveyor's own assessment of what is happening with the soil and what sort of frequency of variation you're encountering.

00:27:19:08 - 00:27:26:04

So does that explain the anomalies which 7000 acres pointed out in their WR?

Yes.

00:27:26:25 - 00:27:53:16

Because I've been looking at the soil data and seeing where there are some points in the soil data which have been marked as one limitation to grade, but haven't been mapped as such, because we don't simply look at each of the data points and polka dot a map. With those gradings, we make an assessment of what the actual limitations on land use are from those gradings.

00:27:57:22 - 00:28:00:28

And to 7000 acres. Do you wish to come back on that at all.

00:28:03:20 - 00:28:06:15

Yes, sir. Tony Cort of 7000 acres.

00:28:07:26 - 00:28:23:13

I understand totally what you're saying. My concern is that ALC is a significant weighting in the eyes of everybody that's assessing this project.

00:28:25:02 - 00:28:56:21

What you have attempted to do is to explain that if you were to cherry pick certain pieces of Information then you could categorize all of the area on that basis. Now my argument is as data management, if you've got an error or an inconsistency in that data, you have to err on the side of reasonableness. Now, in our eyes, you should err on the side of 3A.

00:28:58:01 - 00:29:29:11

In your eyes you are looking to make it all 3B because that way it justifies your site selection. So we have a difference of opinion. And all I'm suggesting is that to resolve this, there needs to be an independent person who is an expert in ALC, who is not associated with any of the solar developments, to make a judgment of whether your assessment is correct.

00:29:30:04 - 00:29:31:14

And that's what we've asked for.

To resolve this difference of opinion I request that the Examiner asks Natural England for the opinion of their soils specialist on the surveyor's data and the subsequent reports by the surveyor and IGP's consultant.

In recent months we have received a number of comments from local farmers and land agents that they are pleasantly surprised how good the quantity and quality were of the crops harvested, considering the supposedly assessed quality of the soil, namely 3A or 3B. This assertion corroborates 7000acres view that land graded at 3B is valuable to the Nation in terms of Food Security.