7000 Acres Response to the Tillbridge Solar Application on the subject of:

Agricultural Land Classification (ALC) Errors and Inconsistencies

Deadline 2 Submission – 14<sup>th</sup> November 2024

## ALC:- Observation errors and inconsistencies

As a result of detailed analysis of the reported in EN010142-000298-6.2 Appendix 15-2 Agricultural Land Classification Baseline Report, we would question the professionalism of the parties involved in this report. One element of Project Management has always been to check the data before publication. It is clear here that Soil Environment Services Ltd, AECOM and the Tillbridge project team 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.

Apart from the erroneous data contained within a separate 7000 Acres WR on Pits and Boreholes there are a very serious number of errors and inconsistencies within the ALC data table as submitted.

The report starts with the following statement 'This report presents a survey of a larger area which was considered for the Scheme during the application and assessment process. As such there are areas surveyed and presented in this report which are no longer within the Order limits. This does not impact on the conclusions of this report.' We totally disagree with the closing statement. The ALC report is a significant document that carries a considerable weighting in the overall assessment of the application. As such it should represent only the scope of the project that is under examination and therefore this report should be adjusted so that only data for the areas of the site, within the Order limits that are under examination, should be included in the evaluation and results.

We therefore request the Examiner to instruct the applicant to revisit the ALC data report and delete all observation points that are no longer within the Order Limits. The remaining data should then be re-evaluated against the accepted ALC evaluation requirements and the results re-presented for examination.

Investigation of the submitted report indicates that there were initially 1358 observations, and of these 20 are reported as Number Omitted, 29 are reported as Point Removed and 7 have no explanation and no data entered against them, thus there are 1302 remaining observation points. Against these Observation points the applicant has identified and reported over 68,000 items of data. However, our analysis has identified that there are a considerable number of errors and inconsistencies within the data as documented in the table at the end of this document. 303 of the Observation points (23%) have errors in the data submitted. We therefore request the Examiner to instruct the applicant to revisit the ALC data report and correct all of the data accordingly and the results re-presented for examination.

When the corrected ALC report is submitted we further suggest that the Examiner would benefit from Natural England evaluating and reporting on the contents and interpretation of the corrected data, and not just on the methodology applied as has been the case on previous NSIP evaluations.

Whilst we are not experts in the field of Agricultural Land Classification, we have carried out some analysis of the submitted ALC report.

Analysis of Table 1a has identified a different interpretation in the resultant Textural Class from the sampled results, using an independent internet AI site. For example Observation Point 1220 reports the Textural Class as being C (Clay as identified in the glossary) whilst the internet reports it as being:- What soil texture would result from Sand 38.45% Silt 23.15% Clay 38.39%? With your sand,

silt, and clay percentages, the soil texture falls into the "Clay Loam" category. This texture has a balanced mix, retaining water well and providing good nutrients to plants while still allowing for some drainage.

Similarly with Observation Point 702 which is also reported as being Textural Class C (Clay as identified in the glossary), whilst the internet reports it as:- What soil texture would result from Sand 42.92% Silt 18.61% Clay 38.47%? With those percentages, your soil would be classified as "Sandy Clay." This mix typically has a good amount of clay to retain nutrients and water, while the sand provides enough drainage. It's a solid choice for various plants that need a balance of water retention and aeration.

We also note that in section 5.2. Droughtiness The Available Water Capacity (water the plant can extract: water held by the soil matrix against gravity between field capacity and the permanent wilting point) which subsequently when considered with respect to the Moisture Deficit for wheat and potatoes results in a slight droughtiness limitation for the silt loam soils on the east of the site giving an ALC of Grade 3b in places.

However in section 6.1 it states The Available Water Capacity which subsequently when considered with respect to the Moisture Deficit for wheat and potatoes results in a slight droughtiness limitation for the silt loams soils on the east of the site giving an ALC Grade of 3a.

Which of these grades is correct?

Observation No.	Cell reference								
10	F44								
11	Y48	Z48							
12	Y52	Z52							
14	Y59	Z59							
19	D77	1							
28	Y115	Z115							
29	Y120	Z121							
31	F128								
32	Y132	Z132							
39	Z160								
40	Z164								
51	Y207	Z207							
53	L214	L215	Y215	Z215					
54	L218	L219	L220	Y220	Z220				
55	L223	L224	Y224	Z224					
56	L226	F228							
57	L230	L231	L232	Y232	Z232				
58	L234	L235							
59	L238								
60	L242								
68	D273								
79	Y319	Z319							
80	Y324	Z324							
82	F332								
83	Y336	Z336							
85	Y343	Z343							
100	D401								
107	F432								
108	Y436	Z436							
110	Y443	Z443							
121	Z488								
128	Y515	Z515							
129	Y520	Z520							
130	0521	Y523	Z523						
131	Y528	Z528							
133	Y535	Z535							
148	D593								
153	L615	L616							
154	L619	L620							
155	L623	L624							
156	L626	L627	F628						
157	L630	L631	L632						
158	L634	L635							
159	L638	Y639	Z639						
160	L642	L643							
166	W665								
168	D673								
171	W685								

Observation No.	Cell reference								
176	K706	L706							
178	R715	Y716	Z716						
179	R719	Y720	Z720						
181	Y727	Z727	2720						
182	L730	2,2,							
183	L734	L735							
184	L738	2,00							
200	L803	L804							
204	R819	2001							
205	R823	Y824	Z824						
208	Y835	Z835	202 1						
212	Y851	Z851							
224	L898	M898	L899	M899					
225	L902	M902	L903	M903					
226	L906	M906	L907	M907					
227	L911	M911	2307	557					
228	L914	M914	L915	M915					
230	Y923	Z923	LJIJ	101515					
232	Y931	Z931							
233	L934	M934							
234	L938	M938	L939	M939					
235	L942	M942	2333	101333					
236	Y947	Z947							
239	F960	N960							
240	F964	N964							
248	D993	1,1301							
250	L1002	L1003	L1004						
251	L1007	L1008							
252	L1010	L1011							
254	Y1019	Z1019							
255	D1021								
256	D1025	Y1027	Z1027						
257	L1030	1.2027							
258	L1034	L1035							
259	L1038	1			1				
260	Y1043	Z1043							
268	D1073	1							
273	N1093	1							
298	Y1155	Z1155							
300	Y1163	Z1163							
303	Y1175	Z1175			1				
304	Y1179	Z1179			1				
321	F1248	1			1				
322	F1252	1			1				
323	F1256	1		1	1				
324	F1260	1		1	1				
325	R1263	F1264		1					
328	Y1275	Z1275	F1276	1					

Observation No.	Cell reference								
329	F1280								I
341	F1328								
342	F1332								
343	F1336								
346	X1347								
348	D1353								
359	D1400	N1400							
368	D1433	111100							
378	N1473								
388	D1509	M1510	F1512	N1512					
389	M1514	F1516	N1516	111312					
394	N1533	11310	111310						
398	D1543								
406	J1582								
408	D1589	N1589	01589						
414	F1616	N1616	01303						
416	K1622	L1622							
422	J1646	LIUZZ							
428	D1669								
430	F1680	N1680							
432	F1688	111000							
433	F1692								
439	N1713								
444	F1736	N1736							
448	D1749	F1752							
456	F1784	N1784							
468	D1829	111704							
469	N1833								
475	J1858								
488	D1909	Z1912							
489	Z1916	21312							
495	N1937								
500	N1957								
508	D1989								
522	Z2048								
523	Z2052								
524	Z2056								
528	D2069								
547	Z2148								
548	D2149								
551	M2162	Q2162	F2164	N2164					
552	M2166	Q2166	F2168	N2168					
558	D2189	Z2192		112100					
559	Z2196								
560	F2200	N2200							
561	J2202	112200					<u> </u>		
568	D2229								
588	D2309								

Observation No.	Cell reference								
589	J2314								
600	Z2360								
608	D2389								
612	J2406								
628	D2469								
631	J2482								
642	J2526								
646	Z2544								
647	Q2546	M2547	F2548	N2548					
648	D2549	10123 17	12310	112310					
653	F2572	N2572	Z2572						
654	F2576	N2576	Z2576						
655	Z2580	112370	22370						
656	Z2584								
657	Z2588								
658	Z2592								
660	J2598								
668	D2629								
688	D2709								
702	D2765								
703	F2772	N2772							
708	D2789	F2792	N2792	Z2792					
712	J2806	12/32	142732	22732					
713	D2809								
728	D2869								
734	J2894								
738	J2910	Z2912							
748	D2949	22312							
760	J2998								
768	D3029								
773	F3052	N3052	Z3052						
774	F3056	N3056	Z3056						
775	Z3060	113030	23030						
777	Z3066								
778	Z3070								
780	J3076								
788	D3107								
808	D3183								
826	F3258	N3258	Z3258						
827	F3262	N3262	Z3262						
828	D3263	Z3266							
841	AB3310								
842	J3314								
848	D3337								
860	J3382								
874	Z3440								
875	Z3444								
876	K3446	L3446							

Observation No.	Cell reference								
877	Z3452								
878	Z3456								
881	F3468	Z3468							
882	Z3472	23408							
883	Z3472								
888	D3493								
902	F3552	Z3552							
903	Z3556	23332							
904	Z3560								
908	D3569								
924	F3636	Z3636							
925	Z3640	23030							
926	Z3644								
	-								
928	D3649								
938	D3689	Nacoc							
939	F3696	N3696							
940	F3700	N3700							
941	F3704	Z3704							
942	Z3708								
943	Z3712								
948	D3729								
968	D3809								
988	D3889								
1002	F3948	Z3948							
1003	Z3952								
1004	Z3956								
1008	D3969								
1020	F4020	N4020							
1021	F4024	Z4024							
1022	Z4028								
1023	Z4032								
1028	D4049								
1043	F4112	Z4112							
1044	Z4116								
1045	Z4120								
1048	D4129								
1055	F4160	Z4160							
1056	F4164	Z4164							
1057	Z4168								
1058	Z4172								
1068	D4209								
1069	F4216	Z4216							
1076	F4244								
1077	D4245								
1087	F4288	Z4288							
1088	D4289	F4292	Z4292						
1090	F4300								
1091	F4304								

Observation No.		Cell reference										
1093	Y4312	Z4312										
1094	Y4316	Z4316										
1104	Z4356											
1108	D4369											
1112	M4386	Q4386	F4388	N4388								
1128	D4449	,										
1148	D4529											
1154	D4553											
1161	D4581	E4581										
1162	D4583	E4583										
1163	D4585	E4585										
1164	D4587	E4587										
1165	D4589	E4589										
1166	D4591	E4591										
1167	D4593	E4593										
1168	D4595	E4595										
1169	D4597	E4597										
1170	D4599	E4599										
1188	D4667											
1208	D4747											
1228	D4827											
1234	D4851											
1248	D4907											
1272	K4982	L4982	K4983									
1275	K4994	L4994										
1276	K4997	L4997										
1277	K5001	L5001										
1278	K5005	L5005										
1280	K5014	L5014										
1288	D5043											
1293	Z5064											
1298	K5082	L5082										
1308	D5121											
1311	J5135											
1312	U5137	V5137	R5139	F5140	N5140	Y5140	Z5140					
1313	S5141	K5142	L5143	R5143	F5144	N5144	Y5144	Z5144				
1314	K5146	L5146	05147	R5147								
1315	U5149	V5149	R5151	F5152	N5152	05152	P5152	Y5152	Z5152			
1317	U5158	V5158	F5160	N5160	Y5160	Z5160						
1318	U5161	V5161	R5162	F5163	N5163	W5163	X5163	F5164	N5164			
	Y5164	Z5164										
1319	S5165	T5165	K5166	L5166	F5167	N5167	W5167	X5167	F5168			
	N5168	Y5168	Z5168									
1320	J5171	R5172										
1321	U5173	V5173	R5174	K5175	L5175	R5175	F5176	N5176	Y5176			
	Z5176											
1322	U5177	V5177	R5179	F5180	N5180	Y5180	Z5180					
1323	U5181	V5181	F5183	N5183	P5183	W5183	X5183	F5184	N5184			

Observation No.	Cell reference										
	P5184	Q5184	R5184	Y5184	Z5184						
1324	S5185	T5185	K5186	L5186	F5187	N5187	P5187	W5187	X5187		
	F5188	N5188	P5188	Q5188	R5188	Y5188	Z5188				
1325	R5192										
1326	R5195	F5196	N5196	Y5196	Z5196						
1327	S5197	R5198	R5199	F5200	N5200	P5200	Y5200	Z5200			
1328	D5201	S5201	R5202	R5203	F5204	N5204	P5204	Y5204	Z5204		
1329	K5207	R5208									
1329A	K5210	L5210	R5210	K5211	L5211	K5212	L5212	N5212	R5212		
1330	K5214	L5214	F5216	N5216	Y5216	Z5216					
1331	S5217	T5217	R5218	K5219	L5219	R5220					
1332	K5223	L5223	F5224	N5224	Y5224	Z5224					
1333	R5227	F5228	N5228	Y5228	Z5228						
1334	F5232	N5232	P5232	Y5232	Z5232						
1335	R5235	F5236	N5236	Y5236	Z5236						
1336	S5237	T5237	F5239	H5239	N5239	W5239	X5239	F5240	N5240		
	Y5240	Z5240									
1337	15242	J5242	K5242	L5242	P5242	Q5242	R5242	Y5242	Z5242		
	F5243	N5243	W5243	X5243	Y5243						
1347	D5281										
1348	D5285										
1355	F5316										