From: Kirk Hill **[Redacted S.40]**
Sent: 05 May 2021 10:32
To: Williams, Arwel (ESNR - ERA - Land, Nature & Forestry) **[Redacted S.40]**
Subject: FW: Blackberrry Lane Solar Park

Regards

Kirk Hill
[Redacted S.40]
Please visit our website: www.adas.uk

From: Ruth Metcalfe **[Redacted S.40]**
Sent: 03 May 2021 17:24
To: Martin Worsley **[Redacted S.40]**
Cc: Kirk Hill **[Redacted S.40]**
Subject: Blackberrry Lane Solar Park

Martin- please find attached a review/comments of the technical appendices. The two main points are that 1) the assumption point 3 pg 8 in the ALC guidelines is used to show that a solar park development can be considered reversible in terms of ALC grading so there is no loss of BMV and 2) there is no detailed decommissioning/restoration plan (will be prepared in year 39), so how can the applicant demonstrate that the same amount of BMV present now will be present after decommissioning. Please feel free to add/delete to my review.

I hope to join the call if possible from Jones Hill Wood. The start of the call at 10am should coincide with the excavator/dumper truck drivers break. If I don't manage to join the call please take whatever (if anything) you think is relevant from my review to the phone call. Thanks

Ruth

Ruth Metcalfe

[Redacted S.40]

DNS-3245065-000040-Blackberry Lane Solar Park **Ruth Metcalfe**

Environmental Statement Volume 2 Appendices **03/05/2021**

1. An Agricultural Land Classification of the proposed site (37ha) for a solar park at Blackberry Lane, Cosheston, Pembrokeshire has been undertaken (**Appendix A5.1**). Guidance for the assessing the quality of agricultural land as set out in the Ministry of Agriculture, Fisheries and Food (MAFF) revised guidelines and criteria for grading the quality of agricultural land (1988) has been followed.
2. The survey report that 30.5 ha was classified as Grade 2 and Subgrade 3a with a further 6.5 ha as Subgrade 3b.
3. The Soil Survey of England and Wales soil association mapping shows the East Keswick 3 soil association across most of the site with the Brickfields 2 soil association mapped in the northern part of the site.
4. The East Keswick 3 soil association is described as a well drained deep soil, typically of medium clay loam texture to 100cm. The Brickfield 2 soil association is described as a slowly permeable seasonally wet soil with a topsoil of medium clay loam overlying a subsoil of clay.
5. The survey report has been validated and accepted by Welsh Government.

6. **Appendix A5.2 Agricultural Assessment Report (document reference BL013)** considers '*the impact of the proposed development on the agricultural land which it will occupy on the existing agricultural businesses*. General statements are given.
7. Para 24 states that 'soil and land quality will be largely unaffected.' How can this be demonstrated by Wessex Solar Energy?
8. **Appendix A5.3 Land Quality Implications Assessment (document reference BL014)** considers *'whether the proposed Blackberry Land Solar Park will result in the unacceptable loss of Best and Most Versatile (BMV) agricultural land in planning terms.'* The current methods of assessing land quality, changes which may occur to the quality of the agricultural land as a result of the solar park construction, operations and de-commissioning are addressed. A do-nothing scenario is presented which considered how future land quality may change.
9. At Para 10 (Appendix 5.3) Wessex Solar Energy states that physical factors such as climatic and site factors will not be considered, and their report will focus on soil characteristics only as 'these play an important role in determining agricultural land quality'. The characteristics considered are texture, structure, depth and stoniness. These characteristics are considered with the MAFF Agricultural Land Classification guidelines as limitations which may act separately or in combination or through interactions with climate or site factors. There is also reference to the 'chemical properties of soils in relation to the long-term potential of land'.
10. In Para 31 Wessex Solar Energy considers the loss of BMV land. Direct loss is considered to mean 'land no longer available for agricultural use' and indirect loss as 'activity which reduces the quality of land such that it would no longer be considered to be BMV land'.

11. Planning Policy Wales (Edition 11) para 3.58 states that Agricultural land of grades 1,2 and 3a of the Agricultural Land Classification system is the best and most versatile and should be conserved as finite resource for the future'. Reference is made to TAN 6 Annex B Paragraph 2 (need clarification from WG on whether this is applicable).
12. Para 33 refers to 'no policy, guidance or legislation which limits the type of agricultural use of BMV agricultural land'. There is also reference to the mentioned MAFF economic classification in the 1960s that was never developed due to many issues. Land managers make decisions on how they use their land taking into account the objectives of their business and do not need 'permissions or consents' for agricultural use. Wessex Solar Energy states that there is 'no mechanism in place to prevent or monitor the indirect loss of BMV via unsustainable or inappropriate agricultural activity'. Land managers who receive Welsh Government agricultural payments or other environmental schemes subject to following good agricultural practices. (PPW 10 (edition 11) refers to Planning applications for Developments of National Significance (DNS). This may give a definition of 'development' (others to comment)
13. Wessex Solar Energy states that the temporary use of land does not necessarily constitute loss.
14. Para 37 quotes one of the assumptions given in the MAFF Revised Agricultural Land Classification Guidance (page 8). The assumption was included so that where it was known that a <u>major improvement scheme</u> such as new arterial drainage scheme was proposed by a then Internal Drainage Board was planned and would alleviate flooding of agricultural land then the impact of the scheme would be considered when classifying the land. In the case of limitations which are uncertain but potentially long-term the situation commonly arises on opencast coal sites or land subject to mineral extraction and then used as a landfill site before restoration to agricultural land use. For many situations there is an aftercare period and in the case of gas-induced anaerobism and subsoil compaction the limitations are not easily remedied. As part of the aftercare programme the land would be classified, and the grade would take into account the limitations present at the time of the survey. This is stated on page 8 of the MAFF ALC Guidelines 'Physical conditions on restored land may take several years to stabilise; therefore, the land is not normally graded until the end of statutory aftercare period, or otherwise not until after 5 years after soil replacement'.
15. Wessex Solar Energy states that while not referring to the development of agricultural land it does refer to works in the 'near future'. <u>The assumption quoted in Para 37 is not intended to address the development of agricultural land.</u>
16. THIS POINT IS KEY. IF IT IS CARRIED FORWARD THEN CASE for loss fails.
17. The conclusion of Wessex Solar Energy is that 'if activity or use which may temporarily reduce the quality of BMV land is easily reversible then this should not be considered to result in the loss of BMV land.' Further explanation on this point presented should be given by Wessex Solar Energy (i.e., what do they consider would reduce the quality of BMV land and how is it considered easily reversible.)

18. Wessex Solar Energy develops its case further in Section 5 Potential Impacts based on their interpretation of the assumption in the MAFF Revised ALC Guidelines (point 3 page 8 of the ALC Guidelines).

19. Wessex Solar Energy pursues the Indirect Impacts of the Development (Section 5.2).

20. The potential indirect impacts on four soil characteristics within the ALC Guidance. In the ALC Guidance refer to soil limitations which can act as limitations separately or in combination or through interactions with climate or site factors. The Agricultural Land Classification survey (Appendix A5.1) shows that the land is classified as Grades 2 and 3a and the main limitation is soil wetness, which considers the soil structure, porosity, texture and meteorological parameter of Field Capacity Days (when the soil moisture deficit is zero). Identifying the soil characteristics is misleading and does not support the case that the quality of the land will not be affected.

21. These include soil texture and structure; soil depth; stoniness and 'soil chemistry'.

22. 'Soil chemistry' is interpreted by Wessex Solar Energy as 'impacts on soil chemistry may result from any activity which causes change to the chemical composition of the soil including nutrient presence and availability'. The ALC Guidelines refer to 'Chemical Limitations' and the chemical status of a soil does not affect grading where nutrient levels 'can be maintained or corrected by normal applications of fertiliser or lime'.

23. Wessex Solar Energy recognises that the impact the construction and decommissioning activities of the quality of agricultural land should be considered.

24. Figures are presented for the development footprint (are these accepted? How many supports for panel frames will be required- number of posts going into ground?)

25. Soil would be excavated to allow installation of the components. Has the volume (m^3) been given? The excavated soil would be spread 'across the ground surface in the immediate vicinity of the item being installed'. (is this storage or is it waste?). Will the soil be lifted after 40 years at the decommissioning stage? The vegetation cover of the receptor topsoil would have to be removed. Records of the location, depth and texture of soil resource should be made.

26. Section 5.3.2.3 Decommissioning Activities are outlined.

27. A do-nothing scenario is presented. The details given are not BMV land specific.

28. Wessex Solar Energy refer to the 'importance of organic matter content' in the ALC guidance. Organic matter content per se is not a limitation in the ALC Revised Guidelines.

29. 6.4 Solar Parks- Operation and Restoration. Wessex Solar Energy refers to the grazing use of the site during the Solar park operation. There is reference to 'the *establishment of permanent grassland, if correctly managed could increase the soil and land quality over time'.* There is no explanation of the term 'correctly managed'. (Para 100).

30. Restoration (6.4.2)-no specific detail on soil re-instatement.

31. The land will be disturbed by the various components of the solar park. The spatial distribution of the land disturbed is unknown. There is no detail on mitigation of the risk of soils mixing or loss of topsoil spread for storage.

32. There is no statutory requirement for agricultural land to be assessed and reported onto the appropriate authority following decommissioning (comment from Welsh Government?).
33. The quality of any agricultural land can be detrimentally affected if land has been disturbed and there is little or no topsoil this may be an additional limitation which needs to be taken into account when grading the land. A soil limitation can occur on sites restored to agriculture where different soils, or topsoil and subsoil have been mixed. The limitation will be assessed and graded accordingly. A pattern limitation could affect the grading of the land.

34. **<u>Appendix A6.1 Outline Decommissioning and Restoration Plan (Document BL013)</u>**

Wessex Solar Energy proposes developing a more detailed decommissioning plan at the appropriate time (Why not now need to demonstrate how BMV will not be lost?). If as they state, the solar park can easily be decommissioned why no plan.

35. The statement that the 'soil surface would be restored to its original conditions 'gives no details. A crane is required to dismantle equipment- demolition/engineering job. Excavations will be backfilled with soil sourced on site- is there sufficient volume of soil. What are appropriate soil management techniques?

36. For the construction compound it would be expected that the topsoil and subsoil be stripped and stored on site for replacement following the completion of construction works. Need a methodology for soil stripping, storage and replacement for all works including intrusive development.

37. That there will be the same quantity of BMV agricultural present before the installation of a solar park and upon decommissioning is not supported by detailed a decommissioning and restoration plan.