

Submission on the Updated oSMP for Deadline 2

Interested Party Ref: [REDACTED]

I would like to comment on the updated P02 document outline soil management plan.

The only amendment made to the original oSMP is a guarantee to carry out further soil testing, post DCO, to bring the frequency of testing into line with the national guidance of one sample per hectare. None of the other amendments suggested have been made. I would therefore like to bring the following comments to the notice of the examining authority.

Section 2.2.3 The applicant has not removed non-agricultural land from the BMV assessment. This land is not available for farming so should be removed from the assessment. See Table 2.1 Non-agricultural land represents 4.65% of the total area.

Section 2.2.5 They continue to compare the site with the land classification in the surrounding area using old provisional ALC data which they state is not sufficiently accurate for development applications. How relevant is this comment? Some parts of Bedfordshire are 30 plus miles away from the site.

Section 4.1.7 There should be a more technical guidance as to the suitability of soils for construction during wet periods of the year. The 3mm roll test is a very antiquated method for determining soil wetness and unsatisfactory to assess a large area. There are too many variables involving this method.

Section 4.1.10 No completed method statement for mitigating soil damage during wet periods.

Section 4.1.12 GPS should be fitted to all excavation machinery not at the applicant's discretion

Section 4.1.22 Long term storage guidelines will definitely be required as materials will need to be stored for use during decommissioning.

Section 4.1.29 Cultivating to improve soil drainage post construction will be almost impossible. It is inconclusive that grass will improve soil structure and organic carbon. The consensus to date is that both are lower underneath panels ( Environ. Res Lett .20 (2025) 024003 )

Section 5.1.5 Trench settlement may take a number of years. Does the applicant have the necessary agreements in place to give access for later reinstatement?

Section 5.2.4 Soils will become compacted during replacement even in dry weather. Soil reinstatement will be limited due to the location of the panels. No policy in place.

Section 5.2.6 Little or no evidence that soils will improve under panels ( See Section 4.1.29 ) Erroneous claim.

Section 7.3.1. It will be almost impossible to locate field drains from a field drainage plan as most drains are only six to eight inches wide. It will be a futile exercise. How will the applicant know when they have damaged a drain during piling? Drains found during trenching should be repaired immediately not capped as suggested. All drains are perforated and covered in stone so water would continue to flow. There is no doubt that all damage to drains will not be repaired and full reinstatement will not be possible.

In summary the applicant's oSMP Plan 02 does not show that the quality of agricultural soils can be protected and restored during the lifetime of this project. The updated version , apart from one paragraph, is a repetition of P01. It still does not provide any enforceable targets for soil restoration to the original ALC grades. Likewise there are no wet weather working thresholds to prevent compaction and little information on the length of time soil storage will be required. In most cases the final SMP is deferred to a later date leaving a lot of uncertainty about what will ultimately be presented. This lack of information does not provide sufficient confidence that land will be safeguarded to the highest possible standard.