

Lucy Frazer QC MP
Matt Hancock MP
House of Commons
London
SW1A 0AA

28 July 2022

Dear Ms Frazer and Mr Hancock,

Thank you for your letter, dated 19 July 2022, regarding the assessment of soil within the Environmental Statement (ES) that has been submitted as part of our Development Consent Order (DCO) application.


Within this letter there are a number of references to Appendix 12B of the ES: Soils and Agriculture Baseline Report [APP-115]. For ease of reference, I have enclosed a copy of this document. It is also available to view on the Sunnica Energy Farm page of the Planning Inspectorate's National Infrastructure Planning website: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010106/EN010106-001863-SEF_ES_6.2_Appendix_12B_Soils%20and%20Agriculture%20Baseline%20Report.pdf

While we appreciate that a number of your constituents have contacted you in relation to the assessment that has been carried out, we have been consistent in our view that the appropriate forum for this to be discussed is the Examination. In this regard, we note the Examining Authority's inclusion of soil quality in its initial assessment of principal issues to be considered during the Examination (Annex C of the Rule 6 Letter – 28 June 2022 [PD-009]). This should give your constituents confidence that the matter will be given appropriate consideration and will be assessed robustly through the Examination process.

We are confident in the assessment of soil quality/agricultural land classification that we have carried out as detailed in Appendix 12B of the ES [APP-115]. Our assessment has been carried out by Daniel Baird, who is a member of the British Society of Soil Science. He has considerable professional experience in Agricultural Land Classification (ALC) dating back thirty years to being part of the Ministry of Agriculture, Fisheries and Food (MAFF) ALC survey team. ALC survey work for the site complies with the guidance given by the MAFF ALC Guidelines (October 1988) and subsequently. Additional support on the appropriate application of the ALC system in England is given in Natural England publication TIN049 - Agricultural Land Classification: protecting the best and most versatile agricultural land. <http://publications.naturalengland.org.uk/publication/35012> His assessment makes use of data from three separate sources, all of which agree with our assessment of the soil quality.

Within your letter, you state: *"We have been informed that the soil assessment discounts the contribution of widespread irrigation to land quality, despite its ability to significantly enhance the soil."* To be clear and transparent, we have discounted irrigation in our assessment as this is the appropriate methodology for assessing agricultural land classification (ALC). Annex C of Appendix 12B of the ES [APP-115] includes correspondence with Natural England relating to ALC methodology

0808 168 7925



that confirms this to be the case. While we acknowledge that irrigation will be considered as a factor through the Examination process, it does not enhance the soil. Rather, it provides water to a crop that is in deficit because the soil cannot retain sufficient water to satisfy the crop's requirements.

With regard to the location of the soil pits, we have provided details of sampling locations in Annex F of Appendix 12B of the ES [APP-115]. We do not agree with the assessment that these locations 'have only been dug on field boundaries and on poorer land'. Our inspection pit locations are all set away from headlands, field margins and any other areas of concentrated farm traffic. GPS grid references given for each inspection pit confirm this to be the case. The assessment used inspection pits to confirm the presence of poorer quality land. These pits corroborate the findings of the auger borings placed at 100m intervals within the fields that we assessed. These sample points were placed according to a systematic randomised survey which was designed to remove any subjective selection of sample locations.

We are aware of the previous survey of ALC carried out by the then Ministry of Agriculture, Fisheries and Food in 1992. We have included a copy of the results of this in Annex B of Appendix 12B of the ES [APP-115]. This assessment dates back to 1992. Subsequent to that survey, updated guidance in 1997 removed irrigation as a determinant of ALC grade and instead listed it as an additional agricultural consideration. As noted above, the correspondence with Natural England included within Annex C of Appendix 12B of the ES [APP-115] confirms that the correct approach is to review the historic assessment without irrigation. As such, it is our view that this assessment accords with our own.

In your letter you refer to an Anglian Water survey. We assume this is a reference to the soil assessment carried out on behalf of Anglian Water for their planning application for the proposed Bexwell to Bury Pipeline [East Cambridgeshire District Council planning reference number: 21/01168/ESHYB]. This does not include any new survey work but makes use of provisional ALC maps alongside work undertaken by the former Ministry of Agriculture, Fisheries and Food. As the provisional ALC maps do not identify the subgrades 3a and 3b of ALC Grade 3, this assessment chooses to categorise all Grade 3 land as Grade 3a. The Provisional ALC plans use an outdated methodology and present data at a scale that is not suitable for a site-specific assessment of land quality. We are of the view that there is nothing in this assessment to challenge the detailed ALC field survey that we have undertaken for our DCO application.

We were not previously aware of the assessment carried out by Patrick Stephenson to which you refer in your letter. If you would be able to share a copy of the results with us, we would be happy to review them.

In summary, we consider the assessment of ALC detailed in our DCO application to be robust and accurate. It has been reviewed by Natural England who will continue to input and comment through the Examination. We do not therefore consider further assessment to be necessary and will be communicating this to landowners.

We can confirm that we have not asked landowners to deny access to their land for such surveys to be carried out by third parties. We have only advised that such surveys are not being undertaken on



our behalf nor with our oversight. As I am sure you are aware, any decision to grant access is at the discretion of the respective landowner and is not something that is within Sunnica Ltd's control.

If you have any further questions or comments, please do not hesitate to get in touch using the contact details at the end of this page.

Yours sincerely,



Luke Murray
Sunnica Ltd

| 0808 168 7925

