

# A G Wright & Sons (Farms) Ltd

12<sup>th</sup> January 2023

Dear Sirs

**Sunnica Application EN 010106**

**Deadline 5 Submission**

**Unique ref nos: SUNN - AFP 191**

This letter responds in brief to matters relating to Agriculture I have set out below some of the issues:

The assessment of Best and Most Versatile Land

1/ Sunnica state that of 981 hectares (has) surveyed 37.3has are BMV which amounts to 3.8% of the application site (AS). See [APP-115 - 6.2 Appendix 12B: Soils and Agriculture Baseline Report table 5-2 page 9]

2/ Sunnica's soil consultants Daniel Baird Soil Consultancy Ltd (DBSC) surveyed 924has of the site (for the remainder of the area he relied on surveys done previously by others) and found 8.8has of BMV less than 1%. See [APP-115-6.2 table 5-3 ALC Grade Distribution by Survey].

3/ Say No To Sunnica Action Group Ltd (SNTS) have employed three soil experts Patrick Stephenson Ltd, Landscape Ltd, and Reading Agricultural Consultants, who all are of the opinion that over 50% of the application site would be BMV. This amounts to in excess of 490 has of BMV. For example SNTS believe the majority of Sunnica East Site A is BMV. See [REP4-064] which includes a statement from the previous farming partner of Lee Farm Freckenham Estate (which is Sunnica East Site A)

4/ SNTS are confident there will be a high level of BMV in the AS for the following reasons:

a/ local knowledge – we see good quality high value crops being grown on the AS every year. This is confirmed by neighbouring farmers yields out performing national averages as set out in [REP2-097e] and confirmed by Feckenham Estate statement above.

b/ Irrigation – the landowner's who have land in the AS have invested heavily in irrigation facilities which is expensive. They would only do this if the land was capable of being highly productive. See [REP2-097q]

c/ ALC and Natural England predictive maps support the presence of at least 50% BMV on the AS. See [REP2-097u]

d/ SNTS have been denied access to the AS by the landowners on three occasions so have had to take soil samples and dig inspection pits on neighbouring land. The conclusion in table 2 of Patrick Stephenson's report [REP2-097f page 9] is that 78% of the land surveyed is BMV.

5/ Sunnica repeatedly state they are confident in the conclusions of the DBSC report. We therefore do not understand why the landowners / Sunnica will not allow the report's findings to be verified by in the first instance a sample soil survey of Sunnica site East A by a soil expert from SNTS and DBSC. If the report is robust what is the concern?

6/ I believe the only way DBSC could have found less than 1% BMV on the 924has of the AS they surveyed is for the following reasons:

a/ despite Mr Baird being a member of British Society of Soil Science (BSSS) his report has not been carried out in accordance with their Guidelines. See [REP4-045]



- b/ The report misses out data and irrigation information.
- c/ the soil classification plans do not tally with the auger boring soil sample information
- d/ the auger borings are often too shallow
- e/ Soil stoniness is consistently over stated
- f/ Sand content is over stated
- g/ inspection pits are dug on tracks
- h/ the benefits of irrigation are totally ignored
- i/ Productivity of the land is not considered

Technical Note – clarification Requested by Natural England on Agricultural Land Classification [Rep4-032 Appendix A]- Please read comments below in conjunction with the technical note:

We do not believe this paper helps us understand why DBSC found less than 1% BMV for the following reasons :

2.1.1 – the soil droughtiness has been overstated – the land has been downgrade by shallow auger borings, and the overstating of the sand and stone content. A formula used previously unsuccessfully by DBSC in the Ripon case [REP2 -240D P94-98 para 146 to 177]. In the Inspectors report DBSC's work is referred to as the Savills report. In Para 159 the Inspector refers to high stone content, auger borings to only 35cms, and a passing mention of trial pits, but without corresponding records. The inspector concludes in para 176 the Savills report had a number of shortcomings, none of which were resolved persuasively in the evidence presented. As such the Inspector found the case 'largely unconvincing'.

2.1.2 – amongst the 100's of archaeological trenches on the AS which are these two. There should be pictures of the inspection pits.

2.1.6 – why have we only just been told about the DBSC moisture balance calculation. For this formula to be valid it should have been detailed and explained in the original report. On what basis has this formula been put together. It would appear it has been cobbled together after the report was submitted as a reaction to the questioning of the report. Where else and by whom has this formula been used. What is the precedent to use such a formula. Where are the photographs of the soil inspection pits over shallow chalk.

2.1.7 – We are concerned about what else has been omitted from this report. These omissions make us feel even less able to rely on any part of this report.

What this technical note does not do is explain:

- 1/ why only six pits were dug
- 2/ why were the pits dug on roadsides or in known areas of poorer land
- 3/ why were maps and photos not provided of the pits
- 4/ why are 341 auger borings less than 40cm deep
- 5/ Why are areas recorded as 3a and 3b in the soil sample schedules then shown as grade 4 on the land classification plans prepared by DBSC.



Applicants Response to Written Representations [REP3A-035]

These will be replied to in more detail at deadline 6. However Sunnica have used two consistent statements throughout many of their replies to agricultural matters and I would like to comment as follows:

a/ The first statement is: 'The ALC assessment (to determine the grades of the soil and therefore the amount of BMVL within the Order Limits) presented for the Sunnica application is a combination of survey work by three organisations. In addition to the work commissioned for Sunnica. It includes the ALC survey of the consented minerals site and ALC survey work by MAFF. The results of the three separate surveying organisations are consistent'. This can be found on p.36 para2.

We do not consider this statement to be correct.

RAC's survey of the Bay Farm mineral extraction site – this soil was over sand and gravel deposits and would not be representative of the AS. Only 3.3 has of the land surveyed by RAC is within the AS. See [App-115-6.2 Annex A]

The ALC survey for the consented minerals southern site found 95% BMV even using DBSC's incorrect irrigation formula. See [App-115-6.2 - Annex B]

The ALC survey work for MAFF had eight inspection pits on 189 has and showed 90% BMV. Using DBSC's incorrect irrigation formula it would still be 37% BMV. See [App-115-6.2 -Annex B]

How can these reports be consistent with DBSC findings of less than 1% BMV on 924has. They are more consistent with SNTS position that at least 50% of the site is BMV.

B/ I quote [Rep2 -211, Rep 2-214 page 560] 'The ALC assessment by DBSC, Sunnica's soil consultants is an objective assessment by an experienced soil scientist who is a member of the British Society of Soil Science (BSSS). BSSS code of conduct requires that all members discharge their professional responsibilities with integrity and due scientific and technical competence'

We have set out many times why DBSC report does not comply with the BSSS standards.

Sunnica should not be repeating these statements in support of their BMV case as they are not correct.

Please consider the above comments and insist that we take further soil samples on the AS starting with Sunnica Site East A to ensure the correct grading of the land is used.

Many thanks

Yours faithfully



Nick Wright