

**East Cambridgeshire District Council  
(20031149)**

**Cambridgeshire County Council (20031358)**

**Suffolk County Council (20031377)**

**West Suffolk Council (20031311)**

Additional Submission

**Sunnica Energy Farm (EN010106)**

**Deadline 7**

**3 March 2023**

This additional submission is from the four host local authorities, Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council, West Suffolk Council.

We note that there remains a dispute between Sunnica and the SNTS Group about the quality of the soil and the Agricultural Land Classification assessment. It would appear that the soil science experts reporting to the SNTS Group have identified anomalies that seem to raise reasonable and significant doubts about the assessment undertaken by Sunnica's experts. The Councils do not have specific internal expertise on the matter but would wish to see it resolved by the ExA. As it would take considerable time and expense for the Examining Authority to commission, or instruct a third-party to commission, an independent survey to resolve these doubts, and taking account of the late stage of the examination, the Councils suggest a more expedient (but no less robust) approach.

That is for the ExA to apply the Rochdale envelope approach to this issue. This would mean that, where doubts are present in respect of the analysis undertaken by Sunnica, a 'reasonable worst case' approach would be applied to assessment of the evidence. In this way, the ExA can be confident that the impact of any eventual scheme will fall within the Rochdale envelope. It will also mean that the doubts, in so far as they're established, which extend to the proper application of guidance on the assessment of agricultural land, will not render insufficient the information included in the Environmental Statement.

Such a 'reasonable worst case' approach would extend to the assessment of best and most versatile agricultural land included within the scheme.