

Date: 21 March 2023  
Our ref: 426337  
Your ref: EN010106



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**BY EMAIL ONLY**

Dear Mr Kean

**NSIP Reference Name / Code: Sunnica Energy Farm, EN010106**  
**Natural England's comments in respect of Sunnica Energy Farm Project, promoted by Sunnica Ltd**

**Examining authority's submission deadline 10, 24 March 2023**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The following constitutes Natural England's formal statutory response for Examination Deadline 10.

**1. Comments on the updated Construction Environmental Management Plan (CEMP) [REP8-010]**

- 1.1. Natural England welcomes the updated text in Table 3-7, including the provision of a soil specialist to ensure the construction work complies with the SMP; including identifying when soils are dry enough to be handled.
- 1.2. Natural England welcomes the clarification regarding the tailoring of seed mix to the soil properties through soil testing.
- 1.3. Mitigation measures to ensure bare ground is minimised are now provided, including the timing of seeding and the avoidance of trafficking until a green cover is established.
- 1.4. Natural England welcome that the text has been expanded to specify that the topsoil stripping depths are to be informed through the soil survey results
- 1.5. The updated soil storage method for the topsoil excavated from the access track, cable trenches and fence posts is now appropriate.

**2. Comments on the updated Framework Decommissioning Environmental Management Plan (DEMP) [REP8-012]**

- 2.1. Natural England welcomes the updated text in Table 3-7, including the provision of a soil specialist to ensure the decommissioning work complies with the soil management plan (SMP). The soil specialist should be on site during all soil handling activities, to advise on, and supervise, soil handling, including identifying when soils are dry enough to be handled and how to make the best use of the different soils on site.
- 2.2. The updated text sets out that the mitigation measures will be set out in the SMP to ensure there is no degradation of ALC grade, and that the reinstated land will be returned to the baseline ALC grade.
- 2.3. For the monitoring requirements, it should be noted that the light textured soils identified on site have insufficient clay content to reach a plastic consistence when wet. They can however be vulnerable to compaction when wet, impairing plant root growth and permeability. It is expected that the key principals and soil handling detail provided in Table 3-7 of the CEMP will be presented in the SMP, and will therefore be valid for both the construction and decommissioning phases.

This concludes Natural England's advice at this time, which we hope you will find helpful.

Yours sincerely

Joanna Parfitt  
Norfolk and Suffolk Area Team