

Dear Mr Kean

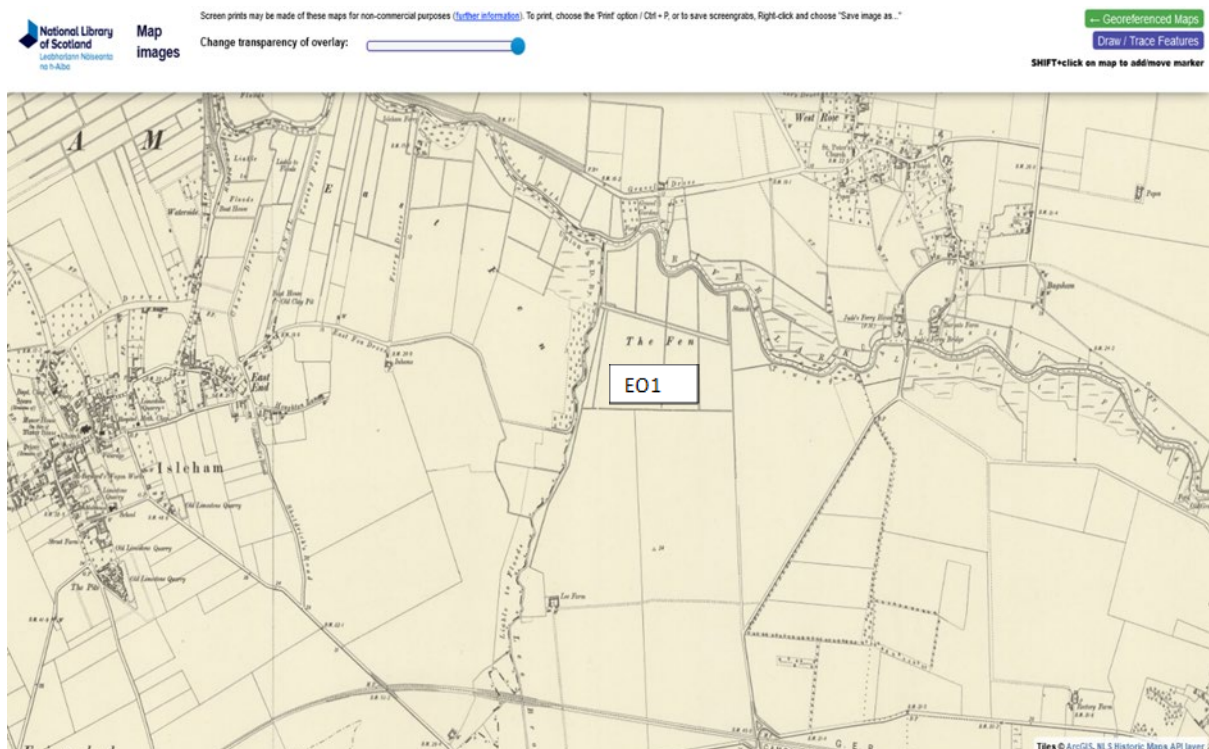
I write in response to Natural England's Deadline 8 submission published on 15<sup>th</sup> March

This included notes on a number of Moisture Balance calculations requested but not received previously.

1.5 There are standard calculations for moisture balances given in the guidelines. Even allowing for DBSC's unexplained allowances the figures checked by Natural England should have been the same as those given by DBSC, but that is not the case. Equations always give the same answer if the same information is input multiple times. That discrepancies are "small" and "do not affect the ALC grade" is irrelevant and should have caused NE to check both those figures and more across the site.

The first point checked was LF4 which is a point on Sunnica East A. DBSC augered to only 50cm and then stopped for hard stone. However (APP-075, PDA 002) record the archaeological surveys where Oxford Archaeological dug numerous trenches both in the vicinity of this point and across the field.

These trenches found that the area where LF4 is situated is on the Fen Edge, with many trenches showing peat. This is also shown on maps where EO1 and EO2 are labelled as "The Fen", these fields would generally have good moisture holding capability.

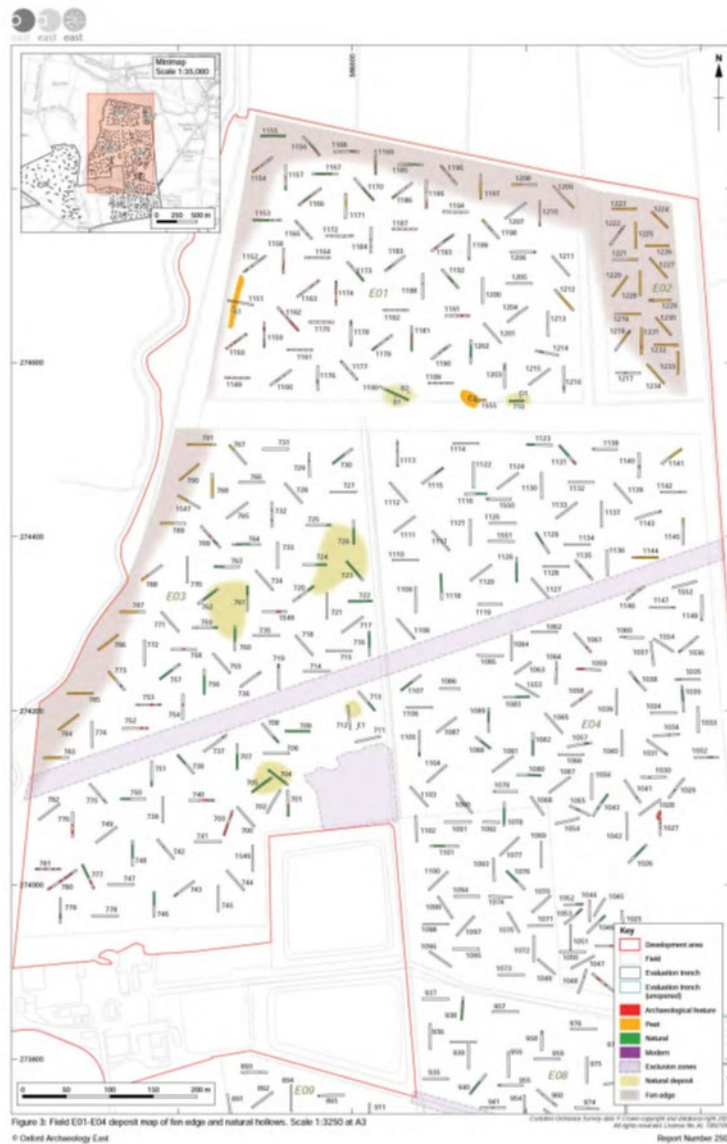


DBSC found 1 auger boring had peat despite the northern and western edges of the block being found to show evidence of the Fen Edge in the trenches.

Field EO2 No results are presented, this field is entirely a Fen Edge Field.

Points are missing over the field (APP 115 p147) which often seem to co-incide with areas where peat deposits were found eg above the farm along the edge of Lee Brook where Fen Edge deposits were found PDA 002 p 274 No explanation has been given for these missing points- whether or not these areas were even investigated by DBSC.

PDA-002 p274 shows the Fen Edge as found by the archaeologists



### 3.4 Trenches in Field E01

#### Summary

3.4.1 Field E01 was located along the northern edge of Site A but was not subject to the geophysical survey. It was bordered to the north and east by extant ditches and the west by the Lee Brook. Of the 70 trenches opened within the field 30 trenches revealed natural hollows or fen edge deposits

That the DBSC survey found shallow soils and only peat at one point does not tally with the picture painted by the archaeologists who cannot simply dismissed by the applicant as biased

The photographs of Lee Farm in the Archaeology report demonstrate how selective and misleading the photographs included in the DBSC ALC report are- they appear to have been chosen with the deliberate aim of showing the soil is shallow.

The archaeology photographs show that there is often a layer of chalk but use of the correct augers would have shown that there were further subsoil layers which were capable of penetration by roots and which would have supplied water to the plant making DBSC moisture balance calculations totally flawed.

Photos pp338 – 346 PDA-002



Plate 1: Field E26 Trench 1443 showing the flooded and icy conditions



Plate 2: Field E01 Trench 1197 showing the fen edge peat deposits, looking north





Plate 3: Field E01 Trench 1192, an example of one of the marling ditches (ditch 5726), looking south



Plate 4: Field E01 Trench 1154 Pit 5814, looking south-west

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Plate 5: Field E01 Trench 1202 Pit 5608, looking south-west



Plate 6: Field E01 Test Pit B1 showing the flint in the upper deposits, looking south

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Point ER14 has similar issues with low moisture balance due to insufficient auger depth

Elms Rd ER14 field E15 App 115 p 107 Augered to 30cm stop for stone.

App076 p 248



These discrepancies require further investigation which should have been requested by NE. There is a real risk of losing a large area of BMV land as a result of these incorrect surveys.

Anne Noble