



Rt Hon Lucy Frazer KC MP
HOUSE OF COMMONS
LONDON SW1A 0AA

The Rt Hon Grant Shapps
Energy Security and Net Zero
House of Commons
London
SW1A 0AA

26 July 2023

Dear Grant,

We are writing in reference to 'Sunnica Energy Farm' (Ref: EN010106) which is an NSIP application.

We understand the Planning Inspectorate issued its Recommendation Report to you on 28 June for your final decision by 28 September.

We appreciate that the Examination is now over, but we wanted to pass on the concerns many of our constituents have about the way the Examination process was conducted.

Please see attached a letter from Lucy's constituent, Nicholas Wright (of [REDACTED] [REDACTED]) on behalf of the Say No to Sunnica Action Group, which sets these concerns out in more detail. The Action Group has membership from across our constituencies.

Kind regards,



Lucy Frazer MP



Matt Hancock MP

Member of Parliament for South East Cambridgeshire

The Rt Hon Grant Shapps
Energy Security and Net Zero
House of Commons
London
SW1A 0AA

25TH July 2023

Dear Mr Shapps,

Sunnica – EN1010106

Application by Sunnica Ltd for an Order Granting Development Consent for the Sunnica Energy Farm Project.

The Sunnica NSIP Application site shown at (Plan 1) coloured red is within the constituencies of Matt Hancock MP and Lucy Frazer MP. Throughout the Sunnica NSIP process we have been concerned that the quality of the agricultural land has not been recognised. The Say No To Sunnica Action Group (SNTS) of which I am a member calculates that at least 50% of the Sunnica site is Best and Most Versatile (BMV) land.

We believe this error has occurred because Natural England (NE) have not considered evidence provided by SNTS or consulted with us or our experts during the course of the public examination. NE only met with the applicant and their advisors and did not attend the NSIP issue specific hearing on soil classification. I set out below the evidence:

Communication

Between November 2022 and March 2023 NE met with Sunnica and their representatives at least four times. SNTS employed Reading Agricultural Consultants (RAC) to represent them in soil classification matters. NE refused to meet with RAC, reply to their emails or speak to them on the telephone throughout the examination period.

Sunnica employed Daniel Baird Soil Consultants Ltd (DBSC) as their soil experts. Members of SNTS wrote 23 emails giving detailed evidence of the shortcomings of DBSC's work. NE did not address the contents of any of these emails which remain unanswered.

NE's Predictive BMV Plan (Plan's 2 and 3)

Plan 2: is NE's East Region Likelihood of Best and Most Versatile Agricultural Land map dated 18/08/2017

Plan 3: is the Sunnica Site overlayed on plan 2 edged black. This shows that 82% of the Sunnica site is 60% or more likely to be BMV.

NE have ignored their own plan without explanation and supported DBSC's report which states only 3.8% of the Sunnica site is BMV.

Other Mapping

Agricultural Land Classification mapping: (Plan 4). This plan shows the Sunnica site edged black and the areas of each grade of land coloured individually. We calculate that all of the grade 3 land at Sunnica East A is BMV and 50% of the remaining grade 3 land is BMV. This means that 53% of the site is BMV. NE rely on DBSC's findings that only 3.8% of the site is BMV despite the conclusions of their own work shown at Plan 2.

The Cambridge District map scale 1:63,630 is more detailed and identifies soil series. DBSC identify 3 soil series across the Sunnica site. This does not accord with the Cambridge District map which finds 9 different soil series. NE do not explain why this map is ignored.

Letter from Lucy Frazer MP and Matt Hancock MP

Copy attached at Letter 1. Comment as follows:

This letter was in response to a letter sent by Matt Hancock MP and Lucy Frazer MP dated 13th February. It arrived at 17.27pm on 28th March. The Examination closed at 11.59pm on 28th March. There was no chance to reply.

The reply from NE demonstrates the problem of not communicating with SNTS or its representatives:

- Provisional ALC maps are intended as a strategic guide – this point is accepted however it is highly unlikely that a provisional map that shows a 981 ha site with over 50% BMV will reduce to 3.8% BMV when a detailed survey is done. NE have not provided an explanation for this change. As NE have not engaged with SNTS or their experts we do not know for what reasons they have discounted the evidence provided.
- Irrigation – DBSC have ignored the economic benefit of irrigation. The whole of the Sunnica site is irrigated much of it from winter fill reservoirs.
- Natural England are satisfied with the approach and methodology employed by DBSC- DBSC's report fails the standards set out by The British Society of Soil Science (BSSS). NE have not explained why in light of this fact they have still accepted all the findings of the report.

Conclusion

SNTS asked on three occasions for access to the Sunnica site to carry out our own soil surveys but were refused.

A BSSS compliant soil classification report would have shown considerably more than 3.8% BMV on the Sunnica site which would have made the decision to grant consent for ground mounted solar complex. Sunnica/DBSC have been able to mislead NE because NE have not been rigorous in the scrutiny of DBSC's work. A decision on Sunnica is being made based on incorrect information.

The Solar Campaign alliance have seen other cases of land being downgraded to get consent for solar development and Sunnica being the largest scheme yet should not be allowed to continue this dangerous precedent.

Yours faithfully,

N R W Wright MRICS (on behalf of The Say No To Sunnica Action Group Ltd)

Date: 28th March 2023
Our Ref: MP2023023



Matt Hancock MP and Lucy Frazer MP

By email only:
[REDACTED]@parliament.uk

Dear Mr Hancock & Ms Frazer,

Thank you for your letters to Tony Juniper and Marian Spain regarding Natural England's position on the land quality of the proposed Sunnica Solar Farm in your constituency. They are both aware of your concern and have asked that I reply on their behalf as Area Manager for Norfolk & Suffolk.

Natural England is currently inputting into the examination of Sunnica Energy Farm in our role as the government's adviser for nature conservation. We have been engaged with the Applicant and their consultant Daniel Baird Soil Consultant (DBSC) from an early stage regarding soils and agricultural land classification.

We have been made aware of Reading Agricultural Consultants report commissioned by Say No To Sunnica (SNTS). Our soil specialists have reviewed the report and see a discrepancy between SNTS and DSBC survey results because they are interpreting the data sources differently, which leads them to different conclusions.

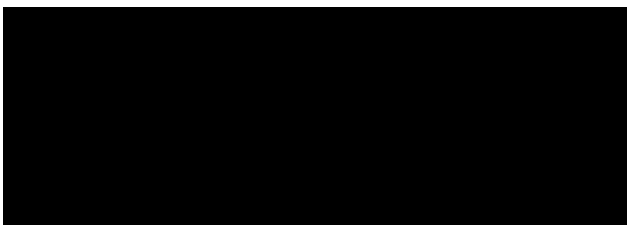
The discrepancy is due to the fact that The 'Provisional' ALC maps used by SNTS, are only intended to be used as a strategic guide and are not accurate at the field scale. These maps do not differentiate between grade 3a and grade 3b and so for development purposes more detailed surveys need to be done for higher accuracy. SNTS have used the strategic guide whereas DSBC have done a detailed survey which is in line with best practice, as using more detailed surveys gives more accurate results.

Their conclusions also differ as SNTS are factoring in irrigation and DBSC are not. Current guidance is that irrigation should not be factored in and so DBSC are in line with the current guidance.

Natural England have reviewed the Soils and Agriculture baseline report and are satisfied with the approach and methodology employed by Daniel Baird Soil Consultants (DBSC).

I trust that sharing this information with you helps to address the issues that your constituent has raised. Please don't hesitate to contact me should you have any queries or require any further information.

With best wishes,



Hannah Thacker
Area Manager, Norfolk and Suffolk
[REDACTED]@naturalengland.org.uk

ENC. Annex 1. Background to Agricultural Land Classification