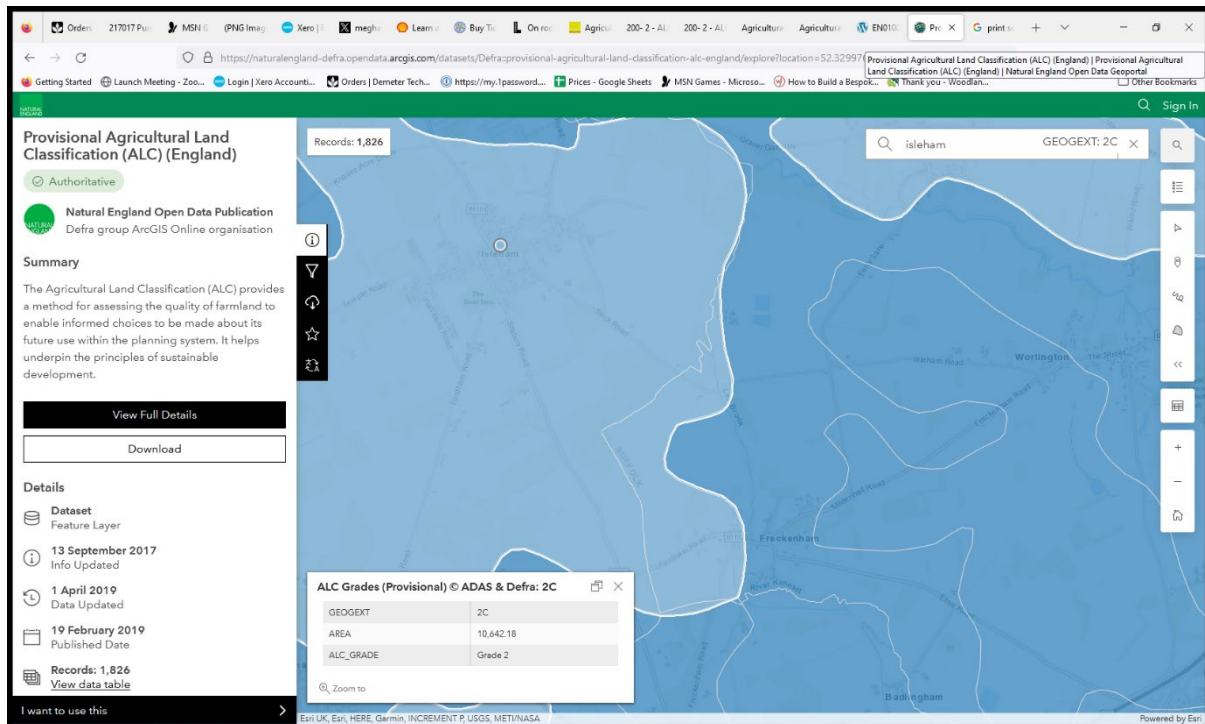


Section 7.4 It is accepted that the predictive BMV map is for strategic planning purposes, however online maps published by Natural England clearly show the land on either side of Beck Rd (Fields E05 and EC01) are predominantly Grade 2 land This mapping, displayed at a scale smaller than 1:250,000 is based on survey data intended for use at 1:10,000 scale

<https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::provisional-agricultural-land-classification-alc-england/explore?location=52.329976%2C0.442373%2C14.00>



7.5 Pinsent Mason say Sunnica does not identify any soil associations as it would not assist in classification, however DBSC does identify by name 3 associations but has failed to take more detailed, easily available information into account as SNTS has (APP 115 5.3.2) out of the 10 identified. (APP 5.3.2)

7.6 Pinsent Mason claim that SNTS have used “outdated” maps to gainsay site assessments. This betrays a lack of understanding of the nature of soils which take thousands of years to develop and therefore will not change in their characteristics which define ALC over a period of fifty years. Earlier ALC methodology has always used the same criteria for observation as now used in the 1988 methodology.

7.9 SNTS have consistently pointed out that the DBSC ALC assessment failed to meet the standard set out by the BSSS guidance. To single out a single point is misleading and incorrect.

On the point raised in the Pinsent Mason letter they fail to explain why the soil pits dug were not contemporaneous with the auger borings and were not dug at points where the ALC grading changes as is good practice. They also fail to note no sub-soil lab analysis was carried out as required by BSSS

The British Society of Soil Science (BSSS) identify areas where reports should be referred for specialist opinion: where the ALC contradicts any other validated ALC survey – MAFF survey on land which forms part of the Sunnica area is >55% BMV compared to DBSC < 1%

BSSS identify areas where reports Fail or are of concern:

Have topsoils and subsoils been surveyed – references to soil pits, auger samples and lab samples should be included- only 6 pits were dug, no sub soil analysis was undertaken **FAIL**

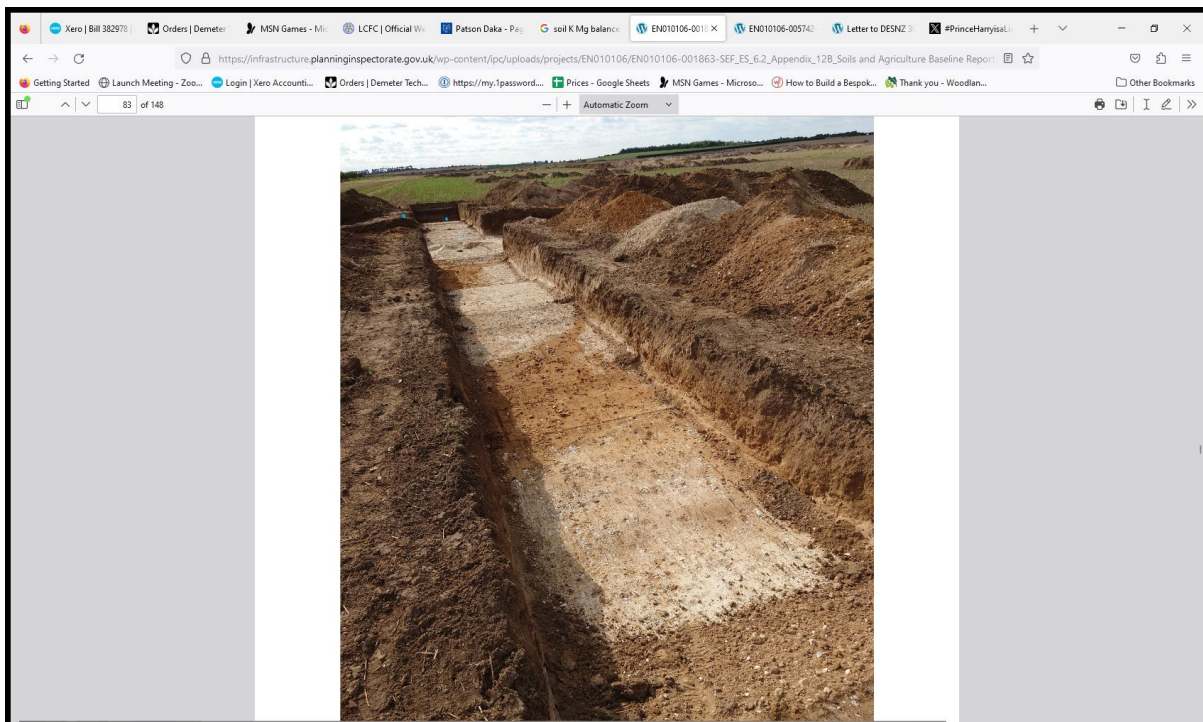
Do auger boring records show moisture balance values for drought- the values given were checked by NE which arrived at different figures for MB values – **CONCERN**

Has detailed soil pit information showing horizon depths, colours and textures been provided? DBSC have used photographs of archaeological trenches (seemingly dug earlier in the season and not representative of the site) to illustrate the soil profiles rather than photographs of the actual pits referred to by DBSC. **FAIL**

App-075 dated 8th July 2021 details the dates of the field work undertaken by Oxford Archaeology between February and May 2021.

DBSC includes pictures of two trenches on Lee Farm and dated Sept 21. There are no grid or other references to identify which fields these trenches were located. Oxford Archaeology (APP-075) include 28 pictures of archaeological trenches in their report. None of these pictures is identical to the pictures used by DBSC, however in several a layer of chalk can clearly be seen lying above further layers of soil. For DBSC to claim that the two trench pictures he presents are typical of the fields is highly misleading. Pits should be dug to a depth of 1.2m.

DBSC picture App-115



Oxford Archaeology detail methods used in the trenching. The photos used by DBSC would appear to show the initial machine opening of the trenches with relatively level removal of the top layer, these were then further excavated

APP-076 trenching report clearly shows how trenches were initially machine trenched but were then dug to a greater depth

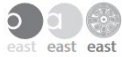


Plate 1: Field W01: Trench 1: Hollow way 736 flanked by ditches 729 (left) and 734 (right), looking south

APP075

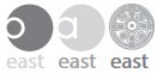


Plate 3: Field E01 Trench 1192, an example of one of the marling ditches (ditch 5726), looking south

In my response at Deadline 10 (REP 10-058) I compared the pictures of the trenches dug in Sunnica East A with the results of the auger borings produced by DBSC. The trenches show a better grade of land and do not reflect the descriptions from the auger borings. Examination of a very few trenches showed distinct anomalies compared to the Auger borings. Rather than showing pictures of the actual pits dug- which were themselves not correctly placed, DBSC has chosen to use pictures of archaeological trenches which support his assertions of the land being shallow and poor.

7.10 Pinsent Mason observe that Natural England actively engaged with the application and topics relevant to its remit. It appears that local area staff engaged with the applicant but with none of the other interested parties. None of the responses from NE were signed by a Soil Specialist. It is a serious concern that, at a time when Food Sustainability is high on the agenda, ALC submitted by developers are not being properly interrogated.