

**Anna Bailey**  
East Cambs District Council  
Leader of the Council

Phone: [REDACTED]  
Mobile: [REDACTED]  
Email: [REDACTED]@eastcambs.gov.uk

8<sup>th</sup> September 2023

Claire Coutinho MP  
Secretary of State for Energy Security and Net Zero

By Email: [REDACTED]@parliament.uk; [sunnica@planninginspectorate.gov.uk](mailto:sunnica@planninginspectorate.gov.uk)

Dear Secretary of State

**Ref: EN010106, Sunnica Energy Farm**

We are writing to you personally in order to highlight the concerns of local residents - concerns that we share - in our capacity as Leader and Deputy Leader of the Council and local Ward Members.

We would like to draw your attention to concerns relating to Natural England and Sunnica's failure to accurately assess the Land Classification of the vast majority of the land intended to be lost to agriculture and food production should the Sunnica scheme go ahead.

We consider the applicant's soil survey in Appendix 12B Soils and Agriculture Baseline report to be incorrect in its statement that the 981 hectare Sunnica site contains only 3.8% best and most versatile soil (BMV). Daniel Baird Soil Consultants (DBSC) surveyed 924 hectares of the site relying on previous surveys for the remaining area. In the survey carried out by DBSC they identified just 0.9% of the site as BMV.

We support the evidence and conclusion from Natural England predictive BMV land assessment that over 50% of the Sunnica site is BMV; Natural England seems to contradict itself repeatedly.

We are very concerned that Natural England refused to engage with the Say No to Sunnica group or any of their expert advisors in spite of 23 email attempts to do so during the course of the Public Examination but engaged with Sunnica only.

We fail to understand why Natural England was prepared to endorse a report by Sunnica that concluded only 0.9% of the site was BMV when its own work showed that at least 50% of the site would be BMV. The difference of 49.1% was completely ignored.

In light of this vast discrepancy why did Natural England fail to support the quite reasonable request for a joint or independent soil survey of the site made on three separate occasions by SNTS and turned down by the Landowners and Sunnica Ltd? If they are so confident of their own findings, what are they afraid of?

Local farmers have worked this land for generations and know from decades of experience which crops will grow best on this soil and produce the best quality of crop. High quality crops of milling wheat, malting barley, rye, potatoes, onions, and sugar beet have been grown on this site for many years. These crops would not have been grown regularly on land with only 0.9% BMV.

Using proven yields and crop rotations from neighbouring farms to the Sunnica site, a 981 hectare farm would produce in excess of 32,000 tonnes of produce per annum. Using current market values this produce would be worth in excess of £6,350,000. As an example, a potato crop would yield 44,000,000 baking potatoes! A standard farm on a cereal only rotation would produce 6,200 tonnes of produce per annum, which would be worth £1,951,000. Why has Natural England ignored the productivity of the Sunnica site?

We also would ask why Natural England ignored the fact that all the land in the Sunnica site has the benefit of irrigation? In the UK only 5% of all arable land is irrigated.

We now address the failure of Natural England to acknowledge the failure of the Soil report presented by Sunnica to reach the standards required by the British Society of Soil Science. The BSSS states that if a soil report fails in just one category it should be referred for further professional scrutiny.

An example of one major fail.

Soil inspection pits should be dug in areas where the soil type is changing.

The soil inspection pits fail the BSSS standards for the following reasons:

- 1- The soil inspection pits were dug in September 2021 just before the application was submitted in November 2021. The auger borings were predominantly carried out in 2015 and 2019. Soil inspection pits should be dug in conjunction with the auger borings to aid the accurate collection of soil collection.
- 2- The soil pits have not been dug in representative areas of the site: 3 pits were dug in known areas of grade 4 land; 2 pits have been dug near headlands.
- 3- All areas of predicted BMV were avoided.
- 4- Two photographs of unidentified archaeological trenches were provided but no photos of the soil inspection pits were provided.

DBSC want to prove that its report is correct and less than 1% of the land they surveyed is BMV.

This contradicts:

- Natural England's predictive mapping
- The ALC mapping
- The detailed Soil Series mapping
- The current cropping of the site
- The local knowledge of the site.

A key part of their evidence should have been a representative number of soil inspection pits that should have been dug across all parts of the site. Each pit should have been fully photographed to show the soils found, backed up by a full set of laboratory results evidencing what the photographs show.

Daniel Baird Soil Consultants Ltd are the soil consultants employed by Sunnica. DBSC produced a soil report with similar shortfalls which was investigated at a Public Inquiry in April 2021 known as the Rippon Motorway Services. The Planning Inspector described the work of DBSC as "largely unconvincing".

In conclusion we would ask the Secretary of State to look closely at the evidence submitted by Sunnica and Natural England. Sunnica has steadfastly refused to allow independent assessment of the quality of the land they claim is not BMV. Natural England has also not produced any evidence supporting its conclusions, in fact by not challenging the assertions made by Sunnica they are contradicting their own data.

The need for sustainable energy is obviously an important issue, however the permanent loss of 984 hectares of food production cannot be underestimated. This land if allowed to be use for Solar production will be lost to food production forever. As we move to a hotter and dryer climate access to farmland with irrigation will be required on a large scale, the cost to implement irrigation schemes will be high, and we would be giving up nearly 1000 hectares of fully irrigated productive farmland which will never be recovered.

The Secretary of State cannot make an informed decision on the Sunnica application as it is a matter of fact that the 924 hectares of contain more than 0.9% BMV. If it is known that the assessment of BMV is incorrect the Secretary of State cannot rely on or trust the DBSC report. Sunnica has refused to allow the site to be resurveyed or cooperate in any way because they know the DBSC report is incorrect.

We would ask the Secretary of State to refuse this application on the basis that the only reliable information she has is that more than 50% or more of the Sunnica site is BMV. Our position is supported by the predictive plans, the current cropping on the site and local knowledge.

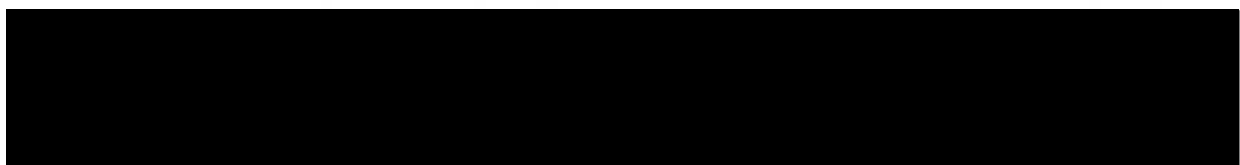
In addition, we would like noted that the RSPB also disagrees with Natural England on the fate of the protection of the Stone Curlew. Although it has been suggested that these rare birds could be relocated the land identified for relocation is currently used to grow potatoes and it is estimated that it could take 5 years for the phosphate to disappear from the soil and a further 5 years for suitable grassland to be established. What happens to these birds in the 10 years it takes to establish a suitable environment?

We would also like to draw your attention to the "Isleham Bomber Site". East Cambridgeshire District Council has requested in a previous submission that this site should be removed from the plan. The site is considered sacred ground to those who live in Isleham. During WW2 it was the courage of those brave American pilots and crew who chose to sacrifice their own lives for the lives of strangers by remaining with their stricken aircraft instead of bailing out and guiding it away from the village. Metal from the crash

remains on the crash site and it is widely considered by experts that human remains are also present. The site is considered locally as a war grave and is maintained as such by the village and is still visited by the families of the American pilots who gave their lives. They died in the line of duty to spare a small community of which they were not a part. Local people now consider it their duty to care for this site and pass on the memory of this act of sacrifice so that it is never forgotten.

So, we would ask the Secretary of State to look closely at the evidence supplied by the Say No to Sunnica team and compare the facts or absence of evidence put forward by both Sunnica and Natural England and on that basis refuse this application.

Yours sincerely



Cllr Anna Bailey  
Leader of the Council

Cllr Julia Huffer  
Deputy Leader of the Council  
Member for Fordham & Isleham

Cllr Kelli Pettitt  
Member for Fordham & Isleham