

5th January 2024

The Planning Inspectorate
National Infrastructure Directorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Dear Sirs

Sunnica EN010106

We, the undersigned have been instructed by the Say No To Sunnica Action Group (SNTS) at various stages during the course of the Sunnica consultation and examination period which closed on 28th March 2023. Our involvement has given us a sound understanding of the application, particularly regarding those aspects concerning soils, land classification and agriculture generally. We have summarised below our continuing concerns with the report submitted by Daniel Baird Soil Consultancy Ltd (DBSC) on behalf of Sunnica Ltd and do not consider that a robust decision on the Sunnica application can be made on the basis of the non-compliant soil assessment submitted in support of it.

- The report submitted by DBSC [APP – 115 -6.2 Appendix 12B] which identifies less than 1% Best and Most Versatile land (BMV) on 924 hectares surveyed does not comply with the professional survey standards set out by the British Society of Soil Science. As the report is non-compliant its conclusions cannot be relied upon.
- The conclusion of the DBSC report is that only 1% of the 924 hectares surveyed is BMV. Natural England's own predictive plan (Attached as Appendix 1), based on extensive detailed mapping shows that 83% of the site is 60% or more likely to be BMV.
- Natural England, in its letter dated 28th March 2023 [attached as appendix 2] to Matt Hancock MP and Lucy Frazer MP does not refer to this plan although we and SNTS have used this plan extensively in our analysis of DBSC's report.
- On a 1,000 hectare application site it is acceptable to use the Natural England 1:250,000 scale predictive plan for soil information. Whilst this scale of mapping is inadequate for detailed interpretation on a field-by-field basis, this application extends across parishes, at which scale it is reasonable to rely on large scale mapping to provide an accurate guide to soil quality. Where Natural England's plans are showing such an extensive area of land as more likely than not to be BMV, it is extremely unlikely that a survey of 924 hectares should find only 1% BMV.

Reading Agricultural Consultants Ltd



Registered Office as above

Company No. 3282982

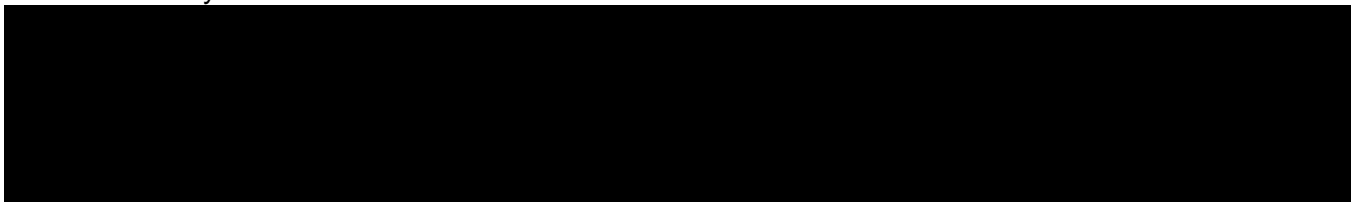
Registered in England



- The point above is also relevant to Natural England's criticism of the use of the 1:250,000 provisional ALC map across a large area. See the map attached at appendix 3 which shows at least 50% of the site to be BMV on the assumption that the grade 3 land in East A is all 3a and the remainder of the land graded 3 is 50% grade 3a and 50% grade 3b. With the size of Sunnica it is acceptable to use this plan to identify BMV.
- Natural England confirms it engaged with the Applicant and DBSC from an early stage, and engaged with statutory and non-statutory consultees throughout the application and examination periods. It is therefore disappointing and surprising they failed to engage with independent soil professionals engaged by the body representing residents of the area around the application sites.
- Given the inability of the undersigned to gain access to the application area in order to carry out a second, independent soil survey of selected areas, our analysis relies in part on highly detailed mapping of soils of the area carried out by MAFF and the Soil Survey of England and Wales. Although these surveys were carried out in the 1960s, soil profiles which have been in situ for 12,000 years will not have undergone any significant changes over the last 70 years that could affect their ALC grade. The findings of these surveys concur with the findings of surveys undertaken by ADAS and Reading Agricultural Consultants relied upon by Sunnica, but they do not agree with the findings of DBSC on the land surveyed on behalf of Sunnica Ltd.
- With the obvious concerns regarding the inconsistencies between the findings relied upon by the DBSC report and the published authoritative small-scale mapping, the land should have been resurveyed to confirm the survey results. We are unsurprised that the applicant landowners resisted repeated requests for access as significantly more than 1% BMV would have been identified across the site.

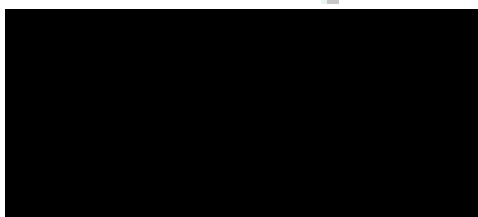
We ask that our submission is taken into account of in the decision-making process and that the evident failure of the applicant to properly assess land quality across the proposed development area is given due weight.

Yours faithfully



Patrick Stephenson BSc (Agric), MBPR
NIAB Regional Agronomist, Director,
Patrick Stephenson Ltd

Sam Franklin BSc, MSc, MSoilSci, MRICS, FAAV, FBIAC
Director, Landscape Land and Property Ltd

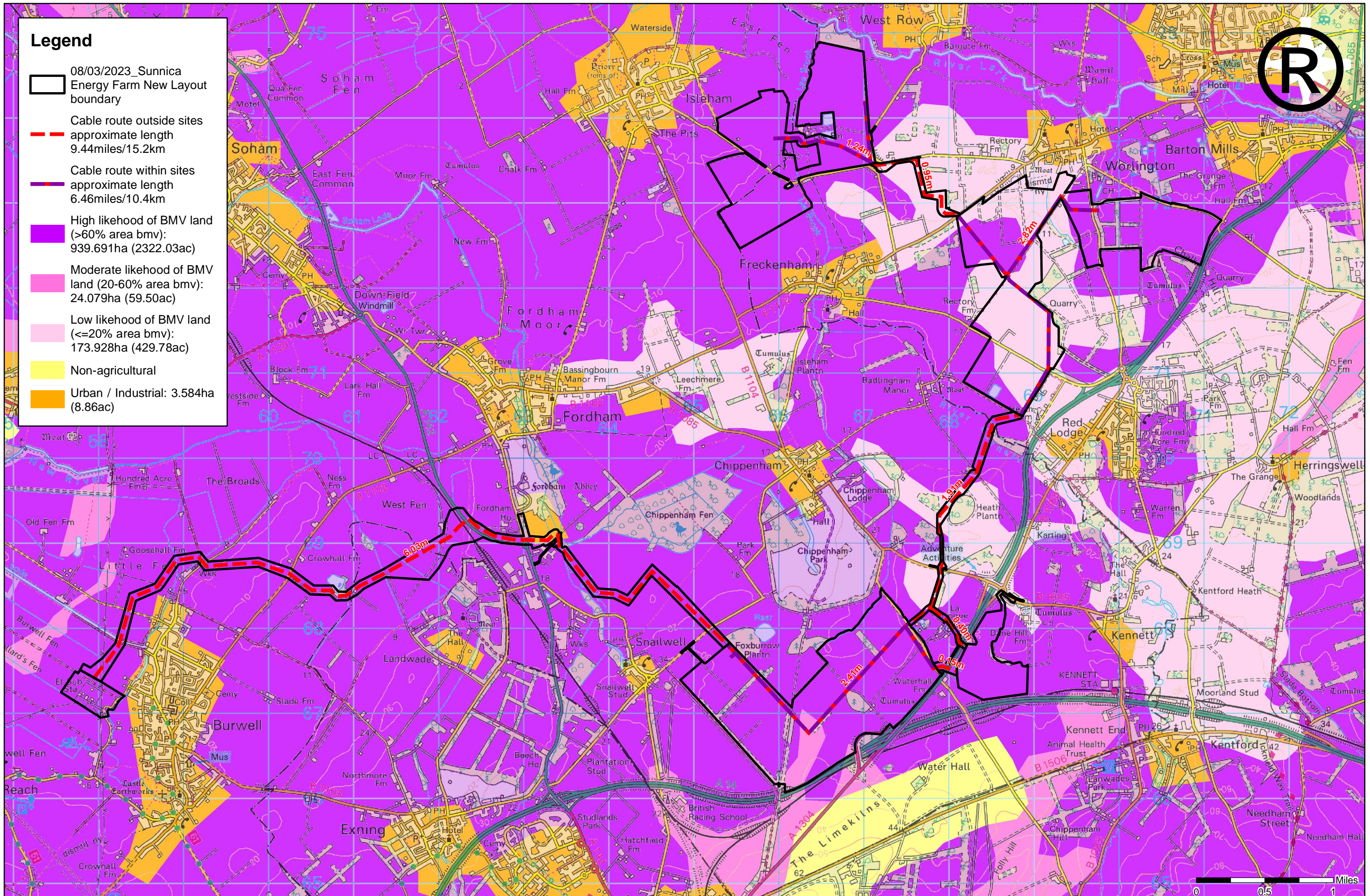


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Director, Reading Agricultural Consultants Ltd,

Sunnica Energy Farm Proposed Layout - (Predictive BMV Land Assessment)



Date: 28th March 2023
Our Ref: MP2023023

17.45.



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,

[REDACTED]

Hannah Thacker
Area Manager, Norfolk and Suffolk

[REDACTED] [@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk)

ENC. Annex 1. Background to Agricultural Land Classification

Sunnica Energy Farm Proposed Layout

