

Date: 13 March 2023
Our ref: 424748
Your ref: EN010106



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Dear Mr Kean

NSIP Reference Name / Code: Sunnica Energy Farm, EN010106

Natural England's comments in respect of Sunnica Energy Farm Project, promoted by Sunnica Ltd

Examining authority's submission deadline 8, 13 March 2023

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The following constitutes Natural England's formal statutory response for Examination Deadline 8.

1. Comments on moisture balance calculations

- 1.1. Clarification has been sought by Natural England on the assumptions and calculations used in the Sunnica Solar Development Agricultural Land Classification (ALC) Droughtiness calculations originally provided within Appendix 12B of the Environmental Statement [APP-115].
- 1.2. Daniel Baird Soil Consultants (DBSC) have provided written clarification within the Technical Note: '*Clarification Requested by Natural England on Agricultural Land Classification*' [REP4-030] with further clarifications provided in an email (28/02/2023).
- 1.3. Droughtiness is the dominant limiting factor across the Proposed Development site, as presented by DBSC and in previous ALC surveys¹
- 1.4. DBSC have provided clarification on their assumptions; including the contingency of an extra 20cm depth with an additional 20% volume of stone made for material below where roots were found. This contingency was applied across all drought limited land surveyed. With the

¹ [REDACTED] - Reading Agricultural Consultants (RAC) survey for a consented minerals development

contingencies included in the assessment, the Droughtiness limitation is often reduced from Grade 4 to Subgrade 3b.

- 1.5. A subset of 6 profiles presented in Appendix 12B have been checked against the Moisture Balance calculations provided by DBSC. As the table below shows, there are some small discrepancies between the presented data and the Natural England calculated values (largely occurring for the moisture balance calculated for potatoes), however these discrepancies are small and do not result in differing ALC grades. Therefore Natural England remains satisfied that the results of the ALC surveys are reliable.

	DBSC Presented data			Natural England calculations			
Sample	MB Wheat	MB Potato	Droughtiness limitation	MB Wheat	MB Potato	Droughtiness limitation	Notes (NE Assumptions)
CP104	-22	-23	3b	-22	-15	3b	MDW=119; MDP=115 (Climate data point 6)
CPa7	-43	-46	3b	-43	-36	3b	MDW=119; MDP=115 hard stone (Climate data point 6)
BF100	-34	-30	3b	-35	-27	3b	MDW=117; MDP=113 (Climate data point 7) H1 and H2 assumed to be all hard stone, although both hard stone and chalk noted
BF113	-56	-52	4	-60	-53	4	MDW=117; MDP=113 (Climate data point 7) H1 and H2 assumed to be all hard stone, although both hard stone and chalk noted
LF4	-28	-24	3b	-28	-18	3b	MDW=121; MDP=118 (Climate data point 1) hard stone
EL14	-75	-71	4	-75	-71	4	MDW=118; MDP=114 (Climate data point 2) hard stone

2. Comments on the Framework Decommissioning Environmental Management Plan (DEMP)

- 2.1. Natural England is now satisfied with the measures set out in the Framework DEMP [REP7-034] regarding impacts on soil and recognises that agricultural soils will be managed, preserved, retained and reinstated in accordance with Department for Environment Food and Rural Affairs (Defra) guidance.

3. Comments on the Report on the Implications for European Sites (RIES)

Natural England notes that there are issues the examining authority considers to be outstanding regarding impacts to European Sites. We wish to make the following comments on those issues to clarify Natural England's position.

3.1. Potential for LSE on drainage and hydrology at Chippenham Fen from grid connection route B

- 3.1.1. Natural England is satisfied with the conclusion that there will be no likely significant effect on Chippenham Fen as a result of hydrological impacts from the cabling route.

3.2. Potential for LSE from light spill on Chippenham Fen

- 3.2.1. Following the removal of panels from the land directly adjacent to Chippenham Fen and based on the information provided by the applicant within the examination, Natural England is satisfied that there will be no likely significant effect on Chippenham Fen from light spill and noise disturbance.

3.3. Evidence from NE used to determine to functional linkage

- 3.3.1. The full document is still in draft and not ready for external publication. We are, therefore, unable to share it in its entirety at this time. However, a summary has now been provided at deadline 7 [REP7-104].

3.4. Likely consequences in the event stone curlew mitigation is not successful or sub-optimal

- 3.4.1. The Framework Operation Environmental Management Plan [REP7-036] sets out the monitoring requirements for the stone curlew offsetting areas. This includes annual monitoring of the offsetting areas with reports being provided to the Ecology Advisory Group. The Ecology Advisory Group, as set out within the Landscape and Ecology Management Plan (LEMP) [REP7-015], will be able to advise on measures required to improve the provision should it be found to be inadequate. These monitoring measures are also within the applicants Report to Inform an Appropriate Assessment [REP5-045]. Natural England is, therefore, satisfied that suitable required offsetting habitat will continue to be provided throughout the scheme.

3.5. Potential for LSE from air-quality in-combination effects at Breckland SPA

- 3.5.1. Although Breckland SPA was mentioned as being vulnerable to air quality in our response at Deadline 2 [REP2-009], this was an error. None of the interest features of Breckland SPA are sensitive to air pollution. Natural England is therefore satisfied that the in-combination assessment provided by the applicant in [REP5-045] considers all relevant designated sites and interest features.

3.6. Level of detail on dust management in CEMP

3.6.1. Natural England has no comments to make related to this issue.

3.7. In addition to the above, it is noted that table 3.1 discusses the presence of an additional record for great crested newst (GCN) at Chippenham Fen. Natural England were made aware of this record. However, on further inspection it was found that this record was an error in the dataset and there have been no valid records of GCN at Chippenham Fen. Natural England, therefore, remain satisfied that there will be no likely significant effect on this interest feature of Fenland SAC.

This concludes Natural England's advice at this time, which we hope you will find helpful.

Yours sincerely

Joanna Parfitt
Norfolk and Suffolk Area Team