

OFH 1- 17th March 2026 PM - Heritage

Good afternoon,

My name is Christopher Lacey, and I live close to this project.

I object strongly to the proposal and encourage the Inspector to recommend refusal.

My oral representation seeks to expand my comments on heritage issues in relation to this proposal where the applicant's approach is flawed and understates the impact on heritage and archaeology. I wish to make 3 points:

1. The baseline characterisation and evaluation coverage for 3 of the 4 sites and along cable/grid connection corridor is insufficient.

The applicant's geophysical surveys and limited trial pit evidence highlight the high archaeological potential and the presence of Prehistoric, Bronze Age, Iron Age, Romano-British, Anglo Saxon, Medieval and post Medieval features across all sites. Despite this recognition the trial pit analysis for sites A, B and D omit large parts of the project area which remain unevaluated.

As an example, it is crucial to understand the interrelationship of the important Romano- British features including roman roads linking these. This evidence may sit under any of the 4 sites within the project area. The archaeological features would be put at significant risk of damage by the applicants proposed intrusive activities such as piling and trenching. Without a full invasive evaluation and finds assessment across all affected areas, including the cable and grid connection corridor this examination cannot reliably assess and reach meaningful conclusions on:

-The likely presence or extent of remains.

-Their relative significance in a local, regional or national context.

-The magnitude of harm from piling and trenching works.

- Whether avoidance or preservation in situ has been adequately and properly considered.

There is an overreliance on no dig assertions and a Written Scheme of Investigation post consent.

This evaluation is not sufficient and does not provide a reliable basis for this examination to consider the potential risks and harms.

The analysis provided does not meet the threshold for T&C PA 2017 -EIA Regulations 18(3).

The applicant should be asked to remedy these omissions.

2. Applicant's assessment of the impact on settings of designated asset - sensitivity and harm classifications disputed. Local authority and other heritage consultees comments identify a potential under assessment of the impact on the settings of designated assets and the contribution made by surrounding farmland and historic landscape character to significance. This may lead to a risk of harm to those assets being materially understated.

3. The distance from project boundaries to important heritage assets is wholly insufficient.

It is vital to acknowledge the massive scale and industrial nature of the proposed solar plant and BESS. The arrays, panels and inverters would sit at well over 3 metres (If fixed) or up to 4 metres (if Tracker Panels) as a minimum approximately twice my height above the ground. This is several times the height of the panels on existing solar plants in the area such as those at Little Staughton Airfield and Manor Farm Pertenhall.

Within approximately 250 m or less of the project boundaries are:

Important Grade 1 listed C12th St Peter's Church Pertenhall and Grade 1 listed C14th St Andrew's Church Great Staughton.

Grade 2* listed C18th The Old Rectory Pertenhall.

Grade 2*listed C16th Place House Great Staughton.

The Scheduled Monuments of the Roman Town and above it those Scheduled Monuments on Staughton Moor the Roman Villa and Roman Bath House. The latter two important Roman features overlooking sites C and D.

It should also be noted that the latter two important Roman features were excavated by Ernest Greenfield of the then Ministry of Works in the summers of 1958 and 1959.

There was clear knowledge of the Roman heritage of Staughton Moor and Great Staughton long before East Park Energy's archaeological adviser 'discovered' the potential extent of the Roman town in 2024.

This harm to heritage assets also includes views to and from Grade 1 listed C13th All Saints Church Little Staughton and to and from the nearby Scheduled Monument the contemporary C13th Double Moated Motte Castle and Manor House and from the PROW causeway between the church and this important medieval feature known as Cretingsbury. These two historic sites overlook the project, and the church is around 160 metres from site B.

The proposal impacts the siting and setting of other key local heritage assets which are also too close to the order limits including: Grade 1 listed C13/14th St Nicholas Church Swineshead and Grade 1 listed C12th St Mary's the Virgin Church Keysoe.

There are also numerous Grade 2 listed assets siting almost adjacent to or within 200m of the various sites.

For these reasons, along with many others, this is the wrong project in the wrong place.

Thank you

ISH 1-18th March 2026 AM - DCO

Good morning,

My name is Christopher Lacey, and I live close to this project. The Examiner should be aware in relation to my second point that my past career has included working with international fund managers and pension funds allocating capital to real assets including infrastructure.

I object strongly to the proposal and to the request for a DCO and encourage the Inspector to recommend refusal.

This request for a DCO is from a commercial organisation looking to make a profit at the tax and billpayers expense rather than a public body looking to develop public goods for which the DCO powers were designed.

My representation touches on issues where the DCO application falls.

I wish to make 2 points:

1.The applicant has failed to demonstrate that the project is in the public interest

The substantial harm that this specific EPE project would cause; the loss of BMV farmland impacting UK food security, impacts on heritage, the countryside and landscape, biodiversity, traffic problems during construction, flooding risk from increased run off combined with the low efficiency of mega scale PV Solar in the UK tip the planning balance in favour of

refusing this scheme.

This inefficiency is exacerbated by the spread-out nature of 4 sites along this 6-mile development site.

These substantial harms are combined with an incomplete, inaccurate and understated assessment of the scope 1, 2 and 3 lifetime carbon emissions assessment for the project. To be in the public interest the applicant should demonstrate that the project will deliver a reduction in lifetime carbon emissions which it fails to do. The applicant should consider the total lifetime carbon emissions generated from the manufacture and shipping of the components as well as building, operating, maintenance, refurbishment and decommissioning of the project. The analysis should also include the fact that the solar panels are likely to be sourced from China and produced using high carbon emissions generating coal fired power. It should also consider that the BESS will be used to store energy generated from higher carbon emissions generating sources such as gas fired power exchanged with the National Grid as well as from the EPE Solar. It has not been demonstrated that this particular project would contribute to the UK Governments Net zero goals and balanced against the substantial harms emanating from it mean that in it is not in the public interest.

2. The applicants' funding statement does not demonstrate that it has long term funding in place to be able to finance the project nor to meet its obligations if granted CPP under the DCO

BSSL Cambsbed 1 Limited which produces shortform accounts in accordance with section 477 of the CA 2006 and is exempted from audit under section 476 of the same Act is thinly capitalised and does not demonstrate any financial strength. The accounts for BSSL Cambsbed 1 Limited and for the holding companies above it in the group structure including the ultimate parent company Lantern Holdco Limited also fail to demonstrate sufficient financial strength to indicate that the applicant would be able to finance the construction, operation, maintenance refurbishment and subsequently the decommissioning of this project without legally binding support from its principal shareholders or through obtaining external funding.

The applicant's Funding Statement -Document Reference: EN010141/DR/4.2 states that long-term funding is not currently in place.

Obtaining long term finance to develop and commission this project would also be affected by the political risks around the continuation of direct or indirect subsidy from the UK taxpayer and billpayers for Mega scale solar PV in the event of a change of government.

The next UK general election is likely in or earlier than 2029 before the projected completion date. Potential institutional and private capital investors would look at this risk and its potential threat to the project cashflows and would be likely to conclude that this makes the project unattractive and unlikely to satisfy their long-term return targets. There is therefore a serious risk that if the DCO were to be granted this project could end up as a stranded asset.

This is a failure to provide an adequate Funding Statement under Regulation 5(2)(h) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure Regs 2009 (APFP) and DCLG guidance dated 2010 on what constitutes a satisfactory Funding Statement.

If the DCO were to proceed despite all the above failings then as a bare minimum the applicant should be asked to provide:

A legally binding parent company or shareholder guarantee covering the full cost of the construction and operation and finance, compulsory purchase costs and other related blight and or similar claims together with a legally binding performance bond to cover the decommissioning.

For these fundamental reasons, the request for a DCO should be turned down.

Thank you

ISH 2 Part 1 18th March 2026 PM – The use of Best and Most Versatile 'BMV' farmland

Good afternoon,

My name is Christopher Lacey, and I live close to this project.

I object strongly to the proposal and encourage the Inspector to recommend refusal.

My representation is on the loss of BMV Farmland where the applicant's approach falls.

I wish to make 3 points:

It is UK National and Local Government policy to protect BMV Farmland from significant development

Approximately 74% by gross area of the 1900 acres to be taken up by the EPE scheme is BMV Farmland. This % figure rises if looked at net of roads, paths, woods, hedges, ponds, ditches and other watercourses.

The National Policy Statement for renewable energy infrastructure (EN-3) states in paragraph. 2.10.28 "Solar is a highly flexible technology and as such can be deployed on a wide variety of land types." In paragraph 2.10.29 "While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible".

The proposal does not comply with local planning policies which should be a material consideration. The Bedford Local Plan 2030 contains Policies 56 and 57 relating to renewable energy.

Policy 56 identifies suitable locations for large scale solar energy developments, these being areas of lower quality agricultural land, existing built-up areas and other areas of previously developed land. The Council's methodology identifies the location of the best and most versatile agricultural land as an area which is not suitable.

Policy 57 requires that a range of impacts have been fully addressed in consultation with affected local communities if a proposal is to be supported. These include the visual appearance and landscape character, local land use, social and economic impacts, traffic and access, surface and ground water, the best and most versatile agricultural land. The current proposal does not meet these requirements in any respect.

This loss of BMV farmland along with that on other Mega-Scale PV Solar sites around the UK has a cumulative impact on UK Food Security. The UK currently imports around 48% of its annual food requirements.

In the report by Science for Sustainable Agriculture 'UK Food Security – The Outlook to 2050' by Dr Derrick Wilkinson former Chief Economist for the NFU/CLA released in September 2025 this 48% figure is forecast to rise substantially between now and 2050.

The impact of Mega scale ground mounted PV solar and the potential loss of BMV Farmland is forecast to impact UK Food Security and is mentioned on page 9 of the report.

In periods of heightened geopolitical risk like the current one food security is a serious concern.

UK Solar inefficiency

This should be set alongside the fact that UK ground mounted PV solar is highly inefficient with observed figures for existing solar plants delivering annualised figures of between 9-11% of the badged capacity or capacity factor. According to regional insolation data for 2024, a 400mw capacity system would have had a capacity factor of 9.88%. For 2025, the sunniest year on record, a 400mw capacity system would have had a capacity factor of 11.09%. The Applicant claims that in its first year of operation it would achieve generation levels giving a capacity factor of 12.4% which is evidentially over optimistic.

On this basis the EPE scheme with a badged capacity of 400mw annual output is therefore likely to produce between 36 and 44 mw annually based on long term data series. It is therefore not possible to justify taking up 1900 acres the majority BMV Farmland. The UK was ranked as the 229th out of 230 most effective countries for ground mounted PV Solar energy by the World Bank in 2020.

Failure to properly assess alternative sites

There has been inadequate consideration of alternative sites or solar energy sources. The process by which the proposed East Park Energy scheme chosen where to locate is severely flawed.

Environmental Statement Volume 2 – Appendix 3-1: Site Identification Report fails to demonstrate that an objective analysis was made. Zone C to the east of the A1 seems to contain the poorest quality agricultural land and previously used land, as well as having the closest and most suitable access to the Eaton Socon grid connection which was which the applicant chose to ignore.

There is no convincing evidence that less productive or non-agricultural options have been properly considered. CPRE studies demonstrate that there is considerable capacity across the country on brownfield land, domestic and commercial rooftops, transport corridors and car parks for solar panels.

The applicants should have first carried out an objective sequential evaluation of other options such as using commercial rooftops and or brownfield and lower quality land in Zone C of their search on the eastern side of the A1. They have instead preferred the lowest cost land option which also happens to be the best food producing land. The applicants have based their scheme primarily on their speculative approaches to farmers and landowners' seeking to option lower priced prime agricultural land on the western side of the A1 which should have been excluded as BMV farmland which is damaging UK Food Security.

The applicant has not demonstrated that the proposed use of BMV agricultural land is necessary as it is required to do by EN3.

Other superior sustainable power options

Alternatives to building mega scale ground mounted PV solar on UK BMV farmland for generating clean energy include offshore wind and small modular nuclear reactors 'SMRs', such as the 3 being developed with Rolls Royce and rolled out in Wylfa Anglesey with a badged capacity of 470 mw and a capacity factor of 470mw of electricity. This efficient and sustainable SMR site will take up approximately 10 acres of land. The Wylfa plant is estimated to be capable of being operational by the early 2030s.

It would take only 7 offshore wind turbines to produce a more reliable and consistent supply of power annually without the loss of 1900 acres of irreplaceable BMV farmland.

For this along with the many other reasons, this is the wrong project in the wrong place

Thank you

ISH2 Part 2 18th March 2026 PM – Construction Traffic

Good afternoon,

My name is Christopher Lacey, and I live close to this project.

I object strongly to the proposal and encourage the Inspector to recommend refusal.

One of my concerns is construction traffic and the unsuitability of the local rural road network.

According to the applicant's Construction Traffic Management Plan, the construction phase would involve 5,278 HGV deliveries – equivalent to 10,556 two-way HGV movements – plus 790 light goods vehicle deliveries, or another 1,580 two-way movements over the 30-month construction period. In addition, during the 18-month peak construction phase there could be between 700 and 854 daily two-way staff trips associated with the workforce.

Those worker trip numbers rely on ambitious assumptions about construction workers carsharing. Construction workers typically travel from a wide geographic area in individual vehicles. If the applicants' assumptions do not materialise as modelled, the number of daily vehicle movements could be significantly higher than predicted.

Even taking the applicant's numbers at face value, they represent many thousands of additional vehicle movements on a rural road network that was never designed for this level of heavy construction traffic.

It is unlikely that workers would use the main B645, B660, B661 routes to access the proposed sites instead using sat nav to find the most direct route causing major disruption and materially increasing accident risk.

The key corridors identified include the B645, B660 and B661, are narrow rural roads used daily by residents, cyclists, horse riders, agricultural vehicles and school buses serving secondary schools Kimbolton School and Longsands Academy in St Neots along with several primary schools. The B645 is already well known locally as a dangerous road, with tight bends, limited visibility and sections where large vehicles already struggle to pass safely.

In a real-world example. At the Cleve Hill Solar NSIP project in Kent, restrictions known as "golden hours" – periods when construction traffic was banned from local rural roads – were built into the construction arrangements from the outset. Despite those measures, residents living nearby described the experience of the construction phase as "a nightmare," with large numbers of heavy vehicles moving through rural communities for prolonged periods, causing disruption and damage. This example demonstrates that even where mitigation exists, the scale and duration of construction activity can still impose significant negative impacts on surrounding communities.

The applicant would need to build many miles of temporary internal roads within the site to address the inefficient strung-out nature of the 4 sites making up the EPE scheme across a 6-mile span.

During the examination the applicants' traffic consultant flagged an important deficiency in the EPE scheme stating that until the internal roads have been built the construction traffic will be accessing the sites using the totally unsuitable local B and country road/lane network through villages including the narrow access surrounded by historic listed buildings through Great Staughton. The applicant should be asked to clarify their strategy on this aspect before the next stage of the examination detailing how long would it take to build the internal access tracks.

The EPE scheme would also require significant enabling infrastructure works by the National Grid and UK Power Networks in the vicinity of the grid connection at Eaton Socon. This would generate additional traffic at the same time. The applicant's plan has not considered that this project is likely to be taking up local resources including labour and local roads generating construction traffic at the same time and on the same roads as the other major projects in the area namely Universal Studios Theme Park, Luton Airport expansion and East West Rail as well as major housing proposals at Tempsford and Dennybrook.

The applicant, the Department of Transport and National Highways, surrounding regional and local authorities, and the Planning Inspectorate should consider the cumulative impact of these major developments potentially taking place at the same time. This has not been done. It must be wrong to consider this project in isolation from the other NSIPs.

The applicants' proposal that the cumulative impact of the project taking place at the same time as other NSIPs should only be assessed within 10 km of the order limits is entirely ridiculous and inadequate. In previous NSIPs the cumulative impact of this and other surrounding NSIPs with the magnitude of those taking place in Bedfordshire and Cambridgeshire potentially at the same time as the East Park Energy proposal should be assessed together and their combined cumulative impact considered.

Ultimately, these failings highlight a more fundamental problem. The scale of construction traffic required for a project of this magnitude is simply incompatible with the narrow rural road network that serves these villages. Risks to road safety, disruption, potholes and the pressure on local infrastructure would be a direct consequence of placing a vast industrial-scale energy development in this rural landscape lacking the transport infrastructure to support it.

Based on the construction traffic impacts alone this location is fundamentally unsuitable for a development of this scale. If those impacts cannot be safely and credibly mitigated, which the applicants' plans fail to demonstrate, then the only responsible conclusion is that this scheme should not proceed.

This is the wrong project in the wrong location

Thank you

FOOD SECURITY

Outlook to 2050



September 2025

Lead author:
Dr Derrick Wilkinson
(former NFU and CLA chief economist)

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Science for Sustainable Agriculture provides a platform for like-minded individuals and organisations to champion and explain the vital role of science and technology in safeguarding our food supply, tackling climate change and protecting the natural environment, as well as to expose, comment on and challenge unscientific positions or policy decisions in relation to sustainable agriculture.

Further information about Science for Sustainable Agriculture is available at www.scienceforsustainableagriculture.com

Executive Summary

Farmland losses risk UK food security crisis

This report examines prospects for UK food security to 2050, based on historical land use and agricultural production trends. The analysis was led by former NFU and CLA chief economist Dr Derrick Wilkinson.

The report draws on an analysis of official UK government data for the past 25 years to establish historical trends in agricultural land use, yields and aggregated food production.

Using AI-assisted economic modelling (Long Short-Term Memory (LSTM) forecasting), the analysis then uses these historical trends to develop forward-looking projections, based on a range of scenarios in terms of land use policies and population growth.

The report finds that, over the past 25 years, we have been losing farmland at a significant rate (771,000 hectares or 4.4%), placing downward pressure on our food production capacity.

Since 2000, while UK agricultural production per hectare has increased by 15% due to yield improvements, the overall rise in aggregated food production was limited to 10% because of the decline in farmland area. As the UK population increased from 59 million to 68 million, this equated to a 5% fall in domestic food production per capita, and a 12% decline in self-sufficiency in primary agricultural products over the period.

Importantly, the 25-year analysis also points to declining trends in both domestic agricultural yields and food production over the past 10-15 years. This can be attributed to a range of climate, market and policy-related factors, including challenges of extreme weather, rising farm input prices, loss of key crop protection products, tighter restrictions on input use, and a greater focus on production-limiting farm policy incentives.

Looking forward, the analysis predicts that full implementation of Government land use policy targets for housing, renewable energy, habitat restoration, agri-environmental measures and tree planting over the next 25 years will dramatically accelerate the rate of farmland loss and constrain productivity gains, placing even greater strain on the nation's ability to feed itself.

In a worst-case scenario, up to 23.7% (3.965 m/ha) of the current Utilised Agricultural Area (UAA) could be at risk, with most of it (80%) arable rather than livestock land.

In a high net migration scenario with a UK population of 80 million in 2050, and without radical farming and land use policy change to boost agricultural yields on our more productive farmland, the amount of food produced on UK farms is projected to fall by over 32% (or by 39% per capita).

Expressed on an 'all foods' basis, a 32% reduction in UK primary agricultural production implies that domestic food security levels could fall significantly from 60% at present, dramatically increasing our dependence on food imports.

The overriding conclusion is that if we wish to capture the many benefits of the environmental measures being integrated into farming and land management policies, while maintaining the transition to net zero through carbon sequestration and renewable energy, **it is imperative that we find new and innovative ways to improve agricultural yields on farmland remaining in production to protect domestic food security.**

This will require better co-ordination of policies across government departments with responsibilities for agriculture, the environment, biodiversity, climate change mitigation, energy production, food security and trade.

It will also require changes to the way government support is allocated so that measures to increase domestic agricultural production sustainably on our most productive farmland are prioritised.



We are struggling to keep up with the loss of farmland over the past 25 years, and new competing demands for land over the coming years to address a range of environmental concerns, along with rising demand for food from a growing population, mean we must find new and innovative ways of producing more food from what land we have. For too long food production has been ignored, and the loss of farmland poses a very serious risk to domestic food security.

Yield improvements have not kept pace with rising demand for many products, which has meant increased reliance on food imports. With planned new farming and land use policies and the transition to renewables for the net zero ambition, farmland losses are set to accelerate and domestic production will fall even further behind the demands of a rapidly growing population. If we are to continue with these environmental and net zero policy objectives, yield improvements on the land remaining in production are the only way of protecting our food security.



Dr Derrick Wilkinson, lead author



Key Messages

Agricultural land is being lost at a significant rate:

- Over the past 25 years we have lost some 771,00 hectares of agricultural land, around 4.4%.
- By 2050, in the best-case scenario (Business-as-Usual, BAU), which continues trends over the past 25 years, the UK could lose a further 835,000 hectares of agricultural land, about 5% of the current area.
 - Of that, 316,000 hectares of arable land would be lost, about 5.8%, and 519,000 hectares of livestock land, about 4.6%.
- In the worst-case scenario (Maximum, Max), incorporating full implementation of the government's environmental and net-zero ambitions, the UK could lose nearly 3.965 million hectares of agricultural land, about 23.7%.
 - Of that, 3.165 million hectares would be arable land, and 800,000 hectares of livestock land. over 260% above 2024 levels, depending on the scenario and population growth.

Domestic food production could fall by up to 32% by 2050:

- Without substantial yield improvements, using the trends in agricultural production over the past 25 years and projecting forward to 2050, in the best-case scenario, home-grown food production could fall by over 7%.
- Factoring in population changes in the worst-case scenario, incorporating full implementation of the government's land use, environmental and net-zero ambitions, UK food production could decline by as much as 32%, or 39% per capita, by 2050.
- On an all-food basis, this implies that domestic self-sufficiency in food could fall significantly from 60% at present, dramatically increasing our dependence on food imports.

Food supplies set to become increasingly reliant on imports:

- In either case, **the direction of travel is clear**, and without a radical rethink of food, environmental and land management policies, the UK looks set to be increasingly reliant on imported food over the coming years, with worrying implications for domestic food security.
- To maintain current levels of food supplies per capita, net imports could increase dramatically, ranging from nearly 160% to over 260% above 2024 levels, depending on the scenario and population growth.

Introduction

The UK's agricultural landscape has always been changing but, over the past 25 years from 2000 to 2024, the rate of change has been accelerating as it adapts to diverse pressures. This AI-assisted report poses a critical question:

Will the UK be able to feed itself in another 25 years, by 2050?

While many factors will influence the course of events over the coming years, this report focuses on the two overriding issues concerning domestic food security:

How much farmland do we have, and how much food do we produce with that land?

Looking back over the past 25 years, the report analyses official statistics from Defra's *Agriculture in the UK* annual reports to quantify changes and trends in areas of arable and livestock land, and the production and supplies of food products. It reveals a modest decline in land used for farming (UAA) over that period, and reveals a mixed picture of adaptation and vulnerability amongst the various foods produced that led to a 12% fall in food self-sufficiency¹.

Looking forward to 2050, the report then uses the detailed official government historical data from the past 25 years and the environmental, land use and net-zero policies currently advocated by the UK government to estimate projections to 2050, with a focus on the aggregate domestic supply and demand for food².

While the discussion of historic food production reviews where we were at the start of the historic reference period and currently, the forecasts use *all* time series data, not just the start and end points. Rather than simple linear forecasting, such as drawing a line through the two points, this paper uses the more complex Long Short-Term Memory (LSTM) method that specifically takes account of the many non-linear issues, like weather and policy changes, affecting agricultural production.

Using LSTM forecasting we consider three potential futures³: Business-as-Usual (BAU) Forecast: continues historical trends with modest productivity gains; Moderate (Mod) Scenario: assumes a moderate implementation of the various policies currently proposed by the government; and Maximum (Max) Scenario: assumes the most ambitious implementation of those policies. For a view on the change in demand for food that can be expected over the next 25 years, for each scenario we also consider how the UK population is likely to grow.



¹ Domestic agricultural production as a percentage of total supply of agricultural products, calculated on a tonnage basis, from AUK Chapters 7 and 8.

² While this approach conceals the many significant differences between foods, it provides a useful overview of outlook for domestic food security.

³ See Appendices for notes on LSTM forecasting and the three outlook scenarios.

Historical Trends: Resilience in a Shrinking Landscape

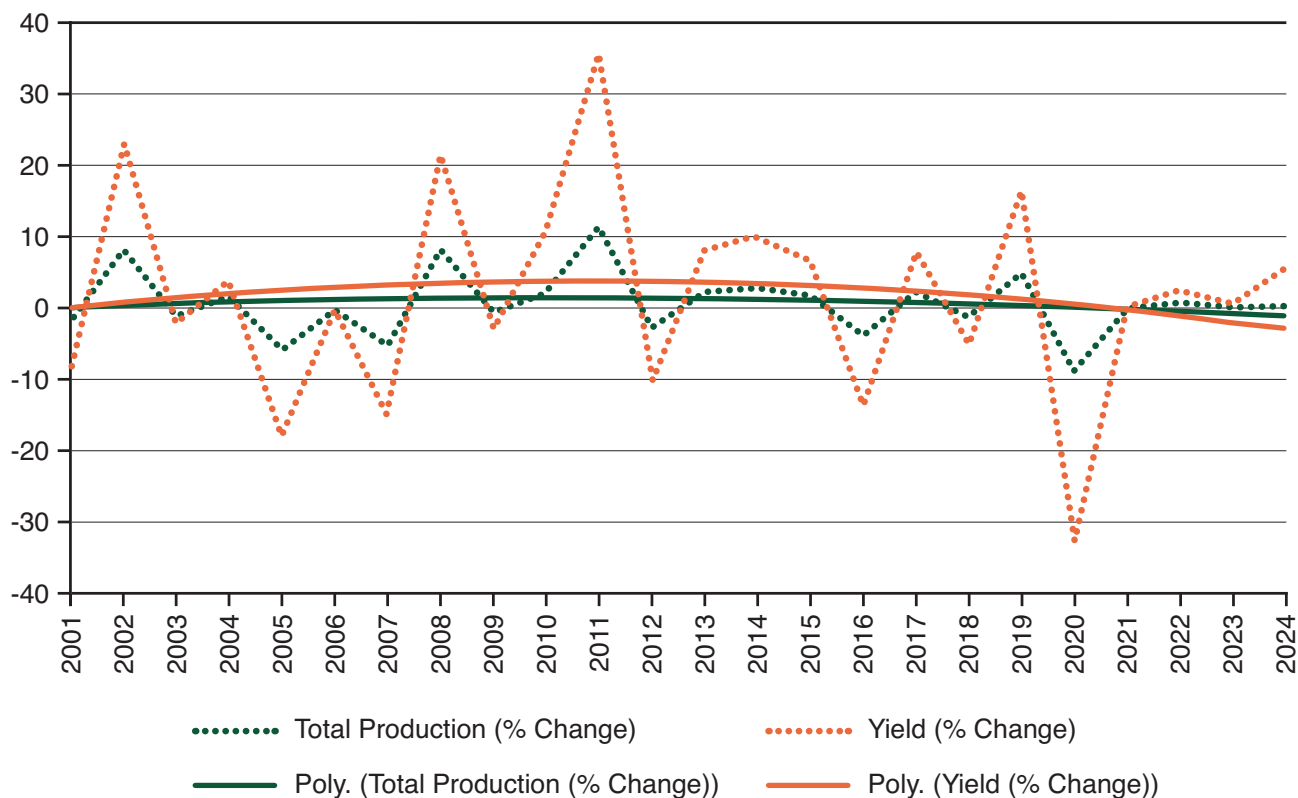
From 2000 to 2024, UK agriculture showed modest resilience despite a shrinking Utilised Agricultural Area (UAA). The UAA, covering arable fields, grasslands, and rough grazing, fell by about 4.4%, from 17,531 thousand hectares to 16,760 thousand hectares, a loss of 771 thousand hectares. This decline, at an average annual rate of -0.19%, was driven mainly by woodland expansion, urban development, and agri-environmental policies, reflecting a shift toward greater focus on reducing the environmental impact of agriculture.

The UAA's composition shifted unevenly. Arable land, used for crops like wheat, vegetables, and oilseeds, declined by 3.23%, from 5,605 thousand hectares to 5,424 thousand hectares, losing 181 thousand hectares. Livestock land, including improved and permanent grassland and rough grazing, declined faster, by 5.0%, from 11,926 thousand hectares to 11,336 thousand hectares, a loss of 590 thousand hectares. This slightly increased arable land's UAA share from 32.0% to 32.4%, and reduced livestock land's share from 68.0% to 67.6%.

Despite the fall in UAA, sectoral productivity gains led to an overall increase in production per hectare of about 15%, from 2.87 tonnes per hectare in 2000 to 3.3 tonnes per hectare in 2024. This contributed to a 10% rise in total domestic production, from 50,357 thousand tonnes to 55,365 thousand tonnes. Per capita production, however, declined from 853 kilograms to 814 kilograms, as the population grew by 15%, from 59 million to 68 million.

While there has been considerable volatility in both production growth and yield improvements over the past 25 years, the polynomial trend lines for both show that they have been slowing over the past 15 years. This suggests that sustaining production will require significant new innovations to boost yields, as farmland loss continues, or we risk a serious deterioration in food security.

Productivity changes

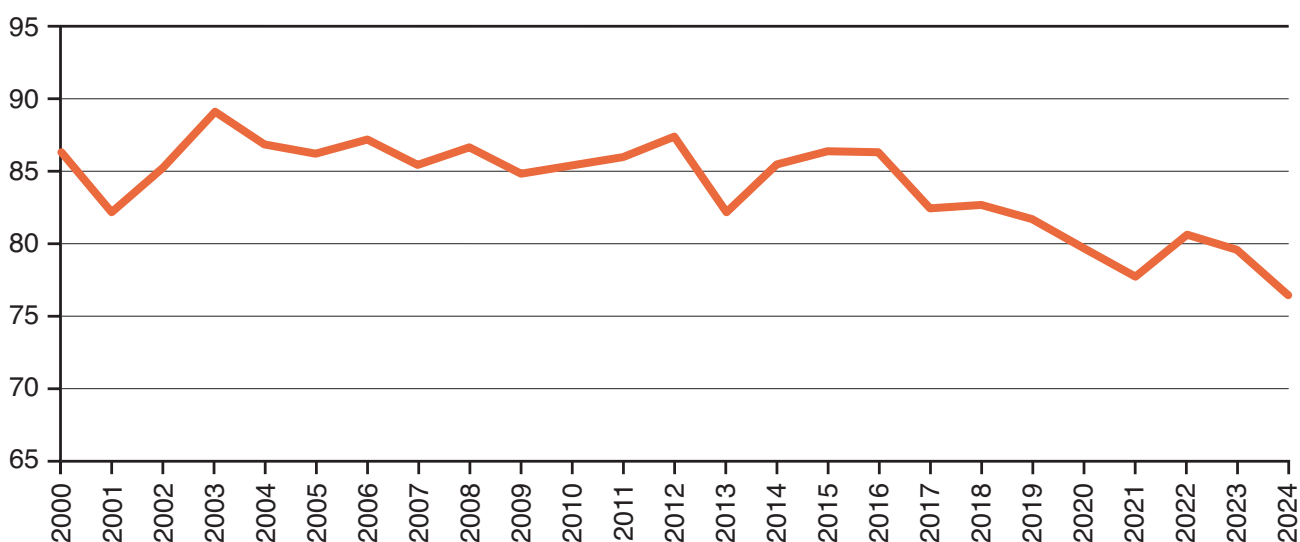


The Common Agricultural Policy 2008 Health Check and associated environmental regulations (e.g. Nitrate Vulnerable Zones and environmental stewardship schemes) are considered to have played a role in slowing UK agricultural yield growth by reducing productive land and limiting fertiliser inputs, directly affecting output. Other climate, market and policy-related factors in recent years, such as challenges of extreme weather, rising farm input prices, loss of key crop protection products, further restrictions on input use, and production-limiting subsidy incentives, are also likely to have contributed to the slowdown in productivity growth over the past 10-15 years.

However, the impact has varied by region and crop – arable farms in eastern England faced more constraints than livestock farms in upland areas. Quantitatively, analysis of DEFRA data suggests that UK average cereal yields increased by just 0.5% annually from 2010-2020, compared to 1-2% in the 1990s.

Total domestic supply⁴, adjusted for net imports, showed growing reliance on international trade. Net imports increased by some 17,131 thousand tonnes between 2000 and 2024, supporting a rise in total new supply from 58,364 thousand tonnes to 72,496 thousand tonnes. This ensured diverse food access despite domestic production constraints. Supply per hectare of UAA rose from 3.33 tonnes to 4.33 tonnes, and per capita supply rose from 989 kilograms to 1066 kilograms due to the increased imports.

UK Food Self-Sufficiency⁵ 2000-2024 (%)



Analysing the correlation between the reduction in UAA and the decline in domestic food self-sufficiency suggests that there is an important relationship between UAA and food self-sufficiency. Specifically, the Pearson correlation coefficient⁶ of 0.687 indicates that nearly half (47.2%) of the decline in self-sufficiency is explained by the loss of UAA. Other climate, market and policy-related factors, as discussed above, are likely to account for the remaining decline.

⁴ Total domestic supply is total domestic production less exports plus imports. Strictly it also includes net stock changes but they are usually small and are ignored here. Total domestic supply is used in this report as a proxy for total domestic consumption, and as an indicator of the changes in net imports needed to ensure domestic food supplies meet demand.

⁵ Domestic agricultural production as a percentage of total supply of agricultural products, calculated on a tonnage basis.

⁶ The Pearson correlation coefficient (r) measures the strength and direction of the linear relationship between two variables like food self-sufficiency and UAA, with r ranging from -1 to 1. A value of r = 1 indicates a perfect positive linear relationship, r = -1 a perfect negative linear relationship, r = 0 no linear relationship.

Projections to 2050: Overview of Farmland Changes

Looking forward to 2050, on current trends another 835,000 hectares of farmland will be lost. In the worst case scenario, with the maximum implementation of environmental and net zero plans, nearly a quarter of all farmland could be lost (3.96 million hectares), with most of it being arable rather than livestock land.

Agricultural Land Areas by Type

	2000	2024	2050		
			BAU Forecast	Mod Scenario	Max Scenario
Total UAA ('000 ha.)	17,531	16,760	15,925	15,084	12,795
Arable Land ('000 ha.)	5,605	5,424	5,108	4,315	2,259
Arable % of UAA	32.00	32.40	32.10	28.60	17.65%
Livestock Land ('000 ha.)	11,926	11,336	10,817	10,769	10,536
Livestock % of UAA	68.00	67.60	67.90	71.40	82.34

Arable land continues to face pressures for housing and infrastructure, but also faces new environmental policy driven pressures, including from afforestation, biodiversity renewal, carbon sequestration, biofuels, and solar farms. Livestock lands, by contrast, can often more easily align with practices such as low-impact grazing, re-wilding and carbon sequestration, and are often less suited to alternative uses such urban and energy projects.

Land Use Implications of Solar Farms and Net-Zero Energy Transitions

Solar farms and net-zero initiatives, key to the government’s energy strategy, pose serious demands on farmlands. The latest data indicate that ground-mounted solar farms currently occupy some 15,580-21,200 hectares of land, with over 2,500 hectares on productive farmland⁷.

Projections suggest that solar farms could cover 50,000 hectares in moderate scenarios or 150,000-200,000 hectares in extremes, targeting 70-90 gigawatts by 2050. Agrivoltaics, combining panels with grazing or crops, could mitigate 20-50% of losses. However, land sparing – dedicating prime land to higher-yield farming and non-prime areas to solar – may be more effective in safeguarding food production while improving biodiversity.

According to studies by the Climate Change Committee and DEFRA, other net-zero energy sources, like bioenergy crops, could repurpose a further 200,000-500,000 hectares, accelerating UAA loss compared to the historical rate of 771,000 hectares over the past 25 years. This risks further constraining the farmland area available for food production.

⁷ The CPRE (Countryside Charity) recently reported that 59% of England’s largest operational solar farms (each over 30 MW) are located on productive farmland, with 31% of their total area (approximately 827 hectares) classified as “best and most versatile” (BMV) land (Grades 1, 2, and 3a).

Population Outlook and Food Demand

While the available farmland is a key high-level measure of our ability to produce food, population growth can be used to estimate future food demand.

The UK's population is projected to grow from 68 million in 2024 to 75 million (Baseline) or 80 million (High Migration) by 2050, based on ONS projections and net migration trends.

These outlooks significantly shape food demand, and point to intensifying pressures on a shrinking agricultural land base.

In the Baseline scenario, a 10.3% population increase drives proportional food demand growth. With production projected to decline 7-32%, per capita production falls from 814 kg to 686-499 kg, and per capita supply drops from 1066 kg to 933-880 kg.

The High Migration scenario, with a 17.6% population rise, heightens demand even further. Per capita production decreases to 644-468 kg, and supply falls to 875-825 kg.

These outlooks significantly shape food demand, and point to intensifying pressures on a shrinking agricultural land base. Both scenarios underscore rising import dependency, amplifying reliance on volatile global markets, risking supply chain disruptions, and likely increasing food prices.

Implications for Net Imports of Food Supplies

With up to 80 million people to feed in the UK by 2050, in parallel with an increasing global population, food supply challenges will be intense, requiring substantial import increases and posing significant risks for domestic food security.

Sustaining 2024 per capita food supply levels could require dramatic increases in net imports by 2050 in all scenarios. The consequential supply chain risks and price volatility threaten lower-income groups in particular. A policy approach focused more on land-sparing could mitigate this by intensifying domestic production on prime agricultural land, reducing import needs while still releasing land for biodiversity and climate change mitigation objectives.

Estimated % Change in Net Imports Required to Maintain 2024 Per Capita Supply Levels in 2050 (thousand tonnes)⁸

	BAU Forecast		Mod Scenario		Max Scenario	
	'000 tonnes	%	'000 tonnes	%	'000 tonnes	%
Baseline (75m)	26,588	159.70%	29,236	175.60%	38,643	232.10%
High Migration (80m)	31,303	188.00%	33,951	203.90%	43,358	260.40%

Current environmental land management policies and net-zero transitions promise localised environmental gains but risk undermining domestic food security and simply exporting the environmental costs of these domestic policy choices. Similarly, demographic pressures, especially high migration, demand policies linking population and resource planning.

⁸ Percentage change calculated relative to 2024 net imports (16,646 thousand tonnes).

Aggregate Metrics: Visualising the Pathways

Projections to 2050 extend historical trends, factoring in policy-driven land use changes. The business-as-usual (BAU) scenario assumes trend continuation with modest productivity gains. Moderate and maximum ambition scenarios incorporate farmland losses to meet current sustainability targets, including for afforestation, habitat restoration, and the provision of renewable energy.

The table below summarises the key changes to the UK food security outlook suggested by this analysis.

UK Agricultural Aggregate Metrics: 2000-2024 and Projections to 2050

	2000	2024	2050		
			BAU Forecast	Mod Scenario	Max Scenario
Population – Baseline (million)	59	68	75	75	75
Population – High Migration (million)	59	68	80	80	80
UAA (thousand hectares)	17,531	16,760	15,925	15,084	12,795
Total Production (thousand tonnes)	50,357.5	55,364.9	51,489.42	44,291.98	37,426.79
Production per hectare of UAA (tonnes/ha)	2.87	3.3	3.23	2.94	2.93
Production per Capita – Baseline (kg)	853.52	813.9	686.53	590.56	499.02
Production per Capita – High Migration (kg)	853.52	813.9	643.62	553.65	467.83
Total New Supply (thousand tonnes)	58,364.4	72,496.3	70,000.00	68,000.00	66,000.00
New Supply per Capita – Baseline (kg)	989.23	1,066.12	933.33	906.67	880
New Supply per Capita – High Migration (kg)	989.23	1,066.12	875	850	825

In the BAU scenario, the Utilised Agricultural Area (UAA) declines from 16,760 thousand hectares in 2024 to 15,925 thousand hectares by 2050, and total production decreases from 55,365 thousand tonnes to 51,489 thousand tonnes due to land constraints, despite efficiency gains. Total new supply falls slightly to around 70,000 thousand tonnes, with imports trying to cover shortfalls. Per capita production worsens as population growth outpaces output, especially under high migration.

The moderate (Mod) scenario intensifies land reductions, with UAA falling to 15,084 thousand hectares and production decreasing to 44,292 thousand tonnes. Per-hectare production falls further and import reliance grows, with net imports potentially more than doubling to 29,236–33,951 thousand tonnes.

In the Maximum (Max) scenario, aggressive net-zero and biodiversity policies drive a steep UAA decline to 12,795 thousand hectares, a 23.7% reduction⁹. Production plummets 32.4% to 37,427 thousand tonnes, with arable land shrinking dramatically to 2,259 thousand hectares. Net imports surge to meet demand, heightening exposure to global market risks and further threatening food security.



⁹ This aligns with the Committee on Climate Change, (2020), *Land use: Policies for a Net Zero UK*. <https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/> which suggested that one-fifth of agricultural land (approximately 20%) must be repurposed by 2050 to meet net zero goals.

Discussion

This report has provided a high-level overview of some of the key issues affecting the UK's food security. It has used official government data covering land use, yields and food production for the past 25 years to develop forward-looking projections to 2050, adjusted to take account of the land use implications of the environmental and net zero policies currently favoured by the government. The detailed numbers in these forecasts are not as important as the direction of travel and orders of magnitude they suggest. The key message is a clear warning of increasingly insecure food supplies, and that a radical rethink of the UK's agricultural, environmental and net zero policies is urgently required.

As Mark Twain famously said: "buy land, they're not making it anymore". With growing demand for farmland and an increasing population, the only way to ensure food security is to use the land we have as wisely and as productively as possible. To do that, farming and other land use policies must be led by the evidence, which means that a closer and more detailed analysis of the issues raised in this report is now needed.

The pressures on arable land are especially severe, and more detailed examinations of the impacts of government land use and net zero policies on the production of particular crops, including cereals, broad acre vegetables and fruits, should be undertaken as a matter of urgency.

The potential loss of up to 23.7% of agricultural land over the next 25 years – for nature restoration, carbon sequestration and renewable energy in particular – implies that a greater focus on land sparing, rather than land sharing, is needed in land use policies coupled with a greater focus on supporting the adoption of new technology and techniques that can both improve productivity and contribute to reducing the environmental footprint of the land remaining in agriculture.

Land sparing and land sharing are two contrasting approaches to balancing agriculture and biodiversity conservation, with differing impacts on agricultural yields and output:

Land Sparing

Involves applying advanced production technologies and techniques on a smaller area of agricultural land to optimise yields. By delivering higher yields per unit area, larger areas of natural habitat can be spared for biodiversity conservation and the delivery of other environmental goods and services.

Land Sharing

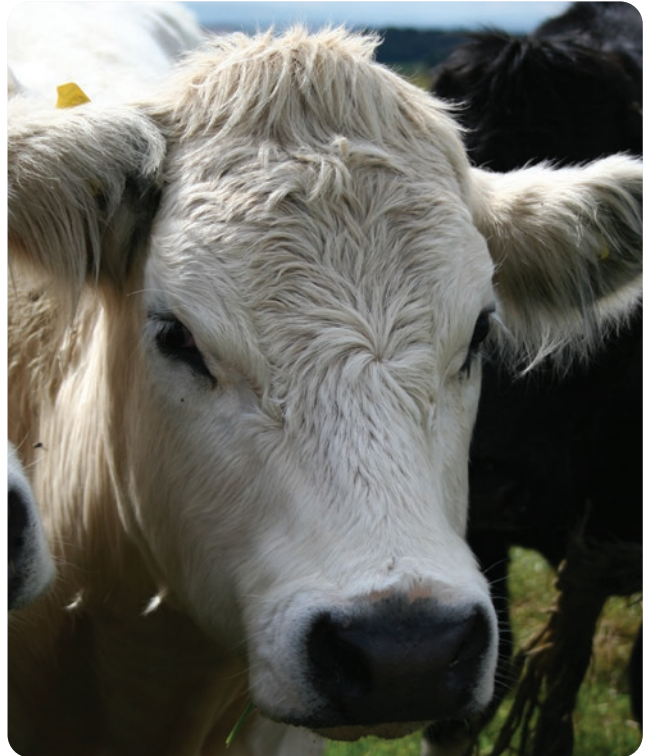
Integrates biodiversity conservation within agricultural landscapes through wildlife-friendly practices, such as agroforestry or mixed cropping, across larger areas of agricultural land. This approach often leads to lower yields per unit of area compared with land sparing policies, as it prioritises ecological objectives over food production, thereby requiring more land to be used to produce the same amount of food.

These are not mutually exclusive policy options, and some commentators have made the case for a 'three-compartment approach' to land use policy, allowing for an evidence-based combination of high-yield production, low-input farming, and nature restoration.

However, this is not reflected in current farm support policies. The continuing focus on land sharing options in government policy, encouraging farmers to adopt production-limiting agri-environmental measures, is likely to further aggravate the declining trend in food production and yield per hectare, with potentially serious consequences for UK food security.

The overriding conclusion of this analysis is that to deliver on biodiversity and nature recovery targets, while maintaining the transition to net zero through carbon sequestration and renewable energy, the consequential impact on food supplies of taking more farmland out of production must be compensated by focusing on scientific innovation to improve agricultural yields.

This will require better co-ordination of policies across several government departments with responsibilities for agriculture, the environment, biodiversity, climate change mitigation, energy production, food security and trade. It will also require changes to the way government support is allocated so that measures to increase domestic agricultural production on our most productive farmland are prioritised.



Appendices

Scenarios

The Business-as-Usual (BAU) Forecast, Moderate (Mod) Scenario, and Maximum (Max) Scenario in the “UK Food Security – Outlook on 2050” report are based on distinct assumptions about future agricultural trends, land use, and policy implementation, derived from historical data (2000-2024) and government ambitions for net-zero emissions and biodiversity. Below is a brief explanation of each:

BAU Forecast: Assumes a continuation of historical trends (4.4% UAA decline, 13.2% production drop from 2000-2024) with modest productivity improvements. UAA falls 5% to 15,925 thousand hectares by 2050, with arable land dropping 5.8% to 5,108 thousand hectares and livestock land 4.6% to 10,817 thousand hectares. Production declines 7% to 44,137 thousand tonnes, reflecting ongoing land loss (e.g., urban sprawl, woodland expansion) and climate variability, offset somewhat by efficiency gains in conventional farming practices. Net imports rise by 148.3-214.5% to compensate for shortfalls, assuming stable trade patterns.

Mod Scenario: Assumes a balanced intensification of environmental policies (e.g., tree planting, peatland restoration), accelerating UAA decline to 15,084 thousand hectares. Arable land drops 20.4% to 4,315 thousand hectares (28.6% UAA share), while livestock land falls slightly to 10,769 thousand hectares (71.4% UAA). Production decreases to 41,489 thousand tonnes due to greater land reallocation for carbon storage and bioenergy crops, with per-hectare productivity stable under conventional methods. Net imports increase 192.9-259.0% to meet demand, reflecting heightened trade reliance.

Max Scenario: Envisions aggressive implementation of net-zero and biodiversity targets (e.g., widespread afforestation, 150,000-200,000 hectares for solar farms). UAA declines 23.7% to 12,795 thousand hectares, with arable land dropping 58.4% to 2,259 thousand hectares (17.65% UAA share) and livestock land 7.1% to 10,536 thousand hectares (82.34% UAA share). Production falls 32.4% to 32,082 thousand tonnes, with modest productivity increases but significant land loss. Net imports rise by 351.4-417.5%, exposing the UK to global market volatility.

All scenarios assume population growth (75 or 80 million), driving higher supply needs and increasing import dependency.

Explanatory Note on LSTM Forecasting

LSTM (Long Short-Term Memory) forecasting is a machine learning technique that uses LSTM neural networks to predict future values in time series data. Compared to traditional methods like ARIMA, LSTMs better handle non-linear, long-term, and multivariate patterns. They are a strong choice for agricultural forecasting because:

- **Captures Long-Term Dependencies:** LSTMs excel at modelling long-term patterns and dependencies in sequential data, ideal for capturing multi-year trends like crop cycles or climate impacts over 25 years.
- **Handles Non-Linearity:** Agricultural production is influenced by non-linear factors (e.g., weather, market dynamics, soil conditions). LSTMs can model complex, non-linear relationships effectively.
- **Adapts to Seasonality:** LSTMs can learn recurring seasonal patterns (e.g., annual harvests or planting seasons) inherent in agricultural data.
- **Robust to Noise:** Agricultural time series often have noise from unpredictable events (e.g., droughts, pests). LSTMs are robust to such irregularities due to their memory cells that prioritise relevant information.

- **Flexible Input Handling:** LSTMs can incorporate multivariate inputs (e.g., rainfall, temperature, prices), which are critical for accurate agricultural forecasting.

To project UK agricultural production to 2050 in this report, Grok 4 followed these steps using Long Short-Term Memory (LSTM) forecasting:

1. Data Collection and Preprocessing:

- **Input Data:** Collected data from 2000-2024 in DEFRA's Agriculture in the United Kingdom (AUK) reports, covering Utilised Agricultural Area (UAA), arable/livestock land, and production for ten food products (e.g., wheat, beef). Integrated weather data (rainfall, temperature), disease records (e.g., cabbage stem flea beetle), and policy changes (e.g., environmental schemes) to capture non-linear effects. This used the commentaries in the AUK reports and a other sources.
- **Data Preparation:** Cleaned and normalised data to a 0-1 range, segmented into 5 to 10-year sequences for input-output pairs. Aligned weather/disease data with production timelines, quantified policy impacts as inputs, and handled missing values via interpolation/imputation.

2. LSTM Model Design:

- **Architecture:** Designed a multi-layered LSTM with memory cells (forget, input, output gates) to model long-term dependencies and non-linear patterns. Included multivariate inputs: weather (seasonal precipitation/temperature), disease prevalence, and policy-driven land use changes.
- **Sequence Length:** Chose 5 to 10-year sequences to capture trends, seasonality, and disruptions from weather, diseases, and policies, leveraging LSTM's suitability for noisy agricultural data.

3. Training the Model:

- **Training Process:** Trained the LSTM on 25-year data using backpropagation through time, optimising mean squared error with Adam¹⁰. The model mapped inputs (e.g., weather anomalies, disease impacts, policy shifts) to production outputs.
- **Scenario Integration:** Adjusted inputs for BAU (5% land loss), Moderate (20.4% arable loss), and Maximum (23.7% UAA loss) scenarios, incorporating policy impacts (e.g., afforestation, solar farms) and projected weather/disease trends.

4. Forecasting:

- **Prediction:** Predicted 2050 metrics (UAA, production, per capita supply) by processing recent sequences and forecasting forward, accounting for non-linear impacts like extreme weather, diseases, and policy-driven land reductions.
- **Output Adjustment:** Adjusted outputs for population growth (75/80 million) and import needs, aligning with scenario-specific land and productivity constraints.

5. Validation and Output:

- **Validation:** Validated using cross-validation, ensuring robustness against weather, disease, and policy noise. Evaluated accuracy with RMSE.
- **Results:** Produced projections, e.g., 7% production drop in BAU (44,137 thousand tonnes) or 32.4% in Max (32,082 thousand tonnes), as per the report.

¹⁰Optimising mean squared error (MSE) with Adam refers to the process of training a machine learning model by minimising the MSE loss function using the Adam optimisation algorithm. This is essentially a means fine-tuning the LSTM to reduce prediction errors for agricultural production by efficiently navigating the complex, non-linear data landscape using adaptive gradient updates.

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