

IP Ref Number [REDACTED]

I would like to add to comments made on my initial representation concerning BMV

As far as I can see there is a direct conflict between solar developments and agricultural production. The reality of the situation is that we either import more food or more energy despite the applicant's suggestion that the area removed is not significant to our food security. They incorrectly assessed the likely land loss to agriculture as 0.6%. The national total set by the government is nearly three times this figure. NFU data shows that over the last 25 years the UK has lost 4.4% of its farmland contributing to a roughly 12% fall in self-sufficiency over that period. UK government figures show that over the period of five years from 2020-2024 cereal production, per year, in the UK was on average 21,416,000 tonnes compared to 23,262,000 tonnes in the period 2015-2019. A fall of 8%. UK imports, in total, from the EU and the rest of the world during 2020-2024 climbed from 20,596,000 to 24,188,000 tonnes. Far from maintaining our self-sufficiency the long-term trend is downwards and compounded by increasing population and potentially more difficult meteorological conditions. During the presentation the applicant was quick to point out that this loss of land could easily be replaced by reinstating land committed to environmental scheme. Obviously, the applicants are ignorant of the current state of farming. They claim the land could be returned to farming within 18 months. A vast majority of these schemes are based on areas which are not profitable to farm and are removed from production for that reason. Most of the schemes are contracted for 3 years or longer and penalties would apply for early removal. The government's own policy has set out significant increases in the demand for environmental management which will increase the land take. So far be it from being a solution to land loss it will more likely increase land loss. Why should farmers be asked to return marginal land to production when solar parks are being built on BMV.

My fear is that we are swapping a land resource which provides a guaranteed supply of food for one which produces a low output inconsistent supply of energy so that during the winter months we can both starve and freeze.

The applicant makes many claims that they are doing their best to reduce development on grade 2 land. The overarching fact is that whatever they decide to do they are still removing this land from production. Why are the safeguarding Class 2? Is it because they are worried about returning the land to agriculture after decommissioning.

The level of BMV is critical to the planning application as government guidelines state that development should be avoided on these areas. In AP-049 Tables 13.8 /13.9 and 13.10 the applicant provides a summary of the land quality of the solar farm, as assessed by sampling, in comparison to the surrounding areas. Their conclusion is that the site is in "a part of the local area that is of comparatively lower agricultural value". For this conclusion they use provisional map data which they state "are not sufficiently accurate for use in assessment of individual fields or on development sites". Examination of the provisional maps for the site gives a value of Class 2 land as higher than 40%, much closer to the local average. In terms of yield, which can also be used to classify land, the applicant's average assessment of 8 tonnes per hectare would give a soil class of 3a.

During the assessment of BMV area the applicant includes non-agricultural land i.e. buildings, roads and trees of 4.6%(EPE). As these are areas not available for agriculture or panels, they should not be included in the BMV calculation. Removal would raise the level of BMV for the site.

On the basis of this representation and hundreds of others I recommend that you reject this application.

Paul Sheard

Resident of Pertenhall