Submission ID: S9214B0DE

Comments on BMV and Self-Sufficiency subsequent to previous submissions Reference [redacted] Paul Sheard
I would like to comment on the updated compliance document with reference to BMV(19th August) Earlier in the examination the Applicant referred to approximately 75% of the site as BMV. In the latest updated documentation paragraph 5.11.34 now presents Grade 2 (21.2%) and Grade 3a (45.2%) giving a total of 66.4% of the total site. However, the table identifies a further 41.6ha of ungraded land which the applicant treats as Grade 2 for assessment purposes. Including this land in the calculation raises the BMV area of the site to approximately 71.8% . Taking out land for buildings, road et. cetera(4.6%) which are not available for agriculture this proportion rises further to 74%. Could the Applicant please explain clearly why the previous stated figure has been reduced to 66.4%. This is a material change and is important because the extent of BMV land is a central point in the assessment of the suitability of the site. The Applicant seeks to downplay the quality of the land loss by comparing it erroneously with the local area using old ALC maps which EPE state are not suitably accurate for planning purposes. These older maps show far higher levels of Grade 2 land, including on the site, than the Applicant's ALC which they claim reinforces their comparison. A far better comparison would be to compare with national levels of BMV at 42.2%.
The Applicant puts considerable emphasis on the point that they are doing their best to reduce development on grade 2 land within the limits of the solar farm. The over-arching fact is that whatever they decide to do they are still removing this land from production. Why are they safeguarding Grade 2? Is it because they are worried about returning the land to its' original status after decommissioning.
The loss of BMV land for non-agricultural purposes has been particularly highlighted by the drought across the country this summer. With yields down by 25-30% in many areas food self-sufficiency has become a higher priority national issue. This year's harvest is due to be the lowest on record with key crop production falling to 18.5 million tons (Energy and Climate Intelligence Unit). The UK food security report finds that over the past 25years we have lost 771,000 or 4.4% of farmland. Over the same period domestic food production per capita has fallen 5% and there has been a 12% decline in self-sufficiency of primary agricultural products. The report also indicates a declining trend over the last 10-15 years in yields and food production. The Applicant claims that self-sufficiency has been stable over the last ten years. This is disputed by Government data which shows that cereal production in the UK has fallen by 8% between 2020-2024 when compared to the previous five year period (DEFRA cereal and oilseed rape production 2025). During the same period imports have risen by 3.5million tons (Gov. UK-Chapter 7. Crops). The applicant seeks to understate this loss by the use of such adjectives as negligible and insignificant.
If we continue to have high levels of net migration by 2050 (half way through the life of the solar farm) we are forecast to lose 32% of our agricultural production (UK food security outlook to 2050) The Applicant seeks to counter the loss of land by claiming that within a year 340,000 hectares of land currently in environmental schemes could become available for cropping. How does this sit with the green credentials trumpeted by the Applicant. All of these schemes are multi-annual and many are established on areas which are unsuitable or unprofitable for farming. It is the wish of the government to increase the area set aside for environmental schemes which would worsen not lessen the problem. Why should farmers be asked to return marginal land to production when solar farms are being built on BMV.
Whatever the scenario we look at food production in the UK has a difficult road ahead to satisfy the needs of a growing population.