

Rosefield Solar Farm

Food Security Explanatory Note

EN010158/APP/8.35
Deadline 5
July 2026
Rosefield Energyfarm Limited



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1. Introduction

1.1.1. This explanatory note has been prepared by Rosefield Energyfarm Limited (the Applicant) to assist the Secretary of State in understanding where matters of agricultural land have been considered within the Development Consent Order (DCO) Application, and to provide further evidence in relation to the use of the Order Limits to support consideration of food production and what that means for food security matters.

1.1.2. The Applicant has provided significant information in the DCO Application documents and with respect to further written questions with regard to the use of best and most versatile (BMV) agricultural land and how it has minimised its use in accordance with relevant planning policy.

1.1.3. The Applicant has noted however the Secretary of State's decision on Springwell Solar Farm (paragraph 4.51) where it is stated that:

"On the impact to food production and food security arising from siting the Proposed Development on BMV land, the Secretary of State agrees with the ExA's application of paragraph 5.11.34 of NPS EN-1 [ER 8.4.14]. This states that, where schemes are to be sited on BMV land, the Secretary of State should take into account the economic and other benefits of that land. The Secretary of State agrees that the Applicant should have included the impacts on food production within its ES."

1.1.4. The Applicant's position is that impacts on food production have been appropriately considered within the ES and where matters relating to food production and security have been raised throughout the Examination to date, these matters have been responded to. However, for completeness and in order to assist the Examining Authority, specific references are provided below where the effects of the Proposed Development on agricultural land have been considered in the DCO Application and to provide further evidence in relation to the use of the Order Limits, to support consideration of food production and what that means for food security matters.

2. Policy Context

- 2.1.1. As noted above, the principal policy relevant to food production and security is at paragraph 5.11.34 of NPS EN-1 (2023 and 2026) which states that:

“The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.”

- 2.1.2. This is reiterated at paragraph 2.10.137 of NPS EN-3. The Applicant agrees that food security matters can be an important and relevant consideration with regard to the economic and other benefits of the agricultural land, however, this should be considered alongside other Government policy and statements including:

- The National Planning Policy Framework (NPPF, December 2024) where the footnote which required local plans to consider the impact on food production (footnote 65 to paragraph 188) was specifically deleted in the latest published version.
- The Secretary of State’s statement in the House of Commons on 18 July 2024 **[Ref 1]** called “Clean Energy Superpower Mission” which stated that: “The biggest threat to nature and food security and to our rural communities is not solar panels or onshore wind; it is the climate crisis, which threatens our best farmland, food production and the livelihoods of farmers”.
- Government environmental land management schemes such as the Sustainable Farming Incentive (SFI), Local Nature Recovery and Landscape Recovery which provide financial incentives for farmers to keep their land out of arable use. As a result of such schemes, latest information published by Defra **[Ref 2]** updated at 17 December 2025 shows that some 576,000 hectares of arable land in England was uncropped (including bare fallow and arable land used for environmental benefit but not in production). An extract from this dataset is provided at Appendix 1 to this document.

3. Consideration of the use of agricultural land in the DCO Application documents

- 3.1.1. The DCO Application documents, and supplementary information provided by the Applicant in response to written questions, provide relevant information on the consideration of agricultural land and BMV agricultural land in particular. Whilst this was not equated directly with food security in the documents, the ExA and Secretary of State can draw conclusions on the impact of the Proposed Development on food production and security on the basis of the information presented. To assist, information is provided in the following documents:

Application Document	Document Ref	Para Ref.	Consideration
Planning Statement	REP4-008	5.5.1 – 5.5.5	How BMV land was considered as part of site selection
Planning Statement	REP4-008	9.21.1 - 9.21.7	Policy on use of BMV agricultural land.
Planning Statement	REP4-008	9.21.19	How BMV land was considered as part of design development.
Design Commitments	EN010158/APP/ 5.9.7	Design Commitment G1	Commitment for certain elements of the Proposed Development (including access tracks, Rosefield Substation, BESS etc) to avoid BMV land as far as reasonably possible.
ES Volume 2, Chapter 12: Soil	EN010158/APP/ 6.2.4	Table 12.3	A breakdown of ALC Grades within the Order Limits.
ES Volume 2, Chapter 12: Soil	EN010158/APP/ 6.2.4	Table 12.4	A breakdown of the land take of key infrastructure components by ALC Grade within the Order Limits.
ES Volume 2, Chapter 12: Soil	EN010158/APP/ 6.2.4	12.7.2	How avoidance of BMV land use was considered as part of design development.
ES Volume 2, Chapter 17: Cumulative Effects	EN010158/APP/ 6.2.4	17.8.31 – 17.8.40	How the quality and quantity of Agricultural Land Quality has been assessed cumulatively in combination with other projects.

Applicant's Response to the Examining Authority's First Written Questions	<u>REP2-087</u>	Q1.18.1, page 94	Response to question from ExA on how the Applicant has considered the economic and other benefits of BMV agricultural land.
Applicant's Response to the Examining Authority's First Written Questions	<u>REP2-087</u>	Q1.18.3, page 95	Response to question from ExA on the Applicants position on consideration of agricultural land for food production, in the context of NPS EN-3 and the 'Powering Up Britain: Energy Security Plan'.

- 3.1.2. It is clear from the above that there is substantial information available which would enable both the ExA and the Secretary of State to draw a conclusion on the use of land for food production and what that means for food security matters.
- 3.1.3. This includes detail on how BMV land was considered as part of the site selection and design process, resulting in only 1.51% of the Site being classed as BMV land. In the wider context of solar NSIPs this is exceptionally low.
- 3.1.4. Additionally, the operational life of the Proposed Development is up to a period of 40 years, which is controlled by a Requirement 18 of the **Draft DCO [EN010158/APP/3.1.8]**. Following this period, the Proposed Development will require decommissioning which would see the land, returned to its previous quality prior to the commencement of the Proposed Development, handed back to the landowner at which point it could return to agricultural use.
- 3.1.5. Several fields within the Order Limits required for the installation of cabling will be retained for agricultural use once the cables have been installed, and there would be full agricultural use within the Grid Connection Cable Corridor once construction has been completed.
- 3.1.6. There is also the potential to use the open spaces between the infrastructure and the land beneath the Solar PV modules for grazing during the operation (including maintenance) phase, and therefore some agricultural use of the Site can occur during the lifespan of the Proposed Development. The Applicant has indicated its willingness to arrange grazing as part of the long-term management regime (and has had positive initial discussions with local suppliers who could provide either sheep or cattle grazing) within the **Outline LEMP [EN010158/APP/7.6.6]**.
- 3.1.7. Further evidence is also provided below in relation to current cropping and yield to further assist.

4. Further evidence on current use of the land within the Order Limits

- 4.1.1. Information on current cropping and yield data has been provided by a representative of a the Claydon Estate, who have approximately 450ha of land farmed in arable rotation within the Order Limits of the Proposed Development. It should be noted that this represents a specific point in time and is subject to crop rotation. There are two further farming operations, the Claridge's and Preston Farms Limited (Ltd), for which detailed cropping information is not available, as well as smaller areas of land belonging to other landowners within the Order Limits including land for Abnormal Indivisible Load access and highways works. The Claridge's and Preston Farms Ltd are discussed in Paragraphs 4.1.4 and 4.1.5. below. The following information should also be viewed in the context of the above, that there is no policy or requirement for farmers to farm their land in a particular way.
- 4.1.2. The land within the Order Limits is predominantly in agricultural use, comprising a mixture of arable farmland and pastures.
- 4.1.3. Approximately 450ha of the land within the Order Limits forms part of the Claydon Estate farming operations, including the production of wheat, beans and oats. The wheat is mainly feed wheat, used for livestock purposes, though some milling wheat varieties are also grown which may be used for flour production. The oats and beans are grown for human consumption, though they often do not make the required specification and are ultimately used for livestock feed. Approximately 10% (45ha) of the land is managed as fallow as part of the crop rotation under the Sustainable Farming Incentive Scheme.

Crop*	Approximate rotation percentage	Approximate Area (ha)	Average Yield	Approximate crop production based on average yield
Wheat	65%	292.5	8 – 9 tonnes/ha	2,486 tonnes
Oats	15%	67.5	6 – 7 tonnes/ha	439 tonnes

Beans	10%	45	3 – 4 tonnes/ha	158 tonnes
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* The crops shown represent an average spread based on recent years. Some years other crops may be grown in addition to those identified in the table. All yields are subject to weather, variation in soil type/condition, seed variety, nutrition/fertiliser application, disease/pest/weed management, establishment and agronomy.

- 4.1.4. A separate portion of the land within the Order Limits is tenanted by the Claridge's. In this area some land is used to breed livestock, including South Devon cattle, a native breed with a stable population. These cattle are sold for breeding elsewhere and used for food production. The livestock also comprises some store cattle of different mixed breeds which are sold for meat. The size of the Claridge's herd is expected to remain stable owing to a replacement land agreement.
- 4.1.5. A further agricultural operation, the Preston Farms Ltd, also tenants and owns land within the Order Limits. Agricultural land within this area is used for growing feedstock and for rotational grazing. In addition to conventional agricultural activities, part of the Preston Farms Ltd land is also associated with the supply of biological materials for research and pharmaceutical purposes. This involves controlled rearing and management of animals, including biosecurity and quarantine type measures. Land use within this area is therefore not for conventional agricultural productivity or food production, and instead forms part of a wider specialist supply chain linked to biomedical and research uses.
- 4.1.6. Existing energy infrastructure is also part of baseline land use, with the National Grid East Claydon Substation constituting 27.48ha of land in the northwest of the Order Limits.
- 4.1.7. In the context of national food production, the proposed wheat, oat and bean production from the Claydon Estate for which information was obtained would represent only a very small proportion of UK output: approximately 0.02% of the 2025 UK wheat harvest (c. 12 million tonnes), 0.05% of the 2025 UK oat harvest (c. 963,000 tonnes) [Ref 3], and 0.03% of the 2025 UK bean harvest (c. 482,000 tonnes) [Ref 4].

5. Conclusions

- 5.1.1. The Applicant has provided evidence through the DCO Application documents and in responses to written questions on the way in which it has met policy in NPS EN-1 and EN-3 to minimise the use of BMV agricultural land and how it has considered the economic and other benefits of that land.
- 5.1.2. As set out in the **Planning Statement [EN010158/APP/5.7.5]** [\[REP4-008\]](#) it is concluded that 94.42% of the Site is non-BMV land, 4.07% of the Site is non-agricultural land and 1.51% of the Site is BMV. Minimising the take of BMV land was a key consideration in selecting the Site and the Applicant considers that the site selection process has successfully limited the Proposed Development's impact on BMV land since the proportion of BMV land within the Order Limits is low at 1.51%.
- 5.1.3. Additionally, as set out in section 3 above, the Proposed Development is temporary and the land would be restored to its previous quality following decommissioning. In terms of continued agricultural use of the land, after interconnecting cables have been installed a number of fields within the Order Limits that are required for the installation of cabling will be retained for agricultural use, and there would also be full agricultural use within the Grid Connection Cable Corridor. The Applicant has also indicated its willingness to arrange grazing around the Solar PV modules as part of the long-term management regime and there would be full agricultural use within the Grid Connection Cable Corridor once construction has been completed, continuing agricultural use on-site during the operational lifetime of the Proposed Development.
- 5.1.4. The Applicant has provided further evidence as part of this submission that the agricultural land within the Order Limits (all land, not just BMV) is producing a very small percentage of the UK's food stock, including approximately 0.02% of the 2025 UK wheat harvest (approximately 12 million tonnes), recognising that this is only a point in time and that there are no policies that require farmers to farm their land in a particular way.
- 5.1.5. There is approximately 450ha of arable land within the Order Limits that is used for agricultural production, which in context is 0.003% of the utilised agricultural area within the UK according to the most up to date Defra statistics **[Ref 2]**.
- 5.1.6. The Proposed Development will therefore have a negligible impact in terms of UK food production and therefore should not carry any weight in the Planning Balance.

6. References

- **Ref 1:** Secretary of State for Energy Security and Net Zero (18 July 2024). Available online: <https://hansard.parliament.uk/commons/2024-07-18/debates/1B2ABCB9-1455-4C86-8E2F-5E763B38E888/CleanEnergySuperpowerMission>
- **Ref 2:** Department for Environment, Food & Rural Affairs (2025). Agricultural Land Use in United Kingdom at 1 June 2025. Available online: <https://www.gov.uk/government/statistics/agricultural-land-use-in-the-united-kingdom/agricultural-land-use-in-united-kingdom-at-1-june-2025>
- **Ref 3:** Department for Environment, Food & Rural Affairs (2026). Cereal and oilseed production in the United Kingdom 2025. Available online: <https://www.gov.uk/government/statistics/cereal-and-oilseed-rape-production/cereal-and-oilseed-production-in-the-united-kingdom-2025>
- **Ref 4:** Department for Environment, Food & Rural Affairs (2026). Agriculture in the United Kingdom 2025, Chapter 7: Crops. Available online: <https://www.gov.uk/government/statistics/agriculture-in-the-united-kingdom-2025/chapter-7-crops#protein-crops-field-peas-and-field-beans>

Appendix 1



Land use on agricultural holdings on 1 June ⁽¹⁾
hectares

	2024					2025				
	England	Scotland	Wales	Northern Ireland	United Kingdom	England	Scotland	Wales	Northern Ireland	United Kingdom
Utilised agricultural area ⁽¹⁾	8,746,900	5,169,877	1,793,713	1,049,591	16,760,080	8,820,972	5,162,804	1,796,124	1,041,338	16,821,238
Total agricultural land (incl. common rough grazing)	9,276,421	5,734,443	1,955,510	1,079,423	18,045,797	9,345,378	5,603,023	1,950,426	1,071,282	17,970,109
Common rough grazing	398,947	579,047	180,305	39,030	1,197,329	398,947	578,721	180,305	38,987	1,196,959
Total area on agricultural holdings	8,877,474	5,155,396	1,775,205	1,040,393	16,848,468	8,946,431	5,024,302	1,770,121	1,032,296	16,773,150
Total croppable area	4,968,220	744,645	265,181	189,421	6,167,467	4,921,923	746,875	269,475	186,269	6,124,542
Total crops	3,567,221	554,154	107,756	46,801	4,275,931	3,517,412	561,672	110,246	46,585	4,235,915
Arable crops	3,454,391	528,632	106,157	44,507	4,133,687	3,400,227	535,331	108,725	44,359	4,088,642
Of which cereals	2,449,715	433,082	52,750	30,613	2,966,159	2,483,569	440,919	57,978	30,410	3,012,876
- of which wheat	1,401,946	98,055	22,741	8,029	1,530,771	1,525,137	108,256	27,980	8,761	1,670,134
- of which barley	849,088	300,380	24,013	20,438	1,193,919	741,528	295,323	23,567	19,481	1,079,899
- of which oats	148,477	27,590	4,190	1,788	182,046	162,476	29,444	4,327	1,814	198,060
Of which potatoes	83,350	29,085	2,876	3,096	118,407	89,780	30,364	3,637	3,187	126,968
Horticultural crops	112,830	25,522	1,599	2,293	142,244	117,185	26,342	1,521	2,226	147,274
Uncropped arable land ⁽²⁾	580,662	33,360	1,634	399	616,054	544,610	29,488	1,415	423	575,936
Temporary grass under 5 years old	820,337	157,132	155,791	142,222	1,275,482	859,901	155,715	157,814	139,261	1,312,691
Total permanent grassland ⁽³⁾	3,364,091	3,846,185	1,348,227	821,140	9,379,643	3,484,223	3,837,208	1,346,344	816,083	9,483,857

Data notes:

(1) Includes cropped area, uncropped arable land, common rough grazing, temporary and permanent grassland and land used for outdoor pigs (excludes woodland and other land).

(2) All arable land not in production, including bare fallow and arable land used for environmental benefit but not in production. Arable land used for environmental benefit but not in production includes pollen and nectar.

(3) Includes sole right rough grazing.

Source: Agricultural Land Use in the United Kingdom at 1 June 2025, updated December 2025
(Accredited official statistics dataset, Defra)



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