

1. Introduction

- 1.1. Fields for Farming (FFF) respectfully submits this written representation to address the significant effects of the Proposed Development on Best and Most Versatile (BMV) agricultural land and the associated socio-economic impacts arising within the host communities. Having reviewed the Applicant's assessments, relevant national policy, publicly available agricultural classifications, evidence on food security and the wider material within the Examination, FFF cannot accept the Applicant's conclusion that the impacts on agricultural land, food production, local farms and the rural economy are minor, negligible or limited in scope. The evidence demonstrates that the loss of this land will have substantial, long-term and in some respects irreversible consequences that are inconsistent with national policy, local policy and the principles of sustainable development.
- 1.2. The Proposed Development would remove a large, coherent block of productive Grade 2 and Grade 3a agricultural land from use for at least forty years. This land is essential to several local farms, many of them tenant, family-run businesses, and sustains the agricultural economy and identity of Sturton le Steeple, Fenton, Littleborough, North Leverton and surrounding villages. This is not marginal or low-quality land; it forms part of well-established rotations, grazing systems and stewardship practices that contribute meaningfully to domestic food production. FFF considers that the Applicant has materially understated the extent and seriousness of these impacts.

2. Policy Context and Use of BMV Land

- 2.1. National policy is unequivocal in recognising BMV land (Grades 1, 2 and 3a) as a finite and valuable resource. The revised National Policy Statement EN-3 requires solar developers to make use of previously developed land, brownfield land, contaminated land and industrial land wherever feasible. Only where the use of agricultural land is unavoidable should it be considered, and even then, poorer-quality land must be selected over BMV land unless compelling justification is provided. This expectation is reinforced by the Written Ministerial Statement of May 2024.
- 2.2. The land proposed for development comprises almost entirely Grade 2 and Grade 3a soils, confirmed through publicly accessible ALC data. This is high-productivity arable and mixed-farming land that plays a recognisable role in food production for the region. The Applicant has not demonstrated that the

use of such land is necessary or proportionate, nor have they shown that a meaningful sequential assessment of alternative brownfield or lower-grade land has taken place. Established planning principles make clear that site searches cannot be constrained by administrative boundaries; yet there is no evidence that the Applicant assessed brownfield land at West Burton or similar large non-agricultural sites despite their proximity and strategic suitability.

- 2.3. Consequently, the use of BMV land at this scale conflicts with national policy and undermines Government objectives relating to food security, agricultural resilience and responsible land use.

3. Food Security and National Considerations

- 3.1. FFF places significant weight on the national context in which the removal of this land must be considered. Independent evidence published by Science for Sustainable Agriculture in the UK Food Security Outlook to 2050 shows that the UK has already lost 771,000 hectares of farmland in the last twenty-five years and could lose up to 3.96 million hectares, or 23.7%, of its agricultural land by 2050 due to competing demands including renewable energy and environmental land-use changes. Domestic agricultural production could fall by up to 32%, with import dependence rising to between 160% and 260% above current levels depending on population growth scenarios.
- 3.2. This report also highlights that solar and bioenergy projects disproportionately displace productive arable land, tightening pressure on domestic food production at a time when yields are plateauing and national demand is rising. Within this context, the loss of a single large block of BMV land is not isolated; it contributes to a cumulative and nationally recognised pattern of farmland decline. The Applicant's conclusion that the loss is "negligible" therefore fails to reflect the independent evidence regarding the declining availability of agricultural land and its direct link to national food security.

4. Local Agricultural Impacts

- 4.1. The land affected by the Proposed Development is not generic farmland; it supports integrated farming systems that rely on specific field parcels for rotational diversity, forage supply, grazing stability and soil stewardship. The displacement of such land will fundamentally alter the viability and configuration of several local farms, particularly those operating under tenancy arrangements. These farms cannot relocate land, and reductions of this magnitude directly erode business security, workforce continuity and long-standing agricultural practices essential to the functioning of this rural area.
- 4.2. In addition to the loss of cropping capacity, FFF also want to emphasise the importance of agricultural by-products generated from BMV land. Straw produced from high-quality arable rotations is indispensable for livestock farming, serving as bedding, feed, and structural fibre within mixed rations. It is also a feedstock for certain green-energy systems and other sustainable operations. The removal of this land will significantly reduce local straw availability, placing pressure on livestock producers who rely on consistent local supply for animal welfare and winter housing. This loss has knock-on consequences for food production and farm economics in ways the Applicant has not assessed or acknowledged. Increased reliance on imported straw or haulage from distant farms will raise costs, increase carbon emissions and undermine local agricultural resilience.
- 4.3. The tenant and family-run farms affected have also managed this land responsibly for many years under medium- and higher-tier agri-environment and stewardship schemes. These schemes promote soil health, wildlife diversity and ecological resilience across the farmed landscape. The Applicant's assertion that the arable land in this area is of "low value to wildlife" does not reflect the reality of stewardship practices or the biodiversity supported by rotational systems, stubbles, cover crops, hedgerows and margins. These active stewardship commitments form part of the baseline ecological value of the land, and FFF seeks assurance that this has been accurately reflected in the Applicant's Biodiversity Net Gain calculations. Nottinghamshire County Council and CPRE have raised similar concerns regarding the ecological value of the land and its omission from the Applicant's assessments.

- 4.4. Farming in this area supports not only agricultural output but the continuation of generational skill, knowledge, and professional identity that cannot be replaced if lost. Even if the land were returned to agriculture after forty years, the community fabric, farming structures and specialist knowledge displaced today would not remain intact.

5. Wider Rural Economic Effects

- 5.1. The agricultural sector in this locality supports a substantial network of rural businesses including machinery dealerships, hauliers, agronomists, contractors, farriers, veterinarians, seed merchants, feed suppliers and rural service providers. The removal of a significant area of productive land reduces demand for these services and destabilises the economics of an interconnected rural system. The Applicant's socio-economic assessment fails to reflect these relationships and places undue weight on negligible long-term employment benefits associated with operational solar infrastructure. Large solar installations do not generate long-term local employment, nor do they compensate for the sustained reduction of agricultural business activity.
- 5.2. Consequently, the socio-economic harm extends beyond the boundary of individual farms and affects the broader rural economy and community cohesion.

6. Cumulative Impacts

- 6.1. This part of Nottinghamshire is experiencing sustained cumulative pressure from multiple major developments and NSIPs, including energy, grid and industrial projects. The Applicant's assessment does not sufficiently account for the combined effect of these schemes on agricultural land, rural character and community wellbeing. Within this wider context, the loss of productive agricultural land contributes to an intensifying pattern of impact that is not adequately addressed by the Applicant.

7. Procedural Concerns.

- 7.1. FFF also wishes to record concerns regarding the limited opportunity available at ISH1 to present the full extent of its evidence on BMV land and socio-economic matters. Given the technical and policy importance of these issues and the volume of material relevant to the Examination, FFF respectfully requests that the Examining Authority consider convening a

dedicated Issue Specific Hearing on these matters to ensure that they receive appropriate and detailed scrutiny.

8. Conclusion

- 8.1. FFF concludes that the Proposed Development would result in the long-term or permanent loss of a substantial area of BMV agricultural land, contrary to national policy and Government guidance. The socio-economic impacts have been understated, and the assessment does not reflect the true extent of harm to local farms, rural businesses or community identity. Independent national evidence on farmland declines and food security further demonstrates that the removal of productive agricultural land is a matter of national concern.
- 8.2. FFF therefore respectfully invites the Examining Authority to recognise that the effects on BMV land and socio-economic conditions are significant, to give these matters substantial weight in the planning balance, and to consider whether the Proposed Development can be justified in this location.