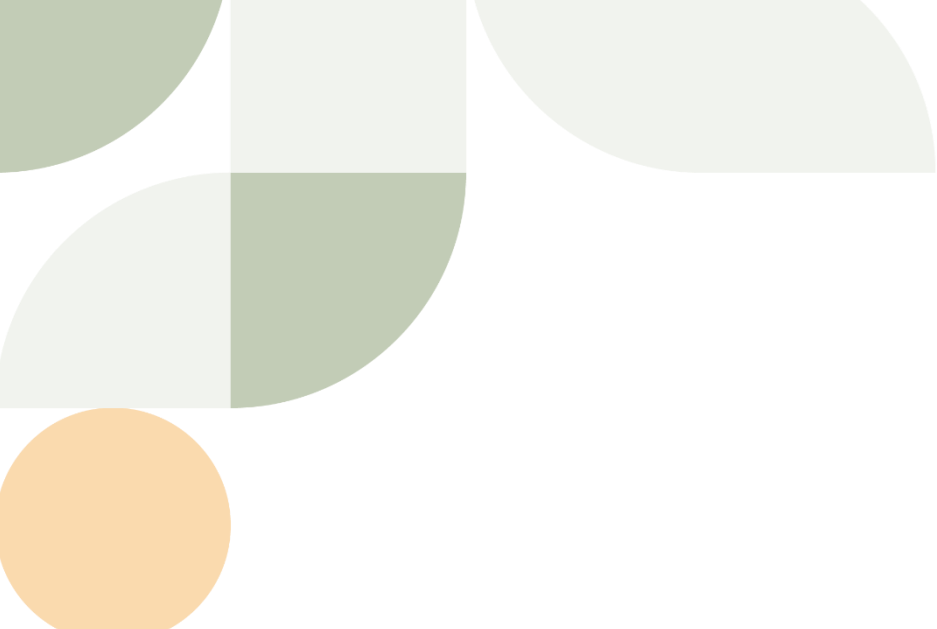




Lime Down

Solar Park

Farming and Food Security Technical Note

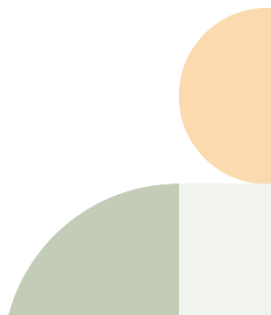
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1 Introduction

- 1.1.1 Lime Down Solar Park (LDSP) (the Scheme) comprises five Solar PV Sites, known as Lime Down A, B, C, D and E, and an associated Cable Route Corridor connecting the Solar PV Sites to the National Grid at Melksham Substation.
- 1.1.2 The Scheme is a Nationally Significant Infrastructure Project (NSIP) for which a Development Consent Order (DCO) is being sought. Throughout the DCO Examination process, the impact of the Scheme on food production and UK food security has been highlighted repeatedly as a factor requiring further consideration. This Technical Note has been prepared in response to the comments received.
- 1.1.3 This Farming and Food Security Technical Note is supplemental to **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]** and **Chapter 17: Soils and Agriculture [REP3-021]** and the **Planning Statement [REP3-081]**. It sets out the policy and guidance relating to land use, energy and food security; provides detail on Government subsidies in agriculture; puts UK food security in the context of other funding, land use decisions and other trade considerations; details the local context of the Scheme in relation to land use in Wiltshire; and provides commentary on the cumulative losses of agricultural land to solar developments.

2 Policy and Guidance

2.1 Policy

Overarching National Policy Statement for Energy (EN-1) (Ref 1)

- 2.1.1 The suite of National Policy Statements (NPS) sets out the Government's energy policy for the delivery of nationally significant energy infrastructure, the need for new energy infrastructure, and guidance for the determination of an application for a DCO. Although the NPS documents were re-issued in 2025, the 2023 versions of the NPS apply to the Scheme under the transitional provisions. Where there have been amendments or updates in the 2025 publications that are of importance and relevance, these are also referenced below.
- 2.1.2 EN-1 does not include any direct reference to food security considerations or farming circumstances when siting energy schemes. Paragraph 5.11.12 states that Applicants should seek to minimise impacts on Best and Most Versatile (BMV) quality agricultural land, that being land classified as Grades 1, 2 and 3a, and use poorer quality land, in Grades 3b, 4 and 5, in preference. Paragraph 5.11.34 notes that where schemes are to be sited on BMV quality agricultural land, which is considered to be the most productive, that the economic and other benefits of that land should be taken into account. Paragraph 5.11.34 repeats the advice to use poorer quality land in preference to that of higher quality.

National Policy Statement for Renewable Energy Infrastructure (EN-3) (Ref 2)

- 2.1.3 NPS EN-3 does not include any direct reference to food security considerations or farming circumstances when siting energy schemes.
- 2.1.4 Paragraphs 2.10.28 to 2.10.32 address agricultural land quality and land type in relation to factors influencing site selection. Specifically, paragraph 2.10.29 notes that land type should not be a predominating factor in determining site suitability and that where use of agricultural land is shown to be necessary that poorer quality land should be preferred over higher quality, avoiding use of BMV where possible. Paragraph 2.10.30 notes that the use of BMV land for ground mounted solar is not prohibited but that the impacts are expected to be considered. Paragraph 2.10.31 goes on to recognise that developments of this scale are likely to use agricultural land and that *"Applicants should explain their choice of site, noting the preference for brownfield, industrial and low and medium grade agricultural land."* Paragraph 2.10.32 suggests that *"consideration may be given as to whether the proposal allows for continued agricultural use"*

and/or can be co-located with other functions [...] to maximise the efficiency of land use.”

- 2.1.5 NPS EN-3 states in paragraph 2.10.145 that *“the Secretary of State should take into account the economic and other benefits of the best and most versatile agricultural land.”*
- 2.1.6 Section 2.7 of EN-3 addresses biomass and energy from waste (EfW). The policy notes that EfW developments are not critical to meeting clean power objectives but acknowledges that combustion of biomass plays an important role in meeting the UK’s energy needs and supporting delivery of net zero targets. Paragraph 2.7.5 details that biomass is obtained from three main categories, one being agricultural crops and residues which encompasses crops grown primarily for use in energy generation as well as residues such as straw and husks.
- 2.1.7 The updated NPS EN-3 published in 2025 (Ref 3) amends the category (at Paragraph 2.7.4) to refer to *“Biomass from sustainable crops, as well as conventional food crops.”* Although not directly related to solar developments, the inclusion in national energy policy of the use of agricultural land and crops including conventional food crops for a purpose other than food consumption is relevant as it recognises that energy production is a legitimate use of food-producing agricultural land.

National Policy Statement for Electricity Networks Infrastructure (EN-5) (Ref 3)

- 2.1.8 NPS EN-5 does not include any direct reference to food security considerations or farming circumstances when siting energy schemes. In regard to undergrounding cables, EN-5 notes under paragraph 2.9.25 that the Secretary of State should consider the Applicant’s commitment *“to mitigate potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land.”* The commitment must guarantee to return disturbed agricultural land to the baseline Agricultural Land Classification (ALC) to ensure no loss or degradation of agricultural land.

National Planning Policy

National Planning Policy Framework (Ref 5)

- 2.1.9 The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England. There are three overarching objectives: an economic objective, a social objective and an environmental objective.

- 2.1.10 The economic objective includes ensuring sufficient land of the right types is available in the right places and at the right time to support improved productivity. The environmental objective includes making effective use of land and moving to a low carbon economy.
- 2.1.11 Paragraph 88 notes that planning policies should enable the sustainable growth and expansion of all types of businesses in rural areas, as well as the development and diversification of agricultural and other land-based rural businesses.
- 2.1.12 Paragraphs 187 and 188 address the use of agricultural land for development, particularly in regard to BMV quality land, repeating the principles that the economic and other benefits should be considered, and that land of poorer quality should be used in preference to that of higher quality, allocating land with the least environmental or amenity value.
- 2.1.13 The current version of the NPPF does not make any direct reference to food security or food production. A previous iteration published in December 2023 (Ref 6) did, including at footnote 62, *“The availability of agricultural land used for food production should be considered, alongside other policies in this Framework, when deciding what sites are most appropriate for development.”*
- 2.1.14 The NPPF is due to be re-issued in Summer 2026 and has been published in draft (Ref 7). Draft Policy E2 notes that, to support business growth, substantial weight should be given to *“benefits for domestic food production, animal welfare and the environment which can be demonstrated through proposals for development for farm and agricultural modernisation.”*
- 2.1.15 Draft Policy E4 expands on paragraph 88 of the current NPPF, and notes that the sustainable growth of businesses in rural areas should be supported, including *“Development to maintain and enhance farm viability and sustainability and support domestic food production.”*

Written Ministerial Statement (WMS)

- 2.1.16 The WMS on “Solar and protecting our Food Security and Best and Most Versatile (BMV) Land” dated May 2024 (Ref 8) re-emphasised the planning policy in place at that time, including the need to consider the availability of agricultural land for food production, but has not been updated to reflect current planning policy. The Applicant considers that the WMS should be read in the context of the NPPF and the 2025 Energy NPSs which do not contain policy regarding food production.

- 2.1.17 The WMS notes that *“even in the most ambitious scenarios [solar] would still occupy less than 1% of the UK’s agricultural land.”*
- 2.1.18 The current Secretary of State for Energy Security and Net Zero’s statement to Parliament on 18 July 2024 called “Clean Energy Superpower Mission” (Ref 9) stated:
- 2.1.19 *“Credible external estimates suggest that ground mounted solar used just 0.1% of our land in 2022. 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 farms.”*

Wiltshire Planning Policy

- 2.1.20 The Wiltshire Local Plan Review was withdrawn from examination in May 2026. Current policy is therefore represented in the adopted Wiltshire Core Strategy of 2015 (Ref 10).
- 2.1.21 Core Policy 34 indicates that developments will be supported that *“support sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification.”*
- 2.1.22 Core Policy 42 addresses standalone renewable energy installations and repeats national policy that proposals will need to assess and take into account BMV agricultural land.
- 2.1.23 The withdrawn Local Plan draft (Ref 11) contains at Policy 4 that development proposals must support a move to carbon neutrality and adaptation to climate change, including *“protecting high grade agricultural land for future use to help support food security.”*

2.2 Guidance and Other Publications

- 2.2.1 There is a range of guidance documents and information papers applicable to land use decisions, agricultural land and soils in planning, food security and energy. The following are considered to be key documents relevant to the Scheme but are not an exhaustive list.

Land Use

The Land Use Framework (Ref 12)

- 2.2.2 The Land Use Framework sets out a blueprint for using land in England more effectively in order to better balance food security, energy security, housing needs and nature restoration. It confirms that *“we have enough land to deliver all of our objectives, provided we use it in a more efficient and multifunctional way.”*

- 2.2.3 The Land Use Framework indicates that the composition of land use in England includes 70% agricultural (arable, horticulture, improved grassland and semi-natural grassland); 11% urban; and currently less than 1% of land currently occupied by solar energy.
- 2.2.4 In relation to renewable energy infrastructure, the Land Use Framework estimates that the amount of land in England required to meet renewable energy objectives in 2050 would be around 1% of England's total land and around 2% of the Utilised Agricultural Area. The Framework accepts that there is inherent uncertainty in forecasting the electricity mix to 2050 and that this land use figure for renewables could be over 2%, but it still represents a very small proportion of the total Utilised Agricultural Area.
- 2.2.5 The Framework includes the vision that by 2030, farmers and land managers will have clarity on long-term opportunities for their land and policy on food production. Importantly, it notes that *"Many farm businesses will be stacking multiple income streams on top of food production, supporting investment in the core business of food growing while benefiting from income diversification."*
- 2.2.6 The vision for 2050 is that agricultural land will be managed to prioritise sustainable food production and environmental benefits, balancing food production with other outcomes according to the relative strengths of the land. The aim includes producing more of what we consume through reducing the use of produce for processed food or animal feed. Footnote 4 states that in 2023, 85% of the UK's Utilised Agricultural Area was used for animal feed or animal production.
- 2.2.7 The Framework acknowledges that food needs to be produced more sustainably from less land in order to maintain domestic food system resilience but it also stresses that *"a thriving natural environment and resilience to a changing climate are the foundations of our economy and essential for food security and profitable farm businesses."*
- 2.2.8 The Government position is therefore not that land use is an either/or decision, but that land use considered in a national context can support food security, energy security, social and environmental objectives. The Framework highlights the complexity of the interrelationships between all of these pressures but does largely put farmers at the forefront.

Agricultural Land Classification

- 2.2.9 The ALC system provides the means of grading agricultural land according to long-term limitations to its agricultural use. The ALC guidelines (Ref 13) set out the framework for classifying land into one of five grades (with Grade 3 subdivided into 3a and 3b). Grades 1, 2 and 3a represent the BMV agricultural land referred to in planning policy and in the NPSs.

- 2.2.10 As noted within the guidelines, *“the grading does not necessarily reflect the current economic value of land, land use, range of crops, suitability for specific crops, or level of yield.”* The ALC system is therefore a qualitative scale by which to compare two or more pieces of land; it does not quantify present-day production capability.
- 2.2.11 It is also important to consider that the agro-climatic dataset used when assessing the grade of land was published in 1989 (Ref 14) and draws upon the datasets available at the time. The rainfall measurements are taken from 1941- 1970, the temperature measurements from 1961-1980, and estimates of field capacity are also from 1941-1970.
- 2.2.12 The ALC system is under review and is expected to be updated by 2028 to incorporate more applicable climate data. At such a time, every ALC survey undertaken to date will likely require review in order to be re-validated.
- 2.2.13 The ALC guidelines also do not account for technological advances made since the original publication in 1988, in either agricultural machinery, or in the development of crop varieties.
- 2.2.14 The ALC is therefore a useful and important tool in evaluating the impacts of development schemes on agricultural land, however it is not immutable.

Food Security

UK Food Security Report (Ref 15)

- 2.2.15 The UK Food Security Report opens by highlighting global factors that affect the UK’s food security, including global conflict, global pandemic, extreme weather conditions and climate change, labour shortages, inflation, biodiversity loss and water insecurity.
- 2.2.16 On the theme of UK production only, the report confirms that *“food production is reliant on the natural environment, good quality soil and water, and available pollinators.”* The overall ratio of domestic food production to trade is around 60:40, increasing to 75:25 for indigenous foods (i.e. the UK is 75% self-sufficient in home-grown produce). Much of the imported food produce is a reflection of consumer demand and preference rather than absolute deficiency, comprising fruits, out of season vegetables, seafood and rice.
- 2.2.17 On land use, the report states that the major use of agricultural land continues to be for animal feed, which aligns with the Land Use Framework that notes 85% of UK agricultural land is used for animals or animal feed.

- 2.2.18 The UK Food Security Report demonstrates that domestic food security is not isolated from global influences, and that food security goes far beyond national land use planning.

Roadmap for Resilience: A UK Food Plan for 2050 (Ref 16)

- 2.2.19 The Roadmap for Resilience summarises a holistic approach to the UK food system, exploring plausible pathways for change. It sets out ten priority actions to drive food system transformation, such as reform of agricultural policies, targets for dietary change, measures to protect food security including scrutinising trade deals so as not to compromise UK production capacity, and developing integrated food and land strategies.
- 2.2.20 The Roadmap acknowledges that current land use patterns poorly serve competing pressures, noting that the least productive 20% of farmland in England produces only 3% of our calories. It goes on to suggest that using the least productive 10% of land for natural habitat and carbon removal would deliver half of the carbon savings needed to achieve greenhouse gas emissions targets by 2035.
- 2.2.21 The Roadmap refers to Defra's Land Use Consultation, stating that 430,000 hectares (5% of England's agricultural land) would be farmed principally for environmental purposes, and another 760,000 hectares (9% of England's agricultural land) would leave agricultural production entirely for woodland creation, peat habitat and heathland restoration. Defra noted that this level of land use change is achievable alongside maintaining or moderately improving food production.
- 2.2.22 The Government is therefore confident that taking almost 1.2 million hectares of agricultural land out of production in favour of environmental schemes will not compromise food security, provided a holistic approach to land use is adopted.

Farming Roadmap 2050 (Ref 17)

- 2.2.23 Published by Defra on the 24th June 2026, the Farming Roadmap sets out a long-term plan for farming as well as practical steps to be taken over the next five years.
- 2.2.24 In engagement with the farming sector, the concern that "*food production could be sidelined, particularly if environmental objectives are considered a separate or competing priority,*" was highlighted, as well as concerns about market fairness, workforce pressures, and access to advice, funding and innovation being uneven. This latter concern is further commented on in Section 3.2 of this report.

- 2.2.25 The Roadmap confirms that “*domestic food production can be maintained whilst also achieving environmental ambition,*” and that “*the long-term future of farming depends on a healthy environment,*” but also acknowledges that innovation in technology and skills is essential to maintaining food outputs.

Solar, Agricultural Land and Soils

Natural Capital Best Practice Guidance (Ref 18)

- 2.2.26 Solar Energy UK note in their natural capital best practice guidance that within solar developments, less than 2% of the land is typically disturbed by infrastructure. Around the majority of the solar farm area, the environmental benefits associated with the establishment of grassland and wildflower meadow beneath and around solar panels include improvements to soil health, the reduction to minimal or no use of pesticides, herbicides and fertilisers, and increases in pollinator populations. The UK Food Security Report (Ref 15) confirms that food security is reliant on soil health and pollinators.
- 2.2.27 The Natural Capital Best Practice Guidance also acknowledges that solar farms represent an important revenue stream for farmers, enabling the business to diversify and find a use for their least productive or under-utilised land, as well as being able to use the income to develop other parts of the farming business. This is similarly highlighted in the Land Use Framework (Ref 12).

3 Key Domestic Factors

3.1 Agri-Environment Schemes

- 3.1.1 When the UK left the EU in 2020, it also left the Common Agricultural Policy (CAP), enabling the UK Government to establish its own framework for subsidising UK farming. In response, Defra developed a new environmental policy called Environmental Land Management (ELM). The Sustainable Farming Incentive (SFI), Countryside Stewardship and Higher-Level Stewardship all come under ELM policy.
- 3.1.2 In July 2021, the then-Secretary of State for Environment, Food and Rural Affairs noted that in order to hit environmental targets under the Environment Bill, Defra was aiming for over 70% of farmers to be fully engaged with ELM. In addition to ELM, local nature recovery and landscape recovery schemes are also separately in place (Ref 19).
- 3.1.3 The SFI was piloted in 2021 and relaunched in 2026, with the Government re-opening the first window of applications on the 30th June 2026. The first window is expected to be open for two months, and a second window will open in September 2026, currently with no fixed end date. The SFI pays farmers and land managers to implement sustainable farming practices that:
- Protect and benefit the environment;
 - Support food production; and
 - Improve productivity.
- 3.1.4 The funded actions available for arable land include legume fallow, flower-rich grass margins, blocks or in-field strips, cultivated areas for arable plants, winter bird food and arable reversion to grassland (Ref 20). The SFI agreements typically last for three years. Land entering applicable SFI schemes to the end of 2026 and potentially into 2027, will be unavailable for food production until the end of 2029 at the earliest.
- 3.1.5 Since 2021, Government subsidies for farmers have therefore targeted improvements to farm resilience through environmental outcomes over more direct approaches to boosting food production. As of December 2025, an estimated 6.1 million hectares of agricultural land in England was under an agri-environment scheme agreement, representing 69% of the utilised agricultural area (of 8.8 million hectares) (Ref 21).
- 3.1.6 In a press release issued on the 11th June 2026, Defra stated that “*these schemes will help boost food production, strengthen farm resilience, support nature recovery, and underpin the UK’s long-term food security.*”

3.2 Other Government Funding

- 3.2.1 While the SFI scheme in 2026 has a budget of £240 million, the Farming Equipment and Technology Fund (applications to which closed in May 2026) had a total budget of £50 million. The scheme was open to farmers, growers, foresters and their contractors and was made up of £20 million for equipment purchase and upgrades, £20 million to improve animal health and welfare, and £10 million for slurry management (Ref 22).
- 3.2.2 Government funding to improve efficiency and productivity on farms has, to date, represented only 20% of the budget for just one of the three ELM pillars. This further highlights the emphasis the Government has placed on using environmental enhancements to increase domestic food security.
- 3.2.3 On the 24th June 2026, the Government announced a further investment of £53 million for the Farming Innovation Programme, in addition to the £50 million detailed above. The Farming Innovation Programme is run in partnership between Defra and Innovate UK, and focuses on research, innovation and trials. The fund is not so easily accessible to farmers, as *“this funding is being run as a competition, which means that all the applications will be judged and only the successful ones will be funded,”* and in order to be eligible, the farmer must work in partnership with a business or research organisation (Ref 23). How well that funding will feed down from Government to enable farmers to improve productivity on individual holdings is not clear.

3.3 Land Use Decisions

- 3.3.1 The various actions under the SFI attract differing levels of payment per hectare and are capped at £100,000 per farm or farm business. The SFI can therefore provide a substantial income to a farm for implementing actions likely to occupy the land within the holding with some of the greatest practical challenges to farm, enabling the farmer to focus funds and efforts elsewhere on the holding.
- 3.3.2 The siting of a solar farm on a holding offers landowners the opportunity to expand or upgrade other aspects of their farming business using the funds made available from leasing the land.
- 3.3.3 Referring back to the Land Use Framework (Ref 12), which noted that *“many farm businesses will be stacking multiple income streams on top of food production, supporting investment in the core business of food growing while benefiting from income diversification,”* the length of the agreements with solar developers for their use of the land provides long-term financial security to a holding, in turn enabling longer-term decisions and investments to be made.

3.4 Self-Sufficiency Context

- 3.4.1 According to the UK Food Security Report (Ref 15) the UK's self-sufficiency ratio is around 60% across all food and drink, or 75% for indigenous produce.
- 3.4.2 While the UK imports a substantial amount of produce, the value of UK food and drink exports was £24.6 billion in 2024. The Government has stated an aim to increase the value of exports to £35 billion in 2035 (Ref 24).
- 3.4.3 The Government has secured an additional £80 million in new export opportunities so far in 2026, including genetics exports to the USA, cheese exports to Brazil, and poultry and eggs to the UAE, in addition to deals in 2025 to export beef to the USA, pork to Mexico and dairy products to Egypt (Ref 24). The focus on increasing the export of domestically produced food suggests that the Government does not consider that there is a food security reason to retain such domestically produced food for UK consumers.

3.5 Food Security in the National Context - Summary

- 3.5.1 It is clear from national planning policy on energy infrastructure and overall development, from papers on food security and best practice, and from focus within farming subsidies and trade deals, that the UK Government does not consider that environmental and economic targets represent a threat to UK food security.
- 3.5.2 At a national level, domestic food security is further influenced by a multitude of other factors, including but not limited to consumer choice, diet, food marketing, supermarket pricing, farm succession and food waste.
- 3.5.3 Promoting integrated land use, including enhancing the environment, preserving the highest quality agricultural land and making provision for cleaner energy production, is considered to strengthen the UK's resilience to the global influences that represent the biggest threats to food security.

4 LDSP, Food Security and Land Holdings

4.1.1 The land within the Solar PV Sites is distributed between eight landowners. The Applicant has engaged with these landowners throughout the development of the Scheme. Further information on the effects of implementing the Scheme on the affected farm holdings has been sought through issue of a questionnaire to establish if and how the running of the holdings will change. Responses for five of the land holdings have thus far provided details on the anticipated effects on their land and their responses are summarised below.

4.1.2 All responses received detail uptake of the SFI scheme within the respective holding. Some responses detail how the least productive land within the holding has been turned over to SFI, providing a financial as well as ecological benefit from the most challenging land to farm. The responses indicate how farm holdings are able to adapt to incorporate non-agricultural land uses within their management systems whilst maintaining a viable and resilient farming business with little to no impact on food production, even in light of the external influences described in Section 3.

Landowner 1

4.1.3 The holding farms approximately 280 hectares in the immediate vicinity of the main farmstead, and therefore of the Scheme.

4.1.4 The land is managed under a cereal rotation of wheat and barley with SFI actions. Other land within the holding is also subject to ELM agreements.

4.1.5 The siting of the Scheme on the holding will not result in any changes to the management of the farm, which includes other arable land as well as permanent grazing.

4.1.6 As farming operations are anticipated to be unaffected by the Scheme, there will be no associated loss of food production or impact on food security.

Landowner 2

4.1.7 The holding farms approximately 260 hectares in total, utilising two farmsteads within an 8-mile radius.

4.1.8 The typical crop rotation is wheat with barley or maize and occasional grass ley, with break crops over winter stubble. The holding has a herd of cattle which they finish on the holding. Finishing cattle requires a high-energy diet that will include barley and maize from the crop rotation.

4.1.9 Approximately 120 hectares, or 47% of the holding, is currently managed under ELM agreements, which are coming to an end. The holding has

already adapted to actively farming only half of the available farmable area; the siting of the Scheme on the land will require a rotation in the land utilised but otherwise the farming operations would continue largely as usual.

4.1.10 The land within the Scheme is noted to be on Cotswold brash and to consistently be the lowest-yielding land within the holding.

4.1.11 The siting of solar panels on this holding would therefore have no impact on food security as the farmable area and rotation would remain largely the same with or without the Scheme. The Scheme will, however, occupy the least productive land available to the holding resulting in financial (in the form of rental income), environmental and energy benefits without leading to a reduction in overall output.

Landowner 3

4.1.12 The holding farms approximately 114 hectares in total. The main farmstead is within around 1 km of the Scheme.

4.1.13 The crop rotation for 2026 comprises around 37 hectares of wheat and 34 hectares of maize, and the remainder of around 41 hectares or 36% of the farmable area, is under SFI. The SFI actions are 3-year actions which started in May 2025 and will therefore run until May 2028. There may be some overlap between construction of the Scheme commencing on this holding and the end of the SFI agreements, however, should the landowner retain management control of the land in the applicable area of the Solar PV Site until the end of the agreement, there will be no implications for the SFI agreement.

4.1.14 The land within the Scheme is described as heavy clay which is difficult to cultivate due to either being too wet or too dry across the year. With the Scheme in place, the farming operations would continue as usual, with the same rotations, across the remaining land. The holding has already adapted to using only 43% of their farmable area.

4.1.15 There will be no impact of the Scheme on food production arising on this holding.

Landowner 4

4.1.16 The holding extends to approximately 290 hectares in total, of which around 132 hectares is owner-occupied, around 128 hectares is tenanted and 29 hectares is woodland. The main farmstead is located approximately 1 km north of the land affected by the Scheme, which will utilise around 77 hectares, or 58%, of the owner-occupied land.

- 4.1.17 Around 23 hectares is in a cereal rotation of wheat and oats with a break crop of maize every fourth year and 7 hectares is under pasture. The other 46 hectares of the owner-occupied arable land is under Countryside Stewardship in a low input cereal rotation. Under normal management, only 40% of the owner-occupied land is used for commercial crop/food production which is sold to third parties. The Scheme would not result in changes to the future management of the rest of the owner-occupied land. The landowner notes that most of the land within the Scheme is heavy and has been susceptible to changing weather patterns over the last ten years or so. Crop yields have been adversely affected by longer periods of both wet and dry weather at unusual times. The Scheme will therefore utilise land that is shown to be more vulnerable to external influences.
- 4.1.18 There will be no adverse impact of the Scheme on food production on the owner-occupied land in this holding.
- 4.1.19 The tenanted land is understood to extend to approximately 33 hectares and to be part of a mixed arable and cattle enterprise extending to around 73 hectares in total [REP3-158]. The fields within the Scheme provide cereals for animal feed and straw for bedding [RR-0252]. It is understood that the remainder of the land within the holding is under permanent pasture or is in an ELM scheme [REP3-158]. Although the land is the highest quality land available across the Solar PV Sites, its use is comparable to the remainder. The use of the land for the Scheme will affect the provision of feed for the cattle on the holding, which is likely to need to be supplemented from external sources for the herd to be maintained. Loss of the farmable area would have no impact on food production for direct human consumption.

Landowner 5

- 4.1.20 Approximately 89 hectares of tenanted land would be occupied by the Scheme. The land is under an arable rotation with grass ley and included land under stubble in spring due to the ELM schemes that are currently active. The land within the Scheme also includes diversification in the form of growing sunflowers.
- 4.1.21 **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP3-067]** similarly identified both the brashy limestone soil type and the heavy clay soil type within the holding.

Other Holdings

- 4.1.22 Questionnaire responses have not yet been received for three holdings but some information is known from the agricultural land and soil resources surveys undertaken in **ES Volume 3, Appendix 17-1:**

**Agricultural Land Classification and Soil Resource Survey Report
[REP3-067].**

Landowner 6

- 4.1.23 Approximately 82 hectares of owner-occupied agricultural land belonging to this holding will be utilised by the Scheme. The land is arable and is known to also incorporate winter cover and game cover which indicates an ELM scheme may be active.
- 4.1.24 The soil survey undertaken in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP3-067]** identified both the brashy limestone soil type and the heavy clay soil type within the holding. There are known to be challenges and limitations to farming both soil types.

Landowner 7

- 4.1.25 Approximately 47 hectares of owner-occupied agricultural land belonging to this holding will be utilised by the Scheme. The land is arable with a rotation including cereals, oilseed rape and grass ley. Mixed cropping within the same field indicates an ELM scheme may be active.
- 4.1.26 The soil survey undertaken in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP3-067]** similarly identified both the brashy limestone soil type and the heavy clay soil type within the holding.

Landowner 8

- 4.1.27 Approximately 50 hectares of agricultural land of this holding is included in the Scheme. The land is in an arable rotation.
- 4.1.28 The soil survey undertaken [REP3-067] similarly identified both the brashy limestone soil type and the heavy clay soil type within the holding.
- 4.1.29 Across the three holdings for which questionnaire responses were not received, it is known that most of the land is under arable cereal rotations and covers the same soil types as those holdings from which responses were received. The holdings are likely to be facing the same challenges with utilising brashy and/or heavy soils that the respondents describe.
- 4.1.30 Of the responses received, typically more than one-third of the total holding is under SFI or Countryside Stewardship agreements. Of the four holdings from which responses were not received, there is ground evidence that ELM schemes may be active. It is assumed that these remaining holdings will also have ELM schemes incorporated into their

usual management and that the businesses are already adapted to using only a proportion of the available farmable area in any given year.

- 4.1.31 Similar to the analysis of the holdings for which questionnaire responses were received, it is considered unlikely that the presence of the Scheme across all Solar PV Sites will have any impact on food production.

5 LDSP and Local Context

5.1 Farmland in Wiltshire

- 5.1.1 Estimates of total land area and farmed land area within Wiltshire Council differ between sources. In their response to the Examining Authority's (ExA) First Written Questions [REP3-142], Wiltshire Council states that Wiltshire County extends to a total of 348,500 hectares, within which 273,555 hectares (75%) is farmed. The source of these measurements is not known.
- 5.1.2 Wiltshire Council commissioned a Wiltshire Landscape Character Assessment (WLCA) in 2005 (Ref 25).
- 5.1.3 The WLCA noted that the greatest influences on land use at the time of the study (2005) were the CAP and the market prices of agricultural commodities. It predicted that "*Land that is marginal to productive agriculture, such as on thin, stony or heavy soils, is likely to be managed less intensively or, in some cases, will be abandoned for agricultural purposes altogether.*"
- 5.1.4 The five Solar PV Sites within the Scheme are situated across both of these soil types which give rise to marginal quality land, being mostly Subgrade 3b and Grade 4. Although it is not known what would have happened to the land had the CAP or other agricultural subsidy continued in that previous form, i.e. with payments tied to land area rather than land management, Wiltshire Council's study suggests that there was the potential for food production and other agricultural output to have ceased in some of these areas without the development of ELM.

Agricultural Land Quality

- 5.1.5 All of the agricultural land in England and Wales was mapped from reconnaissance field surveys at a scale of 1:63,360, or one inch to one mile, between 1967 and 1974. These Provisional ALC maps were intended to provide strategic guidance on agricultural land quality. The strategic maps were later digitised and published on a scale of 1:250,000.
- 5.1.6 In April 2026, Defra refined the Provisional ALC mapping and produced the Predictive ALC Map for England. The mapping is similarly suited for guidance and strategic use only but includes the subdivision of Grade 3 into the subgrades 3a and 3b in determining the likely land quality.
- 5.1.7 The areas within the administrative boundary of Wiltshire of each ALC grade derived from each of the maps, in addition to areas of non-agricultural land such as woodland, and urban land, are given in Table 1.

Table 1 Wiltshire Land Use Areas

Description		Provisional ALC (1967-1974)			Predictive ALC (2026)		
		Area (ha)	Area (% of all land)	Area (% of agricultural land)	Area (ha)	Area (% of all land)	Area (% of agricultural land)
Grade 1		6,389	2.0	2.3	15,295	4.7	5.3
Grade 2		46,513	14.3	16.7	39,995	12.3	13.8
Grade 3	Subgrade 3a	191,799	58.9	68.8	121,100	37.2	41.9
	Subgrade 3b				83,081	25.5	28.7
Total BMV		148,801*	45.5	53.4	176,390	54.2	61.0
Grade 4		30,387	9.3	10.9	27,634	8.5	9.6
Grade 5		3,841	1.2	1.4	1,903	0.6	0.7
Total agricultural		278,929	85.7	100	289,009	88.8	100
Non-agricultural		41,219	12.7	0.0	18,731	5.8	0.0
Urban		5,384	1.7	0.0	17,795	5.5	0.0
Total		325,532	100	0.0	325,536	100	0.0

**Assuming an equal split of Subgrade 3a and Subgrade 3b*

- 5.1.8 The Predictive mapping has resulted in an overall upgrade of likely land quality. The Predictive ALC mapping indicates that 54.2% of all land in Wiltshire, or 61.0% of agricultural land, is BMV quality in Grades 1, 2 and 3a.
- 5.1.9 The ALC grades across Lime Down's Solar PV Sites as determined through the ALC surveys undertaken are given in Table 2 alongside the county statistics for direct comparison, as well as a statement of the proportion of land of each grade required for the Scheme.

Table 2 Solar PV Site ALC areas

Description	Area (ha)	Area (% agricultural land)	Wiltshire Grade Area (%)	LDSP as a Proportion of the Same Grade Across Wiltshire (%)
Grade 1	0.0	0.0	5.3	0.0
Grade 2	30.8	4.2	13.8	<0.1
Subgrade 3a	202.5	27.4	41.9	0.2
Total BMV	233.3	31.6	61.0	0.1*
Subgrade 3b	245.6	33.3	28.7	0.3
Grade 4	204.2	27.6	9.6	0.7
Grade 5	0.0	0.0	0.7	0.0
Agri mitigation	55.5	7.5	-	-
Total agricultural	738.6	100	100	-0.3
*The percentages of each ALC grade are not accumulative because the gross land areas of each grade being compared are different. The statistic for Total BMV also accounts for there being Grade 1 in Wiltshire but not in the Scheme.				

- 5.1.10 Compared with the proportion of BMV land across Wiltshire as a whole, the Scheme utilises a much lower proportion of BMV land, at 31.6% compared with the county's 61.0%. In terms of Wiltshire's total agricultural land resource, the Scheme would utilise approximately 0.1% of the available BMV quality land, in comparison to a much larger proportion of 0.7% of the county's poor-quality Grade 4 land resource. This illustrates how the Scheme has sought to utilise lower quality land in preference of higher quality land in accordance with NPS and the objective of the Land Use Framework (Ref 12) of balancing food production with other outcomes according to the relative strengths of the land.

5.2 Solar in Wiltshire

- 5.2.1 Commentary received from Wiltshire Council in response to the Examining Authority's First Written Questions in the application examination process [REP3-142] indicates that Wiltshire has over 1,200 hectares of operational or approved solar farms. Wiltshire Council is noted to have assessed 61 sites covering 1,278 hectares, of which 39.5 hectares are within commercial sites and so did not affect agricultural land, and 119 hectares are on Grade 4 quality land. Wiltshire Council states that none of Wiltshire's Grade 2 quality agricultural land is yet being used for solar energy, leaving 1,119.5 hectares on Provisional Grade 3.

- 5.2.2 Detailed survey data was found for 442 hectares, of which 399 hectares (90%) is Subgrade 3b and 43 hectares (10%) is Subgrade 3a.
- 5.2.3 Wiltshire Council has not provided the list of schemes assessed and therefore the areas and provisional/predictive and detailed ALC cannot be verified.
- 5.2.4 The Renewable Energy Planning Database (Ref 26) tracks the progress of UK solar projects through the planning system and publishes quarterly updates of progress. The dataset can filter out projects by development status. In April 2026, ground mounted solar either operational, under construction or with permission granted in Wiltshire, covers 2,017 ha (across all land types) within 78 schemes.
- 5.2.5 A search of Wiltshire Council's planning portal identified 41 ground solar schemes, of which:
- 32 are approved;
- 5.2.6 Five are under consultation;
- Two were refused but are being appealed; and
 - Two were refused and are not (yet) being appealed.
- 5.2.7 Of the 32 approved schemes identified:
- 17 have detailed ALC survey data;
 - 15 are provisionally mapped as Grade 3 or Grade 4.
- 5.2.8 The collective ALC areas of schemes with survey data available are:
- Grade 2 – 9.6 hectares
 - Subgrade 3a – 28.3 hectares
 - Subgrade 3b – 614.7 hectares
 - Grade 4 – 205.9 hectares.
- 5.2.9 The list of schemes assessed is included at Annex A. The schemes total 858.5 hectares. The proportion of confirmed BMV land is 4% across 17 schemes.
- 5.2.10 However, the scheme areas range from 10.2 hectares to 108.4 hectares, with an average size of 40 hectares. Smaller schemes have much greater flexibility on siting and therefore the opportunity to avoid the use of BMV agricultural land.

- 5.2.11 Adding Lime Down Solar Park to this list of schemes brings the total solar PV area to 1,541 hectares. The cumulative gradings and proportions are set out in Table 3, alongside statistics for Wiltshire for comparison.

Table 3 Cumulative ALC areas

Description	Cumulative Confirmed Solar ALC Area (ha)	Cumulative Confirmed Solar ALC Area (%)	Proportions of Agricultural Land in Wiltshire (%)	Cumulative Solar as a Proportion of Wiltshire (%)
Grade 1	0.0	0.0	5.3	0.0
Grade 2	40.4	2.6	13.8	0.1
Subgrade 3a	230.8	15.0	41.9	0.2
Total BMV	271.2	17.6	61.0	0.2
Subgrade 3b	860.3	55.8	28.7	1.0
Grade 4	410.1	26.6	9.6	1.5
Grade 5	0.0	0.0	0.7	0.0

- 5.2.12 Cumulatively, all of the confirmed ALC gradings together indicate 17.6% of land occupied by solar is BMV quality which represents 0.2% of Wiltshire's BMV land resource.
- 5.2.13 In the overall context of land use in Wiltshire, Lime Down Solar Park, although covering a substantial area, would remove only 233.3 ha (0.1%) of BMV land from primary agricultural production on a long term but temporary basis.
- 5.2.14 The Applicant therefore considers that the Scheme will have a negligible effect in terms of local and national food security when taken in consideration among other factors across all spatial, social and political scales.

6 Assessing Cumulative Effects of Solar Farms on Agricultural Land

6.1 Cumulative Effects Guidance

- 6.1.1 There is no agreed methodology for assessing cumulative effects of development proposals on agricultural land and soils, and by association, food production (Ref 27).
- 6.1.2 Guidance issued by the Planning Inspectorate (PINS) (Ref 28) in relation to cumulative assessments specifically for NSIPs advises a four-stage process to a Cumulative Effects Assessment (CEA), comprising establishment of a long-list, then a short-list, followed by information gathering and finally assessment. Food security is unlike other discipline areas, whereby there is not a simple correlation between development and effect.
- 6.1.3 The PINS guidance recommends that the long-list is based upon other existing or proposed development within a relevant Zone of Influence (ZOI), and that this is not limited to developments of the same type as the proposal. In assessing impacts on national food security, the ZOI would need to extend to the whole of England or the UK.
- 6.1.4 At the short-list stage, the PINS guidance notes that threshold criteria should be applied to the long-list to ensure the assessment is proportionate. The difficulty is then finding the balance between assessing the impact on national food security, without having to assess against every proposal nationwide.
- 6.1.5 Guidance from the Institute of Sustainability and Environmental Professionals (ISEP) (Ref 29) suggests that in undertaking a CEA for agricultural land and soils, historical effects should also be considered, further expanding the spatial ZOI to also incorporate a temporal ZOI.
- 6.1.6 The ISEP guidance goes on to suggest that for permanent effects on agricultural land and soils, *"the degree of significance should be determined with reference to the contribution of individual development projects to changing rates of land losses at the national level or a rolling five-year basis."*
- 6.1.7 Other guidance published by ISEP/IEMA (Ref 30) expands on the proposed methodology, noting that the CEA should calculate the proportionate contribution of the proposals toward annual land loss, allowing for the contribution to split over several years for phased developments. For undeveloped land, it suggests a contribution of more than 1% of the five-year average land loss could be potentially significant

at a national scale, whilst acknowledging that a database of annual losses from which the five-year average would be determined does not exist.

6.2 Approach to the CEA

- 6.2.1 The difficulty with assessing cumulative losses of farmable area to solar farms, particularly that of marginal agricultural land quality, is that most of the land remains in-situ and is not actually lost to development but remains functional in terms of ecosystem services and potential cross-boundary benefits to other agricultural land (for example through sustaining larger pollinator populations), notwithstanding the possibility of continued agricultural production through sheep grazing.
- 6.2.2 This is further complicated by there being no obligation for a farmer to actively farm the land or to use land of particular grades for particular purposes. For example, there cannot be a standardised methodology for assigning a value to under-utilised Grade 1 quality land (in terms of production potential) in comparison with fully utilised Subgrade 3b quality land, in light of planning policy that protects one and not the other.
- 6.2.3 The CEA for the Scheme considered other proposals identified in **ES Volume 3, Appendix 21-2: Long List of In Combination Effects and Cumulative Developments [APP-264]** which utilised the PINS approach of setting a spatial ZOI (of 10km) to capture effects at a local scale as opposed to regional or national. The other schemes assessed include solar developments and battery energy storage as well as residential developments and encompass both long-term temporary and permanent losses of agricultural land at a local scale.
- 6.2.4 The CEA for the Scheme has adopted the most logical approach available for assessing cumulative effects on agricultural land.
- 6.2.5 The Predictive ALC map for England indicates that Wiltshire has 289,009 ha of agricultural land. The 738.6 ha in the Solar PV Sites required for the Scheme represents 0.26% of Wiltshire's agricultural land resource.
- 6.2.6 The Land Use Framework estimates that the amount of land in England required to meet renewable energy objectives in 2050 would be around 1% of England's total land. The ISEP guidance similarly refers to 1% being a threshold for significance in assessing cumulative losses.
- 6.2.7 Using 1% as a benchmark, the Scheme does not represent a significant loss of agricultural land use in the county.

7 Conclusion

- 7.1.1 This Technical Note has established that it is clear from national policy, technical papers and Government backed schemes, that farmers and the environment are the drivers of food security. Deployment of the Scheme on marginal, moderate to low grade agricultural land compliments multiple sustainability objectives, including those related to environment, energy, and farm diversification and sustainability.
- 7.1.2 Information on the impacts of the Scheme on the affected farming systems for the effect land holdings has demonstrated through correspondence with the landowners that there will be little to no change to the farming operations, and therefore to local food production resulting from the Scheme.
- 7.1.3 There is no established methodology for assessing the potential effects of the Scheme on food production and food security. Although the Scheme occupies a substantial area, this Technical Note has demonstrated that, in the context of Wiltshire, the proportion of BMV quality agricultural land used is far smaller than the overall proportion across the county, at 31.6% compared with 61.0% BMV land. Only 0.1% of Wiltshire's BMV land resource will be affected by the Scheme, in comparison to 0.7% of the poorer quality land resource in Grade 4.
- 7.1.4 In relation to the requirements of the NPSs, the NPPF and the Wiltshire Core Strategy, the Scheme is demonstrated to use lower quality land in preference to that of higher quality, minimising potential impacts on food production and food security.
- 7.1.5 The area occupied by the Scheme amounting to 0.26% of the agricultural land in Wiltshire shows that the loss of the agricultural land use is not significant at a county scale.
- 7.1.6 The Applicant considers that the Scheme will therefore have a negligible effect in terms of local and national food security when taken in consideration among other factors across all spatial, social and political scales.

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Annex A List of Solar Schemes Assessed

Name	Application Ref	Location	Area (ha)	ALC (Grade – ha)	Status
Red Barn	PL/2023/08481	Kingston St Michael	108.4	3b – 21.1 4 – 87.3	Approved
Five Lanes	20/08618/FUL	Malmesbury	63.1	3a – 6.2 3b – 36.9 4 – 18.7	Approved
Wick Solar Farm	20/06840/FUL	Melksham	84.0	3b	Approved
Studley Solar Farm	PL/2021/08690	Melksham	31.0	3b	Approved
Leigh Delamere Solar Farm	PL/2021/06100	Leigh Delamere	87.9	3b	Approved
Forest Gate	PL/2021/06112	Chippenham	91.0	2 – 4.0 3b – 87.0	Approved
StorrIDGE Road	PL/2021/10592	Westbury	38.0	3b	Approved
Whaddon Farm Solar Park	PL/2021/03061	Trowbridge	33.6	3a – 15.6 3b – 18.0	Approved
Allington North Solar Farm	PL/2024/09410	Chippenham	15.9	3b – 13.2 4 – 2.7	Approved
Malmesbury Road Solar Park	PL/2021/09153	Cricklade	18.0	3b	Approved
Water Eaton Farm	14/04326/FUL	Latton	60.8	3b – 52.0	Approved
Down Barn Farm	19/10890/FUL	Cholderton	95.0	4	Approved
Mopes Lane Solar	PL/2024/08441	Swindon	23.0	3b	Approved
Battens Farm	N/13/01311/FUL	Chippenham	24.2	Not assessed	Approved
Marsh Farm	N/12/02104/FUL	Brokenborough	34.0	“Grade 3” Not assessed	Approved
Lower End Farm	14/02273/FUL	Marston	14.4	Provisional Grade 4 Not assessed	Approved
Spittleborough Farm	13/02191/FUL	Wootton Bassett	22.7	Provisional Grade 3 Not assessed	Approved
Marsh Farm	14/00592/FUL	Hilperton	22.7	Provisional Grade 3	Approved

				Not assessed	
Rodbourne Rail	N/12/01122/FUL	Corston	17.0	Provisional Grade 3 Not assessed	Approved
Poulshot Lodge Farm	13/05244/FUL	Devizes	32.2	Provisional Grade 3 Not assessed	Approved
Codford Solar Farm	PL/2023/03024	Codford	22.5	3a – 3.4 3b – 16.9 4 – 2.2	Approved
East Farm Codford Extension	13/05001/FUL	Codford	10.2	Provisional Grade 3 Not assessed	Approved
Park Grounds	15/07373/FUL	Wootton Bassett	22.0	3b	Approved
High Penn Farm	N/12/04169/FUL	Calne	30.0	Provisional Grade 3 Not assessed	Approved
Brook Hall Farm	15/05656/FUL	Trowbridge	45.0	3b	Approved
Cockhill Farm	14/05596/FUL	Trowbridge	72.0	Provisional Grade 3 Not assessed	Approved
Stokes Marsh Farm	13/02309/FUL	Coulston	49.7	Provisional Grade 3 Not assessed	Approved
North of Ashton Road	15/07413/FUL	Steeple Ashton	13.0	Provisional Grade 4 Not assessed	Approved
Braydon Manor	N/13/01723/FUL	Swindon	14.8	Provisional Grade 4 and 3 Not assessed	Approved
Castle Combe Circuit	14/06821/FUL	Castle Combe	29.4	2 – 5.6 3a – 3.1 3b – 20.7	Approved
Coombe Bissett Solar Farm	14/10548/FUL	Coombe Bissett	40.2	Provisional Grade 3 Not assessed	Approved
Manor Farm	14/03084/FUL	Wadswick	14.2	Provisional Grade 3 Not assessed	Approved

9 Glossary

Term	Acronym	Definition
Agricultural Land Classification	ALC	The grading of agricultural land according to its long-term inherent capability to produce biomass.
Best and Most Versatile	BMV	Grades 1, 2 and 3a in the ALC system
Department of Environment, Food and Rural Affairs	Defra	The UK's ministerial department for matters relating to the natural environment, food and farming.
Development Consent Order	DCO	The process of granting consent for projects of national significance
Energy from Waste	EfW	The process of converting non-recyclable waste into power.
Environmental Land Management	ELM	The agricultural policy of England
Institute of Environmental Management and Assessment	IEMA	Former membership body for sustainability and environmental practitioners
Institute of Sustainability and Environmental Professionals	ISEP	A membership body for sustainability and environmental practitioners.
National Planning Policy Framework	NPPF	The Government's planning policies for England
National Policy Statement	NPS	Statements of Government objectives for developing nationally significant infrastructure
Nationally Significant Infrastructure Project	NSIP	Large scale, strategic developments of national importance.
Planning Inspectorate	PINS	Government body dealing with national infrastructure planning applications and appeals
Sustainable Farming Incentive	SFI	A branch of agricultural policy in England