Planning Act 2008 - Application for a Development Consent Order for Green Hill Solar Farm Application Ref: EN010170

An objection in relation to Agricultural Issues. July 2025.

Summary

As this document exceeds 1500 words here is a summary of my objection. The applicants' proposal is to construct a solar farm on land which is substantially classified as Best and Most Versatile and is predominantly used for production of cereal crops.

It is likely the majority of UK residents are in favour of renewable sources of Energy including solar farms, it is also likely that UK residents will consider energy security of prime importance.

From the above it is equally important that we as a nation maintain and preserve our precious agricultural lands which produce cereals, particularly in the future as the effects of climate change, increases in population, GDP growth and demands in animal feed take hold, certainly over the next 60 years and beyond thus maintaining our food security with respect to cereal production.

Inevitably there are alternative sites (to the current proposals) in the eastern UK which can accommodate solar farms on land which is not good agricultural land for food production. Perhaps not surprisingly this is a requirement of the current UK planning policies.

The above represent extremely important considerations and it can only be concluded that the developer / applicant seriously researches and identifies other sites which do not comprise our future food security, but contributing to our energy security thus ensuring the important responsibility of duty of care (incumbent in all of us) has been fulfilled for future generations.

1 Applicants reference documents

- Environmental Statement Non-technical summary (part 1 of 2) APP/GH6.5
- Chapter 20 Agricultural Circumstances APP/GH6.2.20

2 Agricultural Land Classification (ALC)

The non-technical summary report (paragraph 21.2.4) advises that 65% of the development land covers Best and Most Versatile (BMV) land amounting to 854.5Ha. The remaining 35% of the development comprises non BMV land.

I have reviewed the ALC maps produced by DEFRA on the internet and in particular the East Midlands region. The map indicates the bulk of the development is on land considered very good (grade 2) and good (grade 3) agricultural land and substantially exceeds the applicants estimate of 65%. We have not at this stage obtained detailed mapping from DEFRA.

An extract of the agricultural land map for the East Midlands region is presented at the end of this statement as exhibit 1. An overlay of the applicant's development area has been superimposed on the land use map and presented as exhibit 2. The overlay shows the applicant's development over

grade 2, (very good- shaded light blue) lands particularly surrounding the village of Mears Ashby, with remainder overland grade 3 (good –shaded green).

3 Lifetime of the development

The applicant advises in paragraph 1.1.5 of the non-technical summary document that the operational lifetime of the development will be 60 years. This equates to in excess of three generations, affecting our children, grandchildren and probably our great grandchildren. On this basis we all have a significant responsibility to make the right decision on this development proposal, and indeed similar alternative developments.

4 UK legislation- Planning issues

The applicant has conveniently listed planning policies relating to the solar farm proposals. These are provided in Chapter 20 Agricultural Circumstances

The important / relevant documents are as follows:

Planning policy document	Applicants Chapter 20 paragraph	Summary statement
National policy statement (NPS)for Energy (EN1)	20.3.3	Applicants should seek to minimise impacts on the best and most versatile land (grades 1, 2 and 3a), and preferably use land in areas of poorer quality (grades 3b, 4 and 5)
	20.3.7	The Secretary of State should ensure that applicants do not site their scheme on 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 higher quality.
National policy statement (NPS)for Renewable Energy infrastructure (EN3)	20.3.9	'While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible
National Planning Policy Framework (NPPF)	20.3.21	Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.'
North Northamptonshire Joint Core Strategy 2011-2031	20.3.22	Soils are an important asset in geodiversity, providing a growing medium for many resources including food and non-food crops. Soils should be protected from pollution and the best and most versatile agricultural land should be safeguarded, wherever possible'
Use of previously developed land and use of undeveloped land of Local Plan 2030 (Bedford Borough Council?)	20.3.23	Where significant development is demonstrated to be necessary on agricultural land, poorer quality land should be used in preference to the best and most versatile agricultural land (grades 1-3a). Where the site is located on agricultural land outside existing settlements applicants will be required to provide evidence of the grade of agricultural land and, where that land is likely to be grade 3 or higher undertake detailed survey of the land quality.
Milton Keynes Council Plan 2016-2031	20.3.25	'In assessing proposals for the development of greenfield sites, the Council will take into account the economic and other benefits of the best and most versatile agricultural land. Development involving the loss of agricultural land should seek to use areas of poorer quality land (grades 3b, 4 and 5 of the Agricultural Land Classification) in preference to that of a higher quality unless other sustainability considerations suggest otherwise'.

In summary, there is a significant consensus in national and local planning policies (reinforced by National Policy Statement for renewable energy infrastructure NPS EN3) that the proposed development should be directed towards poorer quality land. On review of the current documents produced by the developer no alternatives have been considered.

The NPPF summarises the planning policies listed above- '*Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered'*

5 Food production within the proposed development area.

The bulk of fields within the proposed development site are arable and grow cereals such as wheat and barley.

6 UK food security.

I have reviewed the UK food security index (UKFSI) available on the internet (Gov.uk) July 2024. The index gives an assessment of the state of food security 2023 to 2024 using the latest available evidence.

The UKFSI states the UK produces most of the cereals, meat, dairy, and eggs that it consumes.

The following table shows the current UK production to supply ratio by food type, 2022 (figure 5 in the UKFSI). The production to supply ratio compares the value of what is produced in the UK with what is consumed. Viewing the ratio by food type shows the varying levels of reliance on imports.

Food type	**Percentage**
sheep	107
Milk	105
Poultry	96
Cereals	92
Eggs	90
Cattle	87

While the overall production to supply ratio has not changed significantly since the 2000s, cereals production is susceptible to year on year change due to extreme weather events. In 2020 there was a 26% drop in production due to extreme bad weather, while 2022 saw an 8.5% increase. Reductions in the 2024 harvest are anticipated, particularly for wheat, due to recent wet weather and flooding, with less severe impacts on wheat in Scotland (AHDB). The medium to long term expectation is that demand and production for arable crops will increase due to population, GDP growth and demand for animal feed.

In conclusion, whilst the UK has a currently considered nearly self-sufficient in cereal production at a 92 % production to supply ratio, the effects of climate change, increases in population, GDP growth and demands in animal feed, certainly over the next 60 years (advised lifetime of the proposed solar farm) is likely to substantially reduce this value. On this basis, it must be necessary to maintain our precious agricultural land resources in order not to reduce the production of cereal crops for future generations.

7 Duty of care

We all have a duty of care to our future generations.

The directors of Green Hill Solar Farm limited and their investors whether UK based or overseas all have a duty of care to future generations, which will include their current children, grandchildren and probably great grandchildren to ensure development proposals are in the best interests of their future generations and indeed future generations of UK residents. Companies also have a corporate responsibility.

The land owners associated with the current proposals, which we understand include local land owners, and larger corporate land owners such as the Oxford University (conglomerate of colleges) and Compton Estates. The individuals, directors, and responsible persons associated with land ownerships again have a duty of care to future generations, which will include their current children, grandchildren and probably great grandchildren to ensure development proposals are in the best interests of their future generations and indeed future generations of UK residents. Companies also have a corporate responsibility.

The Secretary of State, and advisors employed in the planning system all have a duty of care to future generations, which will include their current children, grandchildren and probably great grandchildren to ensure development proposals are in the best interests of their future generations and indeed future generations of UK residents.

We, the local residents in close proximity to the current development, equally have a duty of care to future generations, which will include their current children, grandchildren and probably great grandchildren to ensure development proposals are in the best interests of their future generations and indeed future generations of UK residents.

8 Alternative sites.

I recognise the current solar farm proposals has a reasonably good connectivity to the Grendon electricity substation located on a 400KV overhead power transition line heading towards London. This substation however is located about 14.4km (as the crow flies) south of the proposed solar farm near the village of Old in Northamptonshire, thus not so conveniently located.

There are other numerous points of connection. Just look at the following web site which shows electricity network routes, and power sources: https://openinframap.org/#2/26/12

Northamptonshire and some of the surrounding counties were subject to large opencast extraction of iron rich geological deposit of the Northampton Sands principally in the late 1800s up until around the 1970s as a source of Iron Ore. Much of this was ultimately processed in Corby, but other smaller ironworks were located in the northern parts of Northamptonshire. Most of these quarries have been backfilled and some redeveloped for housing and industrial developments. Many remain undeveloped and cannot be classified as prime agricultural land. As an example the London Road solar farm, near Irchester capable of generating 56MW of electricity has been built over a restored opencast ironstone quarry.

9 Letter to The Prime Minister dated 11th July 2025

I have been sent a copy of a letter from my local MP signed by a number of members of Parliament and indeed members of the House of Lords. For ease of reference a copy is attached at the end of this document. The letter is self-explanatory and reinforces to need to site solar farms on land not considered Best and most versatile. I have not seen a copy of a response from the Prime Minister.

10 Overall conclusion.

It is likely the majority of UK residents are in favour of renewable sources of Energy including solar farms. It is also likely that the majority of UK residents will consider energy security of prime importance.

From the above it is equally important that we as a nation maintain and preserve our precious agricultural lands which produce cereals, particularly in the future as the effects of climate change, increases in population, GDP growth and demands in animal feed take hold, certainly over the next 60 years and beyond thus maintaining our food security with respect to cereal production.

Inevitably there are alternative sites (to the current proposals) in the eastern UK which can accommodate solar farms on land which is not good agricultural land for food production. Perhaps not surprisingly this is a requirement of the current UK planning policies listed in section 5 above.

The above represent extremely important considerations and it can only be concluded that the developer / applicant seriously researches and identifies other sites which do not comprise our future food security, but contributing to our energy security thus ensuring the important responsibility of duty of care (incumbent in all of us) has been fulfilled for future generations.

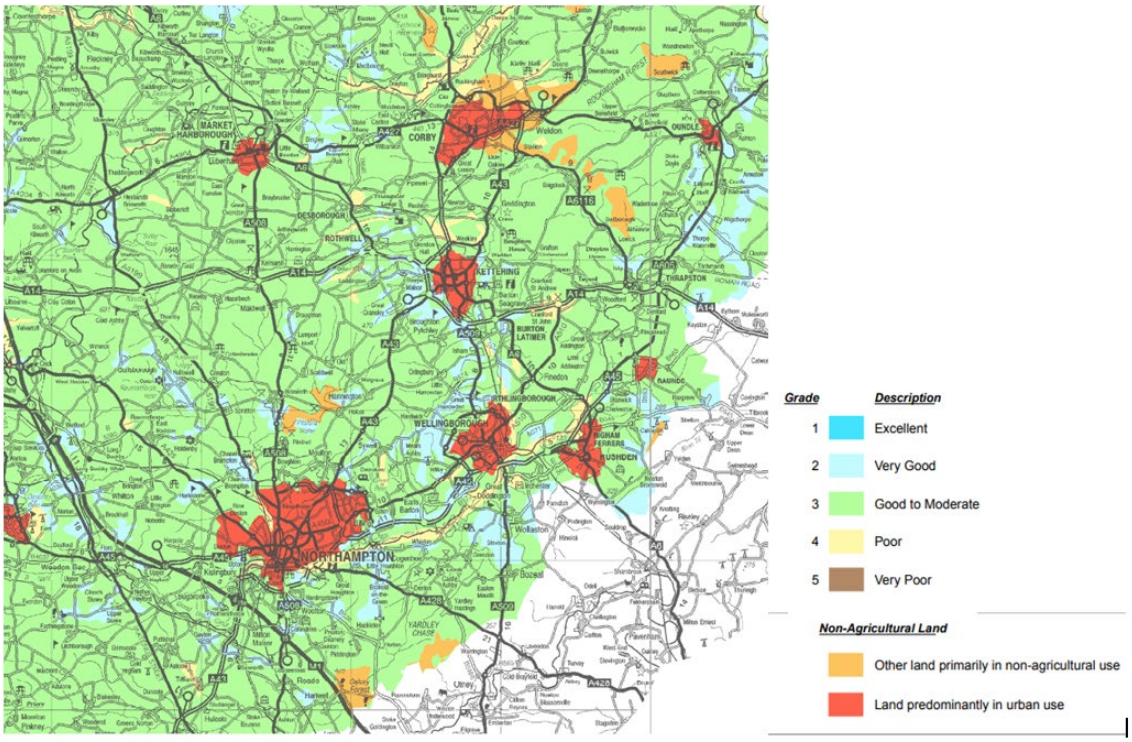

Exhibit 1 Extract copy of Regional Agricultural Land Classification Maps (Eastern England) by Natural England

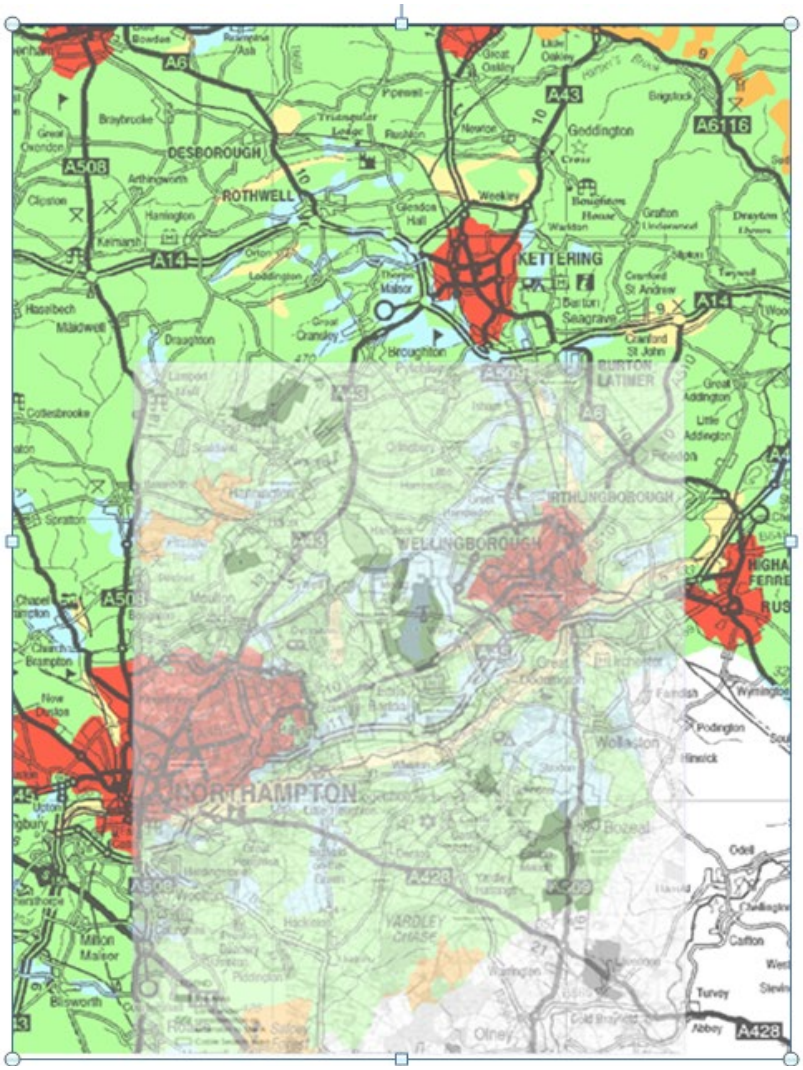

Exhibit 2 Extract copy of Regional Agricultural Land Classification Maps (Eastern England) by Natural England with an overlay of the applicants development proposals.

The Prime Minister,
10 Downing Street,
London,
SW1A 2AA.

11 July 2025

Protect our BMV agricultural land from large-area solar farm development

Dear Prime Minister,

The need for effective policy to transition away from fossil fuels and decarbonise our energy system is clear and indisputable. However, in pursuing this goal, we must not sacrifice our nation's food security or the integrity of our agricultural landscape.

While planning guidance discourages development on Best and Most Versatile (BMV) land, there is no legal ban. The classification of large-area solar farms as Nationally Significant Infrastructure Projects (NSIPs) and the additional powers granted to them as Critical National Priorities mean the planning process now permits these developments to be approved on the UK's most valuable farmland.

Analysis from SolarQ indicates that solar installations are being disproportionately sited on better quality farmland, Agricultural Land Classification (ALC) Grades 1 to 3 (that includes BMV land Grades 1, 2 and 3a) rather than on poorer-quality land. There is three times more Grade 5 land (the lowest quality) than Grade 1 land in England, yet solar installations occupy over 20 times more Grade 1 land than Grade 5 land (0.68% vs 0.03%). This reflects a seriously flawed approach to land use and planning.

The consequences of continuing on this path are profound. The UK currently imports 46% of its food, making it the world's third-largest food importer. Arable land is already under pressure, having declined to just 14.8 million acres—the lowest level since the Second World War—with nearly 100,000 acres lost annually. Meanwhile the population of the UK continues to rise; it has risen by more than 10 million since 1990. Climate projections suggest the proportion of UK land classified as BMV could fall from 38% today to just 11% by 2050. At such a critical time, large-scale solar farms are removing hundreds of hectares of productive farmland from cultivation.

We are therefore calling for:

1. An unequivocal ban of large-area solar installations on Best and Most Versatile (BMV) agricultural land (ALC grades 1, 2 and 3a).
2. In light of the likely reduction of BMV land as a result of climate change, inclusion of ALC Grade 3b in the BMV category.
3. A policy promoting a rooftop-first and brownfield-first approach to siting solar installations at local, regional and national levels.

The transition to Net Zero must not come at the cost of our food production and proud agricultural industry. We urge you to take immediate action to safeguard the land that will feed future generations.

Yours sincerely,

Robbie Moore MP
Kevin Hollinrake MP
Sir David Davis MP
Roz Savage MP
Helen Whately MP
Llinos Medi MP
Stuart Andrew MP
Nick Timothy MP
George Freeman MP
Sarah Bool MP
Andrew Rosindell MP
Ben Obese-Jecty MP
Sir Edward Leigh MP
Greg Smith MP
Dame Karen Bradley MP
Dr Caroline Johnson MP
Danny Kruger MP
Andrew Snowden MP
Sir Christopher Chope MP
Richard Fuller MP
Lord Mott
Lord Alton of Liverpool
Baroness Hodgson of Abinger
Baroness Redfearn
Lord Curry of Kirkharle
Lord Thurlow
Baroness Meyer
Baroness Harris of Richmond
Baroness Mobarik CBE
Lord Taylor of Holbeach