

**THE CASE FOR MAINTAINING THE PROPOSED SITE FOR LONGFIELD SOLAR FARM
AS AGRICULTURAL LAND
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1. GOVERNMENT POLICY

Government policy has consistently aimed to protect valuable farmland. Most recently:

Energy Security Strategy (7/4/22)

“We will continue supporting the effective use of land by encouraging large scale projects to locate on previously developed or lower value land”.

Food Strategy (13/6/22)

Para 1.2.2 “it is possible to target land use change at the least productive land”

Historically the policy to protect valuable farmland can be traced back a long way, e.g. Government policy for England is set out in the National Planning Policy Framework (NPPF) published in March 2012 (paragraph 112). Decisions rest with the relevant planning authorities who should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary local planning authorities should seek to use areas of poorer quality and in preference to that of higher quality. The Government has also re-affirmed the importance of protecting our soils and the services they provide in the Natural Environment White Paper *The Natural Choice: securing the value of nature (June 2011)*, including the protection of best and most versatile agricultural land (paragraph 2.35).

A further example is provided in the letter below written just over a year ago:

Eddie Hughes MP, Ministry of Housing, Communities and Local Government (in a letter dated 2nd June 2021 to Kemi Badenoch, MP):

‘There are strong protections in place within national planning policy which guards against inappropriately sited solar farms...expects local authorities...to take account of the benefits of the best and most versatile farmland, to enhance the biodiversity and recognise the character and beauty of the countryside....Where a proposal involves Greenfield land, local councils are expected to consider whether the proposed use of any agricultural land has been shown to be necessary. Where high-quality agricultural land is involved, this would need to be justified by the most compelling evidence. We have been clear that the need for renewable energy does not automatically override environmental protections and the planning concerns of local communities, and that the views of local communities should be listened to....Where relevant planning considerations are raised by local residents these must be taken into account by the local council’.

IT IS QUITE CLEAR THAT GOVERNMENT POLICY IS TO PROTECT VALUABLE FARMLAND.

2. NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

The updated NPPF was released in July 2021. The Longfield proposal should be rejected on the basis;

- 2.1 It conflicts with the updated NPPF (July 2021) which includes a strengthening of the environmental objective –requiring sustainable development to protect and enhance our natural, built and historic environment including making effective use of land and improving biodiversity.
- 2.2 The use of greenfield land for large-scale solar developments conflicts with NPPF Chapter 11 (Para 119) as it does not make effective use of land.
- 2.3 It conflicts with NPPF Chapter 15 – Conserving and Enhancing the Natural Environment (specifically Paras 174-175 and 183) where it is clear that the best and most versatile land should not be developed unless there are exceptional reasons and where the economic and other benefits of this land as it is currently used MUST be taken into consideration. This policy section also clearly states that planning policy and decisions should protect and enhance valued landscapes.
- 2.4 The development will cause harm to the context and setting of local heritage assets and the application is therefore contrary to NPPF Chapter 16 – conserving and Enhancing the Historic Environment (specifically paras 189, 194, 195, 199 and 200).
- 2.5 It conflicts with the updated NPPF's emphasis on preserving tranquillity (Para 185. *Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason*) and the Government planning guidance regarding noise and existing areas of tranquillity.

This paper concentrates on change of land use being damaging in the context of loss of valuable farmland. The paragraphs above relating to the NPPF illustrate there are other issues with land use change not just relating to food production and these apply to the Longfield proposals.

Postscript:

The above paragraphs have concentrated on the NPPF and also government policies. It is of note that the Solar Trade Association best practice guide includes 'the avoidance of high-grade agricultural land'.

3. AGRICULTURAL LAND CLASSIFICATION FOR LONGFIELD SOLAR FARM (ALC)

N.B. A separate paper is attached which is an analysis of an ALC report prepared by Land Research associates (LRA) for Longfield Solar farm.

The ALC for the proposed Longfield Solar Farm on the 1:250000 maps showed the entire site to be ALC grade 2. As such, the entire site would be classified as BMV and should be protected. The ALC maps are regarded as acceptable for strategic purposes but developers should carry out a detailed ALC for specific developments.

The survey covered 637.6 hectares which was the original site proposed for the solar farm prior to the non-statutory consultation. The site for solar panels was redefined as 432 hectares in the revised public consultation document. The survey resulted in a significant downgrading of Grade 2 land to Grade 3a and Grade 3b. As a result, the area of BMV land is reduced (based on the Natural England definition 2021).

637.6 ha	93.4 Grade 2	}	264.5 BMV = 41%
	171.1 Grade 3a		
432 ha	55 Grade 2	}	158 BMV = 37%
	103 Grade 3a		

The detailed analysis of the ALC by LRA indicates that the reality is that 55% of the site is BMV by the Natural England definition of BMV as 1-3a. Overall, the site is accepted as valuable farmland. Based on government policy for BMV land, then the whole site should be protected in accordance with NPPF.

4. WHAT CONSTITUTES BMV LAND?

In 2015 the Ministry for Housing & Local Government (MHCLG) issued guidance on Best and Most Versatile Land (BMV) and that was classified as Grade 3b and above.

In February 2019 a question was addressed to DEFRA by Rosie Cooper M.P. The reply from George Eustice was that BMV is classed as Grade 3b and above.

On 29/6/22 the Environmental Audit Committee of the House of Commons met. The key exchange relating to BMV is quoted below.

Q8 James Gray: Very briefly on a remark you made a moment ago, have you had recent discussions with the Department for Planning? I had a letter from it yesterday indicating it thought that grade 3b land was perfectly acceptable for solar. Is that right or not?

George Eustice: It is not right. This is something that we are discussing across Government at the moment. I looked at this issue in some depth in about 2015 when we had something of a solar rush at that time. We agreed with the then MHCLG that its chief planning officer would issue guidance to planning authorities that created a strong presumption against solar farms on the best and most versatile land and that is classified in law as grade 3b or above. Grade 3b land is classified as BMV land, best and most versatile.

Q9 James Gray: That needs to be clarified. At the moment DCLG is saying 3b is allowable for solar and you have said the opposite, so it needs to be clarified within Government. I think your point that 3b is not acceptable is spot on and absolutely right.

George Eustice: We issued this guidance, as I said, about six or seven years ago and this problem was resolved for some time. We are conscious that there have been a few quite big schemes in recent months or over the last 12 months where planning authorities seem to have either forgotten or started to disregard that advice. I don't think that new guidance was issued by MHCLG but if, as you say, it doesn't understand

the legal definition of BMV land obviously we will that up with it, but 3b constitutes BMV land.

Several MPs have received confirmation that the above represents government policy.

James Gray M.P. "Hansard speaks for itself and is decisive in a court of law."

Sir Oliver Heald M.P. (also a Q.C) "The Minister's statement in the House of Commons proceeding and recorded in Hansard can be relied on as a statement of Government policy."

IT MUST BE CONCLUDED THAT THE ENTIRE LONGFIELD SITE IS BMV AND SHOULD NOT BE DEVELOPED AS A SOLAR FARM.

5. **LAND USE AND FOOD SECURITY**

UK land loss: Average land loss to UK agriculture has been assessed at 40,000 hectares (96,000 acres) a year and rising. In reality, the figure could be a lot higher, with woodland targets set at 30,000 hectares a year, and infrastructure projects and housing expanding and increasing land usage. A study by the UK Centre of Ecology and Hydrology suggested a loss of two million acres between 1990 and 2025, and a study by the University of Cambridge 2014 suggested a land shortfall to farming of two million hectares (4.8 million acres) by 2030. Every projection shows that loss of productive land and new environmental schemes, while fundamentally a good thing, will reduce food productivity; the same applies to woodland areas. Land being used for energy purposes, e.g., the production of biofuels or for solar farms, will further reduce the food-growing areas e.g., the three major proposals in Essex, Cambridgeshire and Kent will take up 5500 acres.

Climate change and food production: A report from the University of Minnesota in conjunction with other universities has stated that the world's top 10 crops (barley, cassava, maize, oil palm, rapeseed, rice, sorghum, sugar cane, wheat) supply 83% of all calories produced on crop land. They state that yields have long been projected to decrease and that new research now shows that climate change has already affected production of these key energy sources. The average reduction is 1% and the impacts are greatest in Europe, Southern Africa and Australia. A UN report in 2019 stated that 10% of the world's population was undernourished and "climate change will accelerate the rate of severe food shortages". A report from The European Environment Agency in the same year said "Crops and Livestock production is projected to decrease and may even have to be abandoned in Europe's southern and Mediterranean regions..... any benefits would be outweighed by the increase in extreme events negatively affecting the sector." Specific examples in Europe include Spain where two thirds of the country is considered to be vulnerable to increasing desertification and accelerated soil erosion. Many African countries will be severely affected, for example 98% of Kenya's agricultural activity is rain fed and highly susceptible to climate change. In the USA research (USDA Tech Bull. 1935) indicates that climate change will lead to a decline in yield and nutrient density in key crops as well as decreased livestock productivity.

Climate change and food production in the UK: A report on food Security in the House of Commons library published in 2020 states that climate change will produce significant risks to UK food supply. The government Energy White Paper (December 2020) states that if there were no further temperature rise than 15% of UK land is classified as poor. If temperatures

rise by 4 degrees centigrade then this poor land would increase to 70% of the total leading to a massive decline in UK food production.

A risk assessment produced for parliament (June 2022) emphasised the changes to food importation as a result of climate change.

Sources of food imports into the UK: 40% of all food consumed in the UK is imported (25% of indigenous food types). 30% of all the food that is imported comes from the EU. 19% of fruit and vegetables come from Spain and 11% from the Netherlands. Overall, 45% of vegetables are imported and 84% of fruit, 4% of food imports come from Africa with Kenya and South Africa being the dominant countries. A further 4% of food imports come from North America and 4% from South America. The majority of wheat the UK imports comes from the EU. 15% of wheat for flour is imported.

Conclusions: Analyses of imports against climate change impacts suggests that several countries the UK imports from will face problems; these include the EU and Spain in particular. Africa and especially Kenya and South Africa will also be hard hit by climate change. There will also be significant impacts in Australia and some South American countries.

The overall food importation level is complex and is further affected by population growth and levelling off of crop yields, fragility of supply chains and a range of other factors. The war in Ukraine has added to the problems and complexity.

THE CONCLUSION MUST BE THE UK IS LIKELY TO IMPORT MORE FOOD AND THIS WILL BECOME MORE DIFFICULT AND MORE EXPENSIVE. IT IS THEREFORE ESSENTIAL TO MAINTAIN ALL VALUABLE FARMLAND IN PRODUCTION.

6. LAND LOSS AND SOLAR FARMS – the cumulative effect

Longfield Solar Farm, if approved, would occupy a large area of Essex. The order limits are 453 ha (1087 acres). However, by itself this would not have a significant impact on national land use. Schemes such as Longfield must be viewed in a national context which will reflect the cumulative effect of all the solar farm proposals in the country.

6.1 The current scale of solar farms

There are no accurate statistics available. The Solar Trade Association claims that only .1% of UK land is under solar panels. If this is the case it would represent 56000 acres most of which would be on farmland in England. The Energy Security Strategy paper states that there is currently 14GW of solar capacity. 1GW requires 5000 acres and therefore 14GW would require 70000 acres of land (approximately 30000 ha).

The issue is the potential loss of land as solar farms grow in numbers. There are a number of NSIP proposals that are or will be before the Planning Inspectorate. This should allow some level of national control over the larger schemes. There are many hundreds of applications going through local planning authorities. The Energy Security Strategy states the Government expects a five-fold increase in solar by 2035. This would require an additional 350000 acres which is 3% of the cropable area of England. This would impact food production, particularly since land loss is increased in many other ways not least the growth in bioenergy crops.

In England there are 21 million acres of agricultural land. 39% of this area is Grade 4 & 5. 8 million acres of poorer land is potentially available. The conclusion must be that nationally there is no need to use valuable land for solar.

6.2 Solar Farms – the Essex context

Longfield state (para 6.7.32) that using ALC maps shows no prevalence of higher-grade land in the vicinity of the scheme. The maps used in the documentation also show that the scheme is all on Grade 2 land and most of the land to the south and south-west is Grade 3 (the bulk of which is Grade 3b). On page 79, the map provided indicates there is ample low-grade land within the vicinity of 400Kw NETS power line.

There is therefore ample lower grade land in the area and no serious attempt appears to have been made to investigate its usage. The Longfield site has been chosen for the convenience of a single site with one owner rather than the proper use of land.

It should be noted that in Essex there are 70000 acres of poor grade land.

7. CONCLUSIONS

- 7.1 Government policy is clearly to protect valuable farmland from change of use.
- 7.2 The NPPF provides guidelines that clearly direct planners to protect valuable land.
- 7.3 The ALC for Longfield using the Natural England definition of BMV as 1-3a still shows over 50% of the land as BMV.
- 7.4 It is clear that government policy includes 3b land as BMV and therefore the entire Longfield site is BMV and must be retained as farmland.
- 7.5 Food Security is critical for the country. Climate change will increase the risks of food importation. To maximise home produced food production valuable farmland must not be lost.
- 7.6 The cumulative effect of all the solar farms being planned for could lead to a significant land loss.
- 7.7 There are many potential sites for solar farms that would meet government expectations, including commercial roof space, domestic housing, brown field sites and poor grade land.
- 7.8 The Longfield proposals have made no serious attempt to find alternative sites and there are plenty of suitable areas in Essex which are not on valuable farm land.