

LONGFIELD SOLAR FARM EXAMINATION
Written Representation from the Campaign to Protect Rural England (Essex)
August 2022

Further to our comments previously submitted on 24 May 2022 - which, inter alia, included concerns regarding the impact of the proposed development on the landscape, biodiversity and the local community - the key strategic issue for CPRE Essex relates to the **loss of best quality agricultural land and the associated impact on food security.**

1. Government guidance has for many years indicated greater support for offshore wind farms and repeatedly aimed to discourage solar farms on productive agricultural land. The Government's Energy Security Strategy (April 2022) concentrates on offshore wind and nuclear, with no targets set for solar power. The strategy states it will ensure environmental protection for ground mounted solar and large-scale solar projects will be encouraged to locate on previously developed or lower value land.
2. All the land affected by the proposed Longfield solar farm is good quality agricultural land, the majority being Grade 2. National Planning Guidance indicates a strong presumption against solar farm development on the 'best and most versatile farmland' (classified as Grades 1, 2 and 3a). Similarly, the BRE 'Planning Guidance for the Development of Large Scale Ground Mounted Solar PV Systems' also underlines the fact that National Planning Policy would not support development on higher grade agricultural land and specifically states that 'the best quality land should be used for agricultural purposes'.
3. Up and down the country, there are blatant inconsistencies in the planning system that are allowing development on thousands of hectares of BMV land that the Government says should be protected and prioritised for food production. The potential loss of increasing BMV agricultural land to solar farms is therefore extremely concerning as food production loss is adversely impacted. UK food production is around 50% of total need - to improve food security, the target is 70%. Current events in Ukraine have underlined the urgent need to become more self-sufficient with less reliance on imports of basic foodstuffs. The National Planning Policy Framework generally aims to protect agricultural land of this calibre.
4. Fundamentally, a single scheme of this size in this location should not be allowed when a number of dispersed smaller sites utilising 'brownfield' or low grade agricultural land would be much more appropriate and acceptable. There has been no evidence given that other sites have been considered, with this site being favoured by the convenience of having a single landowner - despite the scale of the project being totally inappropriate to the area.
5. In June of this year, George Eustice MP, Secretary of State for Environment, Food and Rural Affairs, was questioned about the use of farmland for solar power in light of the surging number of projects approved and in the pipeline. He responded to a question from Sir Edward Leigh MP (Gainsborough, Lincolnshire), and pointed to Government guidance issued as far back as 2015 making it clear to local planning authorities that there should be "a strong presumption against solar farms on Best and Most Versatile land, and that is classified in law as grade 3b or above". Speaking in DEFRA Questions in the House of Commons, Sir Edward encouraged ministers to ensure that the UK maximises food production in light of the Russian invasion of Ukraine and the resultant ongoing increases in food prices. Ministers were urged to ensure Britain's food security by making sure good agricultural land is not repurposed for solar energy.

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7. New research on the scale of BMV land being developed was published in July of this year by national CPRE. 'Building on our food security' concludes that almost 14,500 hectares of the country's best agricultural land, which could grow at least 250,000 tonnes of vegetables a year based on typical yields, has been permanently lost to development since 2010. In total, this figure represents only a 0.6% loss of total identified BMV agricultural land. However, in recent years, there has been an overall increase in the amount of BMV agricultural land used for new developments, with a particular spike for projects with a start date of 2022. A total of 61 ha of identified BMV land was lost to development in 2010; this increases 100-fold in 2022, which sees project starts covering 6,500 ha of prime agricultural land and the highest rate of development identified to date.

8. CPRE believes this report is the first to quantify the scale of development nationally on the most productive grades of farmland. The east of England has seen particularly high levels of built development on BMV land, with over 3,200 hectares lost over the past 12 years. This is followed closely by the south east region, with almost 3,000 hectares of BMV land disappearing overall.

9. The research also found that, nationally, a further 1,400 hectares of the best farmland was taken out of agricultural production specifically for renewable energy projects in the same period. It estimated that this land produces less than 3% of the UK's total installed solar capacity, suggesting it's entirely possible for the Government to balance managing both food and energy security - particularly if solar panels on rooftops are prioritised.

10. A further conclusion is that climate change is likely to have severe consequences for the most valuable farmland and an increased threat to food security. Protecting the most productive agricultural land from permanent development now is vital to maintain a secure food supply in the future. How we use our land resource will become more important as the impacts of the climate emergency become evident, with significant areas of BMV land at risk of permanent flooding. Climatic change, especially rainfall patterns and accumulated temperatures, may also lead to changes in agricultural land quality that will reduce the extent of BMV land.

11. CPRE is therefore calling on the Government to introduce a comprehensive, cross-departmental land use strategy. A planning framework of this sort would balance the often conflicting demands for farming, housing and energy needs on a finite amount of land – with a firm presumption against development on BMV land.