

**Response from Chris Williams
Unique Reference 20031597**

Cumulative Effect & the Solar Campaign Alliance

I have been following closely and involved personally with the Solar Campaign Alliance (SCA), a group tracking the cumulative total of solar proposals on UK farmland. It has become evident there is an issue of lack of visibility of the larger picture across the UK in regard to solar proposals on UK farmland. The SCA currently has 30,000 acres of proposed solar development logged on UK farmland across 59 proposed schemes, 11 of which are NSIPs, with some schemes up to 3000 acres.

Projections suggest that this could rise to potentially 350,000 acres by 2035. Left uncontrolled, the cumulative effect of all these developments on food producing land will not be reversible for decades.

Land Classification

With reference to:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010118/EN010118-000912-Prof%20Mike%20Alder.pdf>

Michael Alder's paper

With recommendations from the Secretary of State George Eustice stating that grade 3b land be considered as BMV, this scheme would be 100% on BMV land.

Environment Secretary Thérèse Coffey returning from COP27 stated that she would be continuing with policy plans initiated under the former prime minister Liz Truss, which would block solar power from most farmland. She stated *"It's really important we make the best use of our land to have that food security ... It's also really important when considering land use to consider the best place to put renewable energy, which by and large most people would agree, let's use our best agricultural land for farming and make use of brownfield sites for a lot of these energy projects, too."* Coffey went on to say that *"... they had been looking at options to support farming and energy security while protecting nature and delivering on net zero"*.

DEFRA has yet to confirm the above but given strong indication that these recommendations will be acted on, there is clear argument that no such scheme should be implemented on farmland.

Land use / alternate sites

To date still no alternative sites have been suggested, with EDF admitting openly that they have not looked for one. This is not acceptable given the adequate availability of grade 4 and below land in the UK.

The UK Warehouse Association has clarified that the warehousing sector alone could deliver the entire UK requirement for 2030 forecast by the National Grid future energy scenarios (FES). Furthermore, there is very little emphasis on [Power Purchase Agreements](#) where the upfront costs for rooftop installations can be offset against the energy produced. Depending on the agreement details, this usually enables landlords to have solar installs for little to no cost at all. These are attractive schemes that have little publicised coverage.

Grid connection

Via the Solar Campaign Alliance, I have been made aware that the Secretary of State dealt with two appeals by Sawston Solar Farm Limited, both at LAND NORTH OF DALES MANOR BUSINESS PARK, WEST WAY, SAWSTON, CAMBRIDGESHIRE (APP/W0530/W/15/3012014 & APP/W0530/W/15/3013863). In that case it was specifically stated at point 19 of the decision that ***'The Secretary of State agrees with the Inspector that no weight attaches to the assertion that a connection to the national grid is an essential site requirement (IR76).***

<https://files.cambridge.gov.uk/public/ldf/coredocs/RD-H/rd-h-870.pdf>

The SoS stated that a grid connection is not a reason to grant permission, a point stated by the Longfield developers as a reason for approval in table A2, PDF page 16 of the Deadline 1A document:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010118/EN010118-000508-Longfield%20Solar%20Farm%20-%20Deadline%201A%20Responses%20to%20Relevant%20Representations.pdf>

Longfield

Additional Comments:

At paragraph 48 of the Planning Inspector's report *"The benefits of a connection to the grid are noted but this is one of many development constraints that a developer has to take into account and should not be afforded weight."*

At paragraph 49 of the Planning Inspector's report *"No weight should be attached to [inter alia] the availability of a grid connection."*

At paragraph 76 of the Planning Inspector's report *"A connection to the national grid is an essential site requirement and the availability of a connection in a part of the network with capacity to accept the output is of assistance to the appellant but it does not bring a public benefit and adds no weight to the planning case for the proposals."*

I would encourage the Inspectorate to take note of the above comments as I feel they hold the same relevance in the case of Longfield Solar Farm.

Thank you.