



SOLAR CAMPAIGN ALLIANCE

Deadline 5: Comments on Deadline 4 submissions regarding LONGFIELD SOLAR FARM NSIP

Registered Party No: 20031521

My name is Dr Catherine Judkins and I am submitting this deadline 5 submission on behalf of the Solar Campaign Alliance (SCA, [REDACTED]). Further to the submissions made recently at deadline 4 this brief report outlines our agreement with some of the points made in the submissions of others, and in particular with the submissions of Professor Michael Alder FRAgS.

The SCA is an alliance of community groups all over the UK, who believe that solar farms on productive farmland should not be permitted. There are more than enough readily available rooftop spaces which could house solar developments instead and deliver the UK's net zero ambitions. Not to mention brownfield sites, as well as land of low agricultural grade and low ecological interest.

The SCA now represents 59 groups across the UK, and this membership is growing rapidly. The schemes represented by the alliance include local planning authority solar applications as well as the much larger scale nationally significant infrastructure solar projects, of which Longfield is one. The potential land loss to the schemes within the alliance alone represents almost 30,000 acres of valuable farmland. This, of course, is before agricultural land loss to other developments is considered, and also other solar developments who may not have community groups or whose community groups may not yet be members of the SCA. As an example, the new 'mega-scale' solar development at Botley West in Oxfordshire could take up 1400 hectares (almost 3500 acres) acres of good quality farmland just on its own.

The rapid increase in ground-mounted solar applications is a huge concern, as is the increase in their size and scale. It is more imperative than ever that these schemes be appropriately sited to avoid impacts on the UK's food security.

Members of the SCA are not anti-solar or anti-renewable energy. But they do oppose the inappropriate development of solar PV on greenfield land and especially the lack of a coherent strategy to ensure that the UK's farmland is protected. The SCA also objects to the current lack of assessment of the cumulative impact of this land loss, on such a rapid scale, across the UK. Unless this is addressed, the current food security crisis will get much worse.

We concur that the Longfield application consists of a large area (over 55%) of Best and Most Versatile (BMV) farmland. According to the ALC strategic maps, the land proposed for Longfield is grade 2. The soil assessments carried out by LRA for the developer downgraded parts of this. Nevertheless, there remains a high proportion of BMV within the scheme and the whole site is considered good quality farmland.

The SCA members also agree that land of grade 3b which, due to a revision of policy, was removed from the BMV classification several years back (but may now been re-instated as BMV) can also be highly productive. A number of our members who farm 3b land reported better crop yields in this years long, dry summer on their grade 3b land compared to some of the higher grade land that they farm. This is an important consideration given that climate change is likely to lead to increasingly dry summer weather.

Productive farmland needs protection from development and we agree with the views of Professor Alder that the government is seeking to do this (statements from George Eustice, Liz Truss and more recently Therese Coffey, who has re-iterated her support of protecting farmland from solar development to preserve the UK's food security, as well as the introduction of better protection of 3b land). We welcome this and believe it would be premature to allow the Longfield development to be consented on productive farmland (including a high proportion of BMV) knowing that the UK government is looking to protect land such as Longfield from development in order to maintain (and improve) the UK's food security.

We also agree that it is essential that the cumulative loss of agricultural land at a national level is considered when reviewing applications on productive farmland. Whilst we appreciate that planning applications are judged on their own merits, the context of loss of farmland must be national. The figure outlined previously (almost 30,000 acres) demonstrates the significance of the land lost to ground-mounted solar schemes within the alliance alone. This is merely the tip of the iceberg and it would be unwise to consider the loss of large swathes of productive land at Longfield without looking at the bigger picture of the nation's ability to grow food and other crops.

This is particularly relevant today when, as noted in Professor Alder's submissions, food poverty is a major issue and inflation of food prices is at 17%. Although we recognise that multiple factors play a role in today's food security crisis, keeping valuable farmland in food production is key to help mitigate the problem. We note also, along with Professor Alder, that the UK government is looking to tackle this issue and recognises that food security is a major concern to the British public and that the UK food system needs to become more sustainable (per the recent parliamentary debate on food security on 27th October 2022).

Many thanks for your consideration.