



31st October 2022

The Right Honourable Rishi Sunak MP
Prime Minister
10 Downing Street
London
SW1A 2AA

Dear Prime Minister

We are writing to address some of the comments in the open letter from Solar Energy UK to the former Prime Minister, Liz Truss MP dated 27th September 2022 (copy attached) which purported to address some of the concerns relating to the use of land for large solar schemes, but, in fact, addressed none of them.

We were pleased to read your objection to covering our best farmland with solar panels (Telegraph 18th August 2022) and your comments relating to rooftop solar on commercial buildings, sheds and properties. We fully support solar and all forms of renewable development but not on productive agricultural land.

Who are we?

We are the Solar Campaign Alliance a group of around 50 (and growing) campaign groups made up of concerned individuals, communities and tenant farmers who are raising awareness of and objecting to large scale, ground mounted solar and battery storage schemes in various regions across the country, predominantly on Best and Most Versatile farmland (BMV). The Alliance was established around 12 months ago when it became clear that there was a gold rush on solar schemes in the UK. We represent schemes from approximately 18 acres through to Nationally Significant Infrastructure Projects (NSIPs) of up to 3000 acres with a total land loss of in the region of up to 40,000 acres. This is the tip of the iceberg.

We all support solar development in principle and want to see it delivered well, with the right intentions, in the right place and with a community focus.

Land Use

The recent Energy Statement released by the government stated it aspired to increase large scale solar fivefold by 2035. If this were the case, solar farms could occupy around 350,000 acres of farmland. This is a significant land loss – the equivalent of around 1250 ordinary size family farms.

Solar Energy UK insist such little land is required for solar but there is no mention of the necessary housing or infrastructure development, nor do they consider bioenergy crops, which, in addition, could take up a similar area.

The subject of solar energy is frequently, but incorrectly, depicted as being a binary choice between solar panels and agricultural produce. The country needs solar energy AND agricultural produce and

this can be achieved without difficulty if solar panels are located on low grade land (grades 4 and 5), brownfield sites or rooftops and agricultural produce is grown on BMV land. You get the same amount of solar energy whether panels are sited on BMV land or low grade land but low grade land can only produce low agricultural yields

The UK imports 40% of its food. A combination of land loss, variable crop yields and an increasing population means the likelihood is that more food will be imported. Just a few weeks ago, the Deputy President of the NFU, Tom Bradshaw stated we are at a “tipping point” in terms of food security. UK food supply chains have already found they are unable to source imports and are now at breaking point.

Lack of Solar Policy

When development of land is proposed for residential property, it is assessed against the requirements of national planning policies and local plans. Issues such as population growth and movement, education, transport networks etc. are fundamental to the decision making process. The position is very different in respect of proposed solar developments. The country does not have a policy for solar developments - what factors should be important, how many developments should be allowed, how local applications should be viewed in the context of national need, brown-field / roof-top developments, conflict between leasehold land and freehold land etc., In the absence of a national policy, I have heard people say that because their Local Authority has adopted a ‘sound bite’ policy that it is facing a ‘climate emergency’, this means that any application for a solar development should be granted. The proliferation of solar applications across the country makes it essential that National and Local Authorities urgently decide what the factors are that should cause applications for solar panel developments to be granted or refused. The present knee-jerk approach to planning applications should be paused whilst the authorities decide on priorities that should be applied nationwide.

BMV Land Grading

Solar Energy UK state that solar farms “*generally utilise previously developed land, such as brownfield sites and land of lower agricultural quality*”. This is simply not true. Recently the Alliance have become aware of several schemes involving high percentages of BMV land, such as Bassetlaw 100%, Scruton 97%, Drax 94%, Shropshire 97%, Camblesforth 94%, Old Malton 60%. The lack of monitoring is alarming - the BEIS Renewable database does not record the grading of land lost to solar schemes. What is not measured, is not seen.

The NPPF categorises land grades 1-3a as Best and Most Versatile farmland. Grade 3b land is considered ‘moderate quality...capable of producing moderate yields’ meaning that it is by no means poor land but is of course out of the regulated BMVL so frequently targeted and labelled by developers as “unproductive and low grade” agricultural land.

Many farmers will tell you that grade 3b land is far from unproductive farmland! In fact this year, some farmers have seen their grade 3b land perform better than their grade 1 and 2. This is due to the 3b soil’s ability to hold more moisture. This has been invaluable during the long, hot summer we have seen this year. If we are to see this weather pattern becoming more normal, we would suggest that grade 3b land is of vital importance to help address the needs of producing food within a changing, warming climate.

The Solar industry is currently focusing on land that delivers maximum financial returns, not environmental returns. Nobody is making any more farmland. There is plenty of poor land available in this country where solar can be placed, land where our food and crops cannot be grown, brownfield sites or, better still, commercial and residential rooftops.

Rooftop Solar

We, like you, firmly support solar on commercial rooftops. In fact the UK Warehouse Association report on rooftop solar, launched recently, verifies the potential of warehouse rooftops, which needs unlocking urgently to help stop the land grab. As the warehousing sector possesses approximately a third of all commercial roof space, it has the potential to double UK's solar PV capacity, which means the warehousing sector alone could deliver the entire UK requirement for 2030 forecast by the National Grid future energy scenarios (FES).

Temporary Land Use

Solar Energy UK insists that solar is a temporary and reversible form of land use and there will be no permanent loss of BMV land i.e. at the end of the 40 year development the land can revert to agricultural usage. A 40 year period is certainly permanent in the duration of a farming tenancy. It is two generations.

As no solar farm in the UK has yet ended its period of existence, it is frankly impossible to state that solar is temporary and we would like to see Natural England update their policies on solar farms and their "temporary nature".

Farming and Solar

Solar Energy UK insists that solar farms in the UK can be multi-functional and used for "*sheep grazing and continued agricultural use.*" It is widely acknowledged within the farming and solar industries that sheep rarely graze amongst panels.

In many cases solar proposals are being identified on good agricultural land because of its close proximity to a sub-station, making it easier and cheaper for developers to connect and deliver maximum financial returns for themselves and landowners. In their Best Practice Guide, Solar Energy UK state: "*it is rare to find a previously developed (brownfield) site which meets all the other requirements for a large-scale solar farm, such as grid connection and minimal visual impact, and most solar farms are developed on agricultural land.*"

Solar Energy UK state that "*well maintained solar schemes will deliver significant environmental benefits, support biodiversity, support wildlife habitats, and reduce carbon emissions*". A well-managed farm can do all of the above whilst at the same time, growing this country's food. There is currently little, hard evidence to support overstated biodiversity claims within solar schemes and there is certainly no consideration given to the existing biodiversity of the land and the biodiversity which is lost throughout the hugely disruptive development stages and long term industrialisation of the land.

Tenant Farmers

In their open letter to the former Prime Minister, and despite our recent meeting with Solar Energy UK to help educate and inform, they have excluded an entire sector of the farming industry, tenant farmers. Solar proposals are being imposed on tenants against their wishes. Schemes result in colossal increases in the value of land and bring immediate benefits to the landlord and, in contrast, immediate disaster to the tenant farmer.

Tenant farmers make a huge contribution to British Agriculture. Whilst 30% of the farmland in England and Wales is subject to some form of agricultural tenancy, taking into consideration farms with mixed tenure, 64% of the agricultural area is controlled by farm businesses who have at least some tenanted land on their holdings (Rock Review on Agricultural Tenancies issued 13th October 2022).

This country's desire to hit net zero does not mean that solar development, or any other scheme deemed as "green" should override the views and the practices of those looking after the land, the environment and our food.

11 Commitments to Solar Farms established by Solar Energy UK

The solar industry themselves set these standards and often proudly refer to them, yet in reality, many of these commitments are being breached. For example, within the Alliance we have seen evidence of schemes on BMVL, schemes within protected landscapes and little suggestion of multi-functional land use. A common theme is the lack of adequate consultation and engagement with communities or tenants themselves. In the large Sunnica proposal in Cambridgeshire (2700 acres) there are threats of compulsory purchase and eviction if residents do not support the application. There are questions relating to ensuring all health and safety issues are being addressed – impossible to guarantee with those schemes including Battery Storage which like solar, is unregulated. There are also legitimate concerns with regard to the unethical sourcing of panels themselves.

BEIS Survey

The solar industry frequently make reference to public opinion based on, for example, the latest BEIS Public Attitudes Tracker: Energy Infrastructure and Energy Sources Spring 2022. According to the survey, 81% of people would be happy to have a solar farm in their local area. However, the BEIS survey does not make any reference in its questions to the public, to the type of land proposed for solar (best farmland, low grade land, brownfield sites) nor does it make reference to any of the consequences of taking such land out of production (less local, sustainable food).

Moving Forward

We would like to see a halt to large scale, ground mounted solar applications on BMVL urgently. As solar and all renewables evolve, farming methods evolve and industries become more sophisticated, we hope one day very soon that the concept of covering vast swathes of good farmland with solar panels for up to 40 years will be inconceivable. But time is of the essence! This is particularly the case following the article published in the Guardian on 10th October stating the previous Government Administration were said to be considering redefining BMVL to include grade 3b land. Whilst this is very welcome news to campaign groups like ours, we do have concerns the media are distorting the facts and claiming the Government are anti solar. It is so important to be clear and perhaps the government might reiterate their commitment to solar development on brownfield sites or better still, commercial rooftops. All of this needs to happen urgently. Developers are acting quickly in order to push through applications before the much anticipated regulations on land use and food security.

We look forward to your response on the matters raised.

Yours sincerely

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Copy:

Therese Coffey, MP, Secretary of State for Environment, Food and Rural Affairs
Mark Spence MP, Minister of State at the Department for Environment, Food and Rural Affairs
Grant Shapps MP, Secretary of State for Business, Energy and Industrial Strategy
Michal Gove, Secretary of State for Levelling Up Housing and Communities
Robert Goodwill MP, Chair of the Environment, Food and Rural Affairs Committee
Minette Batters, President of the National Farmers Union
George Dunn, Chief Executive of the Tenant Farmers Association
Mark Tufnell, President of the Country Land and Business Association
Marian Spain, CEO Natural England
All MP's of the constituents of the Solar Campaign Alliance

Enc:

Letter from Solar Energy UK to former Prime Minister, Liz Truss MP