

WA

Good morning Madam Inspector

I hope everyone had a good breakfast, whether it was full English with eggs bacon sausage tomatoes and mushrooms, maybe toast and butter with tea or coffee with milk and sugar if that is your taste, or breakfast cereal with milk, porridge, or yoghurt with chopped apple or pear. I will forgive you if you overlooked the fact that all of that came from British farms, with the exception of the tea and coffee, and that without British agriculture you probably **WOULD** be wondering where your breakfast **WAS** coming from.

As you will have guessed I am a farmer and have farmed in N Warwickshire for the last 55 years. I am against the drive for green energy at all costs, which is at the expense of good agricultural land.

This site is 96% Best and Most Versatile agricultural land and I will demonstrate why there should not be solar development on it.

We only produce 60% of our own food and therefore 40% is imported and is subject to the policies and supply lines dictated by others. Think Russia and Ukraine and now America and China.

Do not think for a moment that I am against solar panels and green energy. I fully embrace the concept and am happy to report that there are solar panels on my grain store roof and my grain is dried using biomass boilers to generate the heat. My house has ground source heat which supplies all the domestic hot water and under floor heating.

What I do object most strongly to is the siting of solar arrays on the Best and Most Valuable land which should be prioritised for the production of British food which is the best in the world and has the lowest food miles as well.

Food security and strategic supply are in a very fine balance at the moment. I understand that Supermarkets only carry one to two weeks of supply of fresh produce,(bread, meat,dairy,eggs)and that includes the supply depots. Canned goods might last a month or two depending on distribution and panic buying. Without farms there would be no new fresh food entering the system so those stocks would dwindle fast especially if people hoard. Why are we adding to this pressure by allowing solar parks on BMV land.

The inspector will be well aware of the Ministerial written statement of the 15thMay 2024 and the follow up statement in late July 2024 by the current Government.

I hope that we are in agreement that the points raised adequately cover Government policy regarding protecting the best agricultural land for food production and can only be used for solar energy when no other options are available.

I have also read the appellants agricultural evidence and while I agree with much of the report, I find there are points that are misleading if they are to be considered in the decision regarding the Appeal against NWBC refusal of planning.

POINTS RAISED AFTER READING THE APPELLANTS AGRICULTURAL EVIDENCE

Paragraph 2.10 Refers to a statement that the government has not identified a current food security problem

Govt is well aware of the importance of food security. There are no new sustainable Farm Incentive Schemes (SFIs) until 2026. These schemes were to take agricultural land out of food production for environmental benefit.

Overnight the scheme was closed to new applicants. Does this not indicate that the Govt is worried about food supplies and security?

Paragraph 3.8 Refers to there there being no agricultural evidence to show a material loss of food production.

Of course there is a loss of food production. The land was producing wheat, barley, beans and maize – all of which enters the human food chain. Either directly or indirectly – if it is used for animal feed then either the meat is part of the food chain or the animal products such as milk/cheese/butter etc is still part of the food chain. I quantify the loss to the food chain later.

Paragrapg 4.24 I think this refers to the Land Use Consultation

If “new homes, clean energy, water infrastructure and transport needs to be implemented at scale and pace” This phrase is isolated and out of context. If development is required to cope with population increases, then surely food supply will need to increase at the same scale and pace. This raises huge questions as to why solar production should override food production – especially when solar production can be located in other areas where there is not Best and Most Versatile Land.

Paragraph 6.9 There is no evidence that the land can be reinstated as is because there are no solar farms that have had a 40 year life cycle.

The division of the three larger fields with hedges and trees will make future arable cropping less likely. The fields are worked in the most efficient way and putting a barrier through the middle means twice as much turning at the ends of the fields and less efficiency in terms of time labour and machinery costs. There is also an increase in compaction on headlands at the ends of fields with results in reduced yields on the 24 meters around them due to the machinery having to turn on them. The smaller fields highlighted by the appellatant on the opposite side of the road are all permanent grass because of their size making them too small to have arable crops on them.

Paragraph

7.2 This is relying on a dual use of the land although it is likely that there will not be dual use of the land.

Dual use of the land implies that solar and grazing sheep could co exist. There are two points here. The first is that grazing sheep on solar parks is not feasible. The fact that the panels absorb the sunlight for energy means that there is no energy in the shade for the grass to grow and so no food for sheep. Grass does not grow in woodland which is shaded by the canopy of trees. Instead contractors are employed to mow any grass between the panels and use weedkiller as necessary as this is more cost effective than keeping sheep to do the job. I have yet to find anyone who keeps sheep on solar parks. If sheep are not being kept, then we do not have dual use and I worry that the green field site will then be classed as commercial and classed as grey or worse brown. 40 yrs on I doubt the site will be returned to arable farming.

Paragraph 7.5 Refers to continual arable production being not good for soils

There is no proof that continuous arable production degrades soils, otherwise we would not be able to grow crops year after year. Indeed this site has been in continuous arable production for at least the last 50 years. There is no detrimental effect as it is still classed as BMV land as proven by the test digs in the Kernon Report.

Paragraph

8.4 Refers to the land “not used directly for food production” .

The whole site is used for human food production if not directly. Animal feed is used to provide meat, eggs, milk, dairy products into the human food chain, Therefore the whole site is being used for human food production. This land has not been used for horses, energy crops, or non-food crops.

Paragraph 8.11 Refers to The Secretary of State last July speaking to Parliament about climate crisis and food production.

(Ministerial Written Statements 15th May and subsequent Ministerial Written Statement July 2024) This is an admission that there is a threat to food security by the climate crisis so why are we adding to the threat by putting solar on our best productive land? Remembering that 96% of this site is BMV.

Paragraph 8.14 Refers to the (Govt Food Security Report 11/12/24) This is outdated and incorrect. We have gone down from 75% self sufficiency then (June 2022) to 62% now less 29 months later. The trajectory is downward and therefore the importance of maintaining and increasing food production is increasing.

Paragraph 8.16 Refers to the UK Food Security Report 2021 This is purely hypothetical and shows that if we eat wheat alone then domestic calorie requirement could be met

While I do not disagree with this report it is now outdated. As noted in 8.14 production is going down . Also, it is unlikely in the extreme that people could exist on wheat as they may get calories but not nutritional requirements, which they would need from other crops and foods, such as meat and dairy and fresh fruit and vegetables. Man cannot live on bread alone. This also is pre-covid, pre putin, pre Ukraine.

Paragraph 8.17 A press release 6 Dec 2022. Again outdated. Referred to “stable trade routes” We did have these before Russia invaded Ukraine. We then saw food shortages, wheat prices went up by about 80%, agricultural inputs (fertiliser in particular) trebled in price – hardly what you call stable. With the new American administration there are no guarantees of trade and tariffs.

Paragraph 8.18 Again misleading as there is a food security problem. Supermarkets only hold one to two weeks supply of fresh food. There is current talk of bread shortages by Easter if the millers cannot source sufficient supplies of domestic milling wheat. You cant order a boatload of wheat and expect it to arrive in the next week.

Paragraph 8.21 The tables attempt to show the loss to the food chain if there is no crop production on the site. The tables and figures are completely misleading as they do not state the tonnage of produce lost to the food chain if the proposed solar park goes ahead.

I have the yields and figures from the information supplied in the agricultural report but I think the point being made is the loss to the food chain if the proposal goes ahead.

Total loss to the food chain would be 516.8 tonnes /year of wheat barley and beans. Not 65.6 as stated in the report.

8.32 Unfortunately the same values are incorrectly used;

Assuming the same crop mix as for the food assessment, the economic effects are;

Using the figures in the report again and current commodity prices the financial effect would be a £ 80,114 loss to the food chain not £12,608

The report has under calculated by 635%

Paragraph 8.36 states that the contribution of the site to national food production is negligible. It is if the figures are wrong.

The conclusion is that

- ?* the report has undercalculated the value of the crops to the national output by 11%
- ?* the report has undercalculated the value of the crops by 635% This is not limited economic benefits. This needs to be considered in the planning balance

NB

There seems to be an implication that only milling wheat for bread is any use in the food chain and feed wheat is a by product. This is not true and all feed

wheat goes into the food chain if not indirectly as animal feed then directly as breakfast cereal, (Weetabix.) and Biscuits to name two.

My wheat goes to Cerestar in Manchester. They only take feed wheat (which is what is being produced on the site). They take the (starch element) and use it commercially for such things as cakes and biscuits. The residue is turned into alcohol and mixed with flavouring etc to make alcopops. The fibre element has some of the starch that is unused added back to it, and is returned to farms as a bran type animal feed known as “Trafford Gold”. The protein element is taken out and made into vegetable proteins that are used in the food chain. It is not unused in the food chain! This plant takes 0.6 Million tonnes of feed wheat every year from British farms.!

These are the views of a farmer who has been around long enough to know that once land is built on, it has gone for ever. I have not commented on this green and pleasant land we have in the parish as others are covering that topic. I have not seen land put back into agriculture following development for infrastructure and building. Some land fill sites are reclaimed but they are not BMV land. Why not site solar on land fill for example!

“The saying they are not making land anymore” could not be truer.

The two main points to remember are

1. This site is 96% BMV land
2. Food production in this country is declining and reliance on imports cannot be guaranteed.

That concludes my reasons why I do not think there should be a solar park sited on the land alongside the Meriden Road Fillongley and the appeal should be refused.

and I support NWBC and Fillongley Parish Council in their defence.

Paragraph 8.16 Refers to the UK Food Security Report 2021

Outdated report however; However this is just ridiculous – as noted in 8.14 production is going down . Also, it is unlikely in the extreme that people would only exist on wheat as they may get calories but not nutritional requirements, which they would need from other crops and foods, such as meat and dairy and if the people are eating all the wheat then where will all the vegetables be grown? This also is pre-covid, pre putin, pre Ukraine.

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Paragraph 8.21 The following tables and figures are completely misleading as they do not state the tonnage of produce lost to the food chain if the proposed solar park goes ahead.

Paragraph 8.22 “incremental benefit” means the betterment of the choice. The calculations are wholly incorrect as they ignore the initial benefit of the average yield which is;

Average yield	Tonnage	Incremental benefit tonnage	Total if high yield	Life of proposal
32 ha wheat @ 8.3t/ha	265	38.4	303.4	12136
16ha barley @ 7.3t/ha	116.8	17.6	134.4	5376
16 ha beans @ 4.3 t/ha	68.8	9.6	78.4	3136
Total AVERAGE output	451.2	65.6	516.8 tons of food produced per year	20,648 tons of food lost to the food chain by the Appellants own calculations

Paragraph 8.23 Check the maths! The basis of 65 tonnes of produce is inaccurate and misleading it is not an annual impact of 65 tonnes it is 516.8 tonnes per year. If it was purely wheat, based on average yields it would be 531.2 tons of wheat per year.

8.32 Unfortunately the same values are incorrectly used;

Assuming the same crop mix as for the food assessment, the economic effects are;

Average yield	03/25 Price as of 25/	Gross output	Total if high yield
32 ha wheat @ 8.3t/ha	265 tonnes @ £178/t (feed wheat)	£47,170	303.4
16ha barley @ 7.3t/ha	116.8 tonne @ £156/tonne	£18,221	134.4
16 ha beans @ 4.3 t/ha	68.8 tonnes @ £214/tonne	£14,723	78.4
		£80,114	

Rather than £12608. The report has under calculated by 635%

Paragraph 8.36

The conclusion is that

- ? the report has undercalculated the value of the crops to the national output by 11%
- ? the report has undercalculated the value of the crops by 635% This is not limited economic benefits. This needs to be considered in the planning balance

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