To: The Planning Inspectorate / Somerset Energy Park Project Team (Low Carbon Limited)
From: Bleadon Parish Council
Date: 22nd November 2026
Subject: Environmental Impact Assessment (EIA) Scoping Consultation Response – Somerset Energy Park (Ref: EN0110039)

Bleadon Parish Council welcomes the opportunity to comment on the Environmental Impact Assessment (EIA) Scoping Report for the proposed Somerset Energy Park. The Parish Council recognises the national drive towards renewable energy and decarbonisation. However, it has significant concerns about the scale of the development given that it is proposed to be one of the biggest developments of its type in the UK. Given this, the Parish Council is of the view that there are a number of issues which must be rigorously and forensically addressed by the applicant in the Environmental Statement.

As a consequence, the Parish Council requests that the Scoping Opinion requires the applicant to address the following matters:

1. Brownfield Sites and Alternative Locations

The EIA must include a comprehensive and transparent assessment of reasonable alternatives.

Before open countryside and wetland moors are considered for industrial-scale solar arrays and Battery Energy Storage Systems (BESS), the applicant must demonstrate why the following cannot be prioritised:

- Brownfield sites;
- previously developed land;
- publicly owned buildings with rooftops of significant scale e.g. schools; and
- existing commercial or industrial rooftops.

The Environmental Statement should clearly justify choosing greenfield agricultural land over degraded or underused non-agricultural sites across the wider region.

2. Agricultural Land and Food Security

At the cross-party Westminster Hall Debate on the 'Impact of land use change on food security', 18 November 2025, Robbie Moore MP (Con) Shadow Minister (Environment, Food and Rural Affairs) said, "... we are, quite simply, in a food and farming emergency.". Wendy Morton MP (Con) said, "... we need a coherent national land use framework that recognises how housing, farming, environment, energy and flood management overlap. We cannot allow one Department to encourage woodland creation on productive fields, while another encourages development on the next field. Joined-up thinking is not a slogan; it is a necessity." Terry Jermy MP (Lab) said "We simply cannot improve energy

security but accept worsening food security. There cannot be a trade-off: we need both" Chris Hinchcliff MP (Lab) said, "Food security is no less essential than energy security, and farming practices that restore nature are as important as the transition to renewable energy." Dr Roz Savage MP (LD) said, "Food and energy sovereignty are not abstract concepts—they are the foundations of a healthy population and a resilient nation" https://hansard.parliament.uk/commons/2025-11-18/debates/40EF0BDF-9D30-480B-8B54-AB3731CAB688/LandUseChangeFoodSecurity

Energy should not be produced at the sacrifice of local food production. The UK should not be heavily reliant upon imported food in a number of respects. The loss of any further land currently or potentially used for food production will, therefore, only serve to exacerbate the current position. This position has been recognized by Government, with food production being identified as one of the 13 national infrastructure sectors.

Somerset's rural landscape plays a vital role in domestic food production. Removing large areas of agricultural land from food production for several decades for energy production threatens local farming livelihoods and national food security.

The EIA must include a detailed Agricultural Land Classification (ALC) survey across all five proposed development areas (Northern, Eastern, Southern, Western and Central), and must evaluate:

- The cumulative loss of all current agricultural land. For the avoidance of any doubt, this should use the relevant DEFRA land classifications and a site-specific breakdown of land by grade. The Pariah Council considers this important as grades 1-3 (BMV) are predominantly reserved for more intensive arable/crop production that feed people and animals. The overlapping grades 3-5 are pastureland for grazing animals, typically used for beef and lamb production as these grades have severe limitations that restrict their use primarily to permanent pasture or rough grazing. Any analysis which fails to address all grades would ignore the current use of the land for food production for both people and animals. The current agriculture use of the land needs to be identified and protected.
- many cross related topics and key questions need to be answered:
    - The proposed area is at sea level, what is the effect of sea levels rising in the short, medium and long-term?
    - What is the effect of climate change on food production?
    - How does this proposal fit with land in the area being used, or proposed to be used, to produce crops for anaerobic digestion for electricity production?
    - How does this project fit with proposed wildlife projects, such as the CPRE Wetland National Park Project that covers this area? https://www.cpresomerset.org.uk/what-we-care-about/nature-and-landscapes/the-big-idea-could-the-somerset-levels-become-our-next-national-park/faqs-somerset-levels-national-park-status/

- the long-term impact on local food supply chains and on the viability of tenant and family farms in the parish and surrounding areas;
- whether proposed dual use, such as limited sheep grazing, genuinely offsets the loss of arable or pastureland for beef and dairy, NB 39% of England's dairy herd is farmed in the South West https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1106562/AUK_Evidence_Pack_2021_Sept22.pdf ;
- assurance is needed that local, regional or national taxes will not be used for end of life disposal of the energy park infrastructure and equipment; and
- total restoration of the countryside needs to be guaranteed at the end of the project, with documented evidence of this being actually being achieved elsewhere needs to be presented before implementation.

3. Economic Impact

The Parish Council is of the view that the EIA should not be permitted to solely address the 'positive' outcomes in terms of assumed value to the local area through inward investment and job creation, without a thorough analysis of the consequent potential losses. The applicant's website makes the following claims in respect of local economic benefits – 'supporting investment in the area through construction activity, supply chain opportunities, business rates contributions and spending with local services and businesses.'

The Parish Council considers it imperative that the EIA must, therefore, fully cover the following:

- An assessment of the direct financial loss to the area as a result of any proposed change of use of land;
- where agricultural land is used, a clear assessment of the cumulative impact to supply chains supporting farming/countryside uses;
- any specific impacts on multi-generational farming communities;
- where the applicant is relying upon an assumption that land is able to be returned to its 'original' use at the end of a period of time, how the impact of any farming or agriculturally related lost skills and businesses will be mitigated/addressed (seasonal works, machinery mechanics, local farm shops, etc.); and
- an assessment of what local skills for the installation and maintenance of this project will be used

4. Local Impacts on Bleadon and Surrounding Parishes

The Northern and Western development areas and the associated grid connection corridors lie close to Bleadon and its neighbouring parishes. The EIA must therefore fully scope in the following:

- Flood risk and drainage: The Somerset Levels and Moors (which includes the Bleadon levels) rely on an intricate network of rhynes and ditches. The impact of

extensive impermeable surfaces, access tracks and battery compounds on surface water runoff and flood risk displacement must be assessed to the point of discharge into coastal outlets and/or treatment plants;

- traffic and highways: Construction traffic, haul roads and abnormal loads using local rural lanes and the A370/A38 corridors will severely affect Bleadon residents unless properly mitigated. The stretch of the A370 running through the Parish already has one of the highest mortality rates in the local area and the EIA should make clear how this existing issue will not be compounded. Roads in Somerset are already severely impacted by regular closures to the M5. This development will only add to the local traffic issues; and
- landscape and visual amenity: The assessment must address the cumulative visual impact of solar panels, security fencing, substations and overhead lines on the open, low-lying character of the local countryside.

Conclusion

Bleadon Parish Council expects these issues, particularly the sequential preference for brownfield land and the protection of food security, to be given full weight in the Scoping Opinion and thoroughly addressed before the wider public consultation in 2027. **It will be working closely with its neighbouring Councils on these shared issues**.

Craig Bolt

Clerk to Bleadon Parish Council