

## **Agricultural Land Classification: Supplementary Note**

**September 2020**

### **Purpose of this Note & Background**

1. This note has been prepared by Savills on behalf of Bridgend College as part of the promotion of surplus land at their Pencoed Campus. Further to discussions with BCBC Officer, it's scope is to consider planning matters related to agricultural land and should therefore be read alongside the Agricultural Land Classification and Soil Resources Report has prepared by Reading Agricultural Consultants (dated April 2020) which was previously submitted to BCBC.
2. In particular, BCBC has asked for supporting information to justify the loss of Best and Most Versatile (BMV) land. BCBC, in its letter dated 13 May 2020, acknowledge that:

*“Pencoed Campus is identified as the largest candidate site submission in Pencoed and as such is considered to be the most suitable to accommodate the required level of strategic growth. It is recommended that a brief high-level urban capacity study be carried out to demonstrate the lack of suitable alternative sites in Pencoed, in order to further support the loss of good quality agricultural land.”*

3. The Reading Agricultural Consultants (RAC) report, concludes that 49% of the total site (which includes the existing BCBC campus and land to the west of the A473) is Grade 3a, so is BMV land<sup>1</sup>. No land was assessed to be of Grade 2 land.
4. It is noted that the survey work undertaken by RAC provides a more accurate assessment of agricultural land value than the Predictive ALC Map provided online by the Welsh Government. The detailed findings of this report are not repeated in this note. Irrespective of the predictive mapping, it remains the case that the only way to determine the grade of land is by commissioning an agricultural land classification survey – which has, in this case, been undertaken.
5. Paragraph 3.55 of PPW states that the plan making and decision making process should give “considerable weight” to protecting BMV. There is however a recognition that there may be a need for the redevelopment of some BMV land with Paragraph 3.55 of PPW setting the framework for where this may be acceptable:

*“Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations.”*

### **Existing and Potential Future Use of the Site**

6. The surplus land at the Pencoed Campus, which is proposed for development, is not conventionally farmed or part of a farm business, rather is used for educational purposes in relation to the College's agriculture curriculum, as a golf course, and for sports fields. Accordingly it is not presently used for commercial agricultural purposes as a farm business and therefore development of the site would not result in a loss of livelihood or the cessation of existing operations.
7. As set out in other supporting documents submitted in support of the site allocation, critical to Bridgend College's impetus for promoting surplus land is at their Pencoed Campus is to enable the funding of enhancements across the remainder of their estate. If promotion of the site as an allocation in the Replacement Local Development Plan is unsuccessful, it is anticipated that

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<sup>1</sup> Best and most versatile (BMV) agricultural land is defined as Grades 1, 2 and 3a with Paragraph 3.54 of Planning Policy Wales (PPW) (Edition 10, December 2018) stating that it should be “conserved as a finite resource”.

Bridgend College will either look at alternative forms of development to generate revenue or continue to utilise the site for its existing purposes. Future use for agricultural purposes is therefore not anticipated.

### **The Need for New Housing in Bridgend**

8. BCBC has committed to the preparation of a Replacement LDP which triggers a need to allocate land to ensure the housing requirement is delivered. There is therefore an overriding social and economic need to deliver a sufficient housing land supply (as well as a requirement placed on BCBC by Welsh Government through the Development Plans Manual).
9. The Preferred Strategy identifies that, when the land bank, commitments, completions, and anticipated small site/windfall contributions are accounted for, there will be a need to allocate land for a further 2,942 homes in the Replacement LDP.
10. Pencoed has a significant role in accommodating this growth. It is identified as a “Main Settlement” in both the adopted and the Replacement LDP Preferred Strategy, and identified in the Replacement LDP Preferred Strategy identifies as a Sustainable Growth Area. BCBC Officers accept that the subject site is considered to be the most suitable to accommodate the required level of *strategic* growth.

### **Urban Capacity Study: Locational Considerations**

11. The Preferred Strategy is explicit in what types of sites will form allocations in the Replacement LDP. This is most apparent in the identification of a series of Strategic Growth Options for each Sustainable Growth Area.
12. Bridgend College’s Pencoed Campus is identified as the sole Strategic Growth Option for Pencoed. This reflects recognition of the site’s inherent sustainability, its deliverability, and ultimately suitability for new development, but also the lack of alternative suitable sites within Pencoed to deliver the quantum of growth required.
13. Notwithstanding this point, as requested by BCBC, a brief, and high level, urban capacity study has been carried out to demonstrate the lack of suitable alternative sites in Pencoed – as set out below.
14. A review of the Candidate Site Register shows that the Pencoed Campus site is the largest candidate site within Pencoed and therefore to deliver the same quantum of growth there would be a requirement for the allocation of a number of smaller sites, which would involve multiple land ownerships.
15. In October 2019 BCBC published their Candidate Site Assessment Report which contained a Stage 1 Assessment of all candidate sites submitted as part of the Call for Sites held in November 2018. Sites 297.C1, 298.C1, 303.C1, and 352.C43 were all dismissed as part of the Stage 1 Assessment process because they would not be suitable or align with the Preferred Strategy of the emerging LDP.

#### Brownfield Sites

16. There are no existing, available brownfield or previously development within the settlement of Pencoed which are of sufficient size to deliver the amount of strategic growth proposed in the emerging LDP.

#### Environmental Constraints

17. PPW notes that if possible alternative sites are available and it has a lower grade land, if it has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. There are no environmental or landscape designations present on land immediately to the west of Pencoed. However, there are pockets of designated Ancient Woodland, as shown highlighted in green on insert A below.

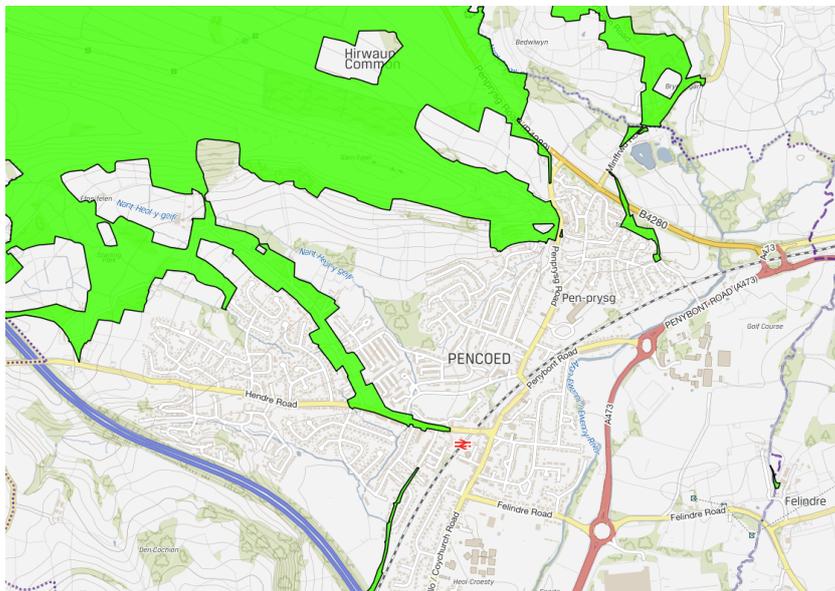
**Insert A: Ancient Woodland (Source: Savills Maps, 7/9/2020)**



**Registered Common Land – Hirwaun Common**

18. As shown on insert A below in green, a large extent of land to the north of Pencoed is registered common land, which is a significant constraint to its development.

**Insert B: Extent of Registered Common Land (Source: Lle, 7/9/2020)**



**Technical constraints**

19. Further, the adopted LDP sets a presumption against new development on the western side of the railway line in Pencoed, with Policy PLA 6 (Development West of the Railway Line, Pencoed) stating that development will not be permitted where it results in a net increase in vehicular

movements pointing to fundamental constraints on the delivery of housing in this location. Included at Appendix 1 of the Preferred Strategy is commentary on each policy in the adopted LDP and guidance as to whether it will be continued in the RLDP. This confirms that Policy PLA 6 is to be carried forward into the Replacement LDP and thus the moratorium on development west of the railway line will be continued. Given that the remainder of sizeable sites that are being promoted in Pencoed are located to the west of the railway line, making allocations in this location would be contrary to the aspirations of Policy PLA 6 and subject to significant technical difficulty of highways improvements works (and possible cost, affecting its viability).

20. It is also evident (as indicated by the contour lines shown on insert B above), that the steep topography of the much land to the north and west of Pencoed would severely constrain its development.

## Conclusion

21. The Agricultural Land Classification and Soil Resources Report prepared by RAC found there to be substantial elements of BMV within the land that is being promoted by Bridgend College.
22. It is evident that the RLDP prompts the need for additional housing to be delivered in Pencoed and that there is an intention for these to come forward to the east of the town and on a single large allocation (such as the Site) rather than on several smaller sites. To meet the aspirations of the Sustainable Growth Area therefore, it is clear that the Site at Bridgend College is the most appropriate and suitable site for development within Pencoed. Therefore, there is clearly the overriding need for this Site to be developed for the proposed residential-led allocation.
23. Whilst land to the west and north of Pencoed may have lower value in terms of its agricultural quality, sites submitted as Candidate Sites have been dismissed by BCBC as part of the Stage 1 Candidate Site Assessment or are located on the western side of the railway line where there is presently, and will continue to be, a moratorium on new development. As noted above, the existence of ancient woodland, registered Common Land and topography, severely constrains development of this lower grade land and therefore should not be considered as a suitable and viable alternative to the proposed allocation of land at Bridgend College.
24. The loss of BMV land at the proposed allocation site is clearly justified on the grounds for the need for the site to be developed for the provision of new homes in the Pencoed Sustainable Growth Area (i.e. there is overriding need. Furthermore, are no previously developed sites available in Pencoed which could facilitate the same level of growth envisaged and it has been demonstrated that there is no available and suitable land in lower agricultural grades as an alternative, and thus can be allocated in the Deposit LDP in accordance with paragraph 3.55 of PPW10.