

Agricultural Land Classification: Supplementary Note

September 2020

Purpose of this Note & Background

1. This note has been prepared by Savills on behalf of HD Ltd as part of the promotion of its land at Island Farm with regard to Agricultural Land Classification (ALC) matters.
2. ALC provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. It is the only approved system for grading agricultural land quality in England and Wales and is set out in the Welsh Office Agriculture Department 1988 guidelines and criteria for grading the quality of agricultural land (1988), and is supported by the Predictive ALC Maps provided on the Welsh Government's geo-portal, Lle.
3. Agricultural land in England and Wales is graded between 1 and 5, depending on the extent to which physical or chemical characteristics impose long-term limitations on agricultural use.
4. Best and most versatile (BMV) agricultural land is defined as Grades 1, 2 and 3a Planning Policy Wales (PPW) (Edition 10, December 2018) stating that the plan making and decision making process should give "considerable weight" to protecting BMV. There is 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:

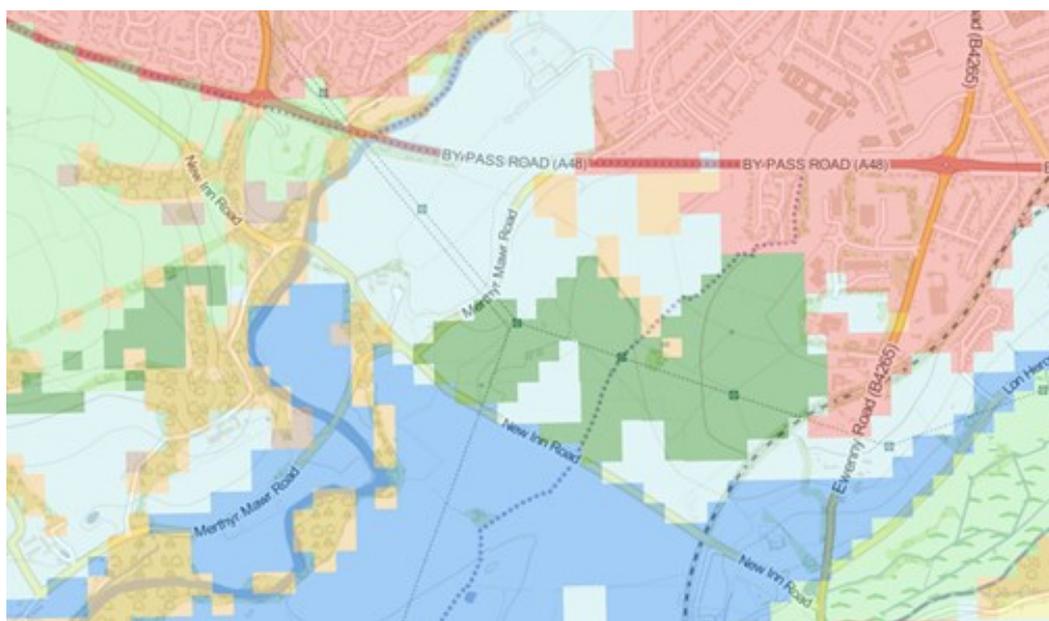
"Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations."
5. However, in this instance, it is important to reiterate that the planning status of the site, which as set out below indicates that a significant proportion of the land at Island Farm is subject an extant planning permission for development, the requirement for the proposed allocation of land in the LDP does not need to re-visit the tests set out in Paragraph 3.55 of PPW. Therefore, the case that is made elsewhere in the LDP submissions to set out the overriding need for development is not repeated in this document.

ALC of Land at Island Farm

Predictive Agricultural Land Classification Map

6. Whilst detailed survey work has not been undertaken for all land in Wales, Welsh Government prepare and maintain maps which predict the agricultural land quality, the most recent version of which was released in 2020, the first major update since the launching of the interactive maps in 2017. Welsh Government Guidance is clear that this information is for indicative purposes and does not replace the need for a formal survey.
7. The Predictive Agricultural Land Classification map for is the Site replicated below.

Figure 1: Predictive Agricultural Land Classification Map (source: Lle)



8. The Predictive Agricultural Land Classification Maps shows that the site is a mix of Grade 2 (light blue), Grade 3a (dark green) and non-agricultural (amber).

Previous ALC Survey

9. An Agricultural Land Classification survey was prepared by The Andersons Centre in August 2009 as part of the outline application for the sports village at the Island Farm site.
10. The Survey found that the site is a mix of Grade 2 (6.5ha) and Grade 3a (19.5ha), making the following comments:
 - The quality of soil was limited by the amount of stone and gravel;
 - Hedgerows onsite split the site into smaller parcels and shaded areas of crops;
 - The site was marginal in terms of profitability due to declining margins for cereal growing; and
 - The site is farmed as part of a much larger commercial farm and therefore its development would not prejudice the continuation of the established business.
11. During the determination of planning application for the sports village proposals, the decision maker (BCBC) acknowledged that the site's previous planning history had established the principle of the loss of areas of BMV on the site whilst also recognising the wider social and economic benefits that the scheme would deliver.

Summary

12. The Predictive Agricultural Land Classification Maps show the Island Farm site as containing a mix of Grade 2 and Grade 3a land which broadly reflects Agricultural Land Classification survey previously undertaken by The Andersons Centre to accompany the outline application for the sports village on the site. There is not expected to have been any changes to this since the survey was undertaken. Therefore, other than non-agricultural uses on the site, land is considered BMV land and thus the tests in paragraph 3.55 of PPW 10 is relevant.
13. That said, the previous ALC Survey found that the ability for the site to be productively farmed was limited by the stoniness of the soil and the large number of hedgerows, whilst declining

revenue from cereal production and the site forming part of a larger farmstead meant that the ceasing of cultivation would have limited economic impact.

Planning History and Extant Planning Permissions on the Site

14. Notwithstanding the previous survey work and the Predictive ALC Maps, planning history associated with the site has established the principle of the irreversible loss of BMV land on the site.
15. The outline permission for mixed use development, including sport, leisure, commercial and office uses (reference P/08/114/OUT), as well as subsequent reserved matters permissions, have been implemented which represent a highly material fall-back position – as explained in detail below.

Table 1: Extant Planning Permissions pertinent to the Site

| Application Reference | Description of Development | Implemented? |
|-----------------------|--|--|
| P/14/354/RES | Reserved Matters approval for a tennis centre development at Island Farm | Yes – enabling works and earthworks carried out |
| P/14/824/RES | Reserved Matters approval for highway infrastructure, green bridge and drainage infrastructure | Yes – enabling works carried out |
| P/14/823/RES | Reserved Matters approval for site wide soft landscaping and ecological mitigation | Yes, including construction of bat roost and extensive new landscaping works |

16. A Record of Works (dated 25 May 2017), relative to each of the above permissions, was provided to confirm and record that the permitted development detailed above has been lawfully commenced. This was confirmed to BCBC Officers at the time that the work took place, in Spring 2017 and the submitted information can be made available to BCBC LDP if required. However, it is well evidenced that, if desired by HD Ltd, it could be possible for development of the approved tennis centre and significant infrastructure works could legally continue under the extant planning permissions.
17. It is also notable that a proportion of the site (11ha) is also allocated as a Strategic Employment Site in the current LDP, reiterating the fact that BCBC has already accepted the loss of BMV land at this site for some time.
18. As such, this is a highly important and legally robust fall back position whereby a significant proportion of BMV land would be used for development through the potential to continue to implement the extant planning permissions on the site.

Conclusion

19. It is recognised that a large part of the site is considered BMV land, and ordinarily, would be subject to consideration against the tests set out in paragraph 3.55 of PPW. However, as set out above, BCBC has already accepted the loss of this BMV land through its considerable and long planning history, which includes a robust legal position whereby a considerable part of the site is subject to an extant planning permission which has been lawfully implemented, and could continue to should HD Ltd intent to.

20. Notwithstanding the extant planning permission, it remains the case with the new mix of uses proposed on the site, that there is an overriding need for the development and for the Replacement LDP to identify suitable, sustainable and deliverable sites for housing and education uses by virtue of site specific allocations.