Appendix C - Agricultural Land Classification Assessment

1. Background

C.1.1 The Pembrokeshire Coast National Park Authority Local Development Plan (LDP) was adopted in September 2010. Following adoption, the Authority has a duty to ensure that the Local Development Plan remains fit for purpose. The Pembrokeshire Coast National Park Authority prepared a draft replacement Preferred Strategy in May 2017. The Preferred Strategy includes a list of Candidate Sites that are considered to comply with the Strategy and be suitable in principle for allocation. The Authority are currently assessing the suitability of these sites in more detail, to determine their suitability for inclusion as allocations for development. Part of the assessment includes consideration of the quality of the land, some of which is agricultural. This appendix presents an assessment of the potential loss of 'best and most versatile' agricultural land, should the candidate sites under consideration be developed.

C.1.2 Agricultural Land Classification (ALC) is covered in the 'Planning for Sustainability' section of Planning Policy Wales (PPW) Edition 9, November 2016 (Welsh Government (WG)). Section 4.10 on conserving the 'best and most versatile' agricultural land states that '*land of grades 1, 2 and 3a of the Department for Environment, Food and Rural Affairs (DEFRA) Agricultural Land Classification system (ALC) is the best and most versatile, and should be conserved as a finite resource for the future'.*

C.1.3 PPW goes on to require that 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 lower grade land has an environmental value recognised by landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations.

2. Methodology

C.2.1 To begin with, a site visit and desk-based assessment was undertaken for each of the 27 selected candidate sites.

C.2.2 As part of the desk-based assessment, in order to calculate the impact on high quality agricultural land, the red line boundary for each site was plotted against the ALC grade, and the site area(ha) was determined by ALC grade. The mapping exercise used Quantum Geographical Information System (QGIS)[1] (a system application that supports viewing, editing and analysing geospatial data), which enabled us to overlay the agricultural land classification shape files over the existing site boundaries. Where a site consisted of two or more grades, the software enabled a calculation to be made to determine separate site areas.

C.2.3 For the purposes of the assessment it is important to distinguish between the sub grades 3a and 3b, as only land of grades '1, 2 and 3a' is considered to be 'best

[1] QGIS Agricultural Land Classification Maps http://www.qgis.org/en/site/

and most versatile'. However, current finalised data sets do not make this distinction. The ALC data was therefore sourced from the emerging Welsh Government, Department for Environment and Rural Affairs' (Defra) *Draft Predictive Agricultural Land Classification Map for Wales (2017)*[2]. It is noted that the Draft Predictive ALC Map is still under development by the Defra. ALC grades may be subject to change on formal release and in further updates, as better data becomes available. The mapping provides a predicted ALC grade for each of the candidate sites; a definitive grade can only be given by commissioning an ALC survey in accordance with the 1988 MAFF Guidelines. The timeline for development and release of further information from WG and Defra is as follows:

- April 2016 – March 2017: Map Development.
- April 2017 – September 2017: Targeted Survey Validation Programme.
- October 2017 – November 2017: Map Refinement based on Validation Programme.
- November 2017 – February 2018: Release of Predictive ALC Map with guidance and withdrawal of Provisional ALC Map.
- Annual Updates as data behind the map is refined.

C.2.4 The draft indicative breakdown of grades of agricultural land for Wales as a whole is as follows:

- Grade 1 1%
- Grade 2 5%
- Grade 3a 8%
- Grade 3b 24%
- Grade 4 20%
- Grade 5 23%

C.2.5 The total agricultural land area for Wales is 1,842.9 thousand hectares. Therefore, the total amount of BMV land (grades 1-3a) in Wales is provisionally estimated as 258 thousand hectares.

3. Assessment

C.3.1 Table 1 presents each of the candidate sites accompanied by site addresses, agricultural land classification grade and site area (ha). The figures can be viewed in the context of the total agricultural land in Pembrokeshire County, which is presented in Table 2.

C.3.2 It is noted that the 'developable area' used for the Land Implementation Study i.e. that used in the DAT and presented in the site maps (Appendix B), may differ from the 'whole site' area (as reflected in the map book and used for the ALC calculations). The 'whole site' area was used to calculate the potential loss of ALC

[2] Agricultural Land Classification: http://gov.wales/topics/environmentcountryside/farmingandcountryside/agricultural-land-classification/?lang=en

land, as it was determined that, should the site be developed, that the remaining land would not be able to be used for agricultural purposes. It is also noted that there are some anomalies in the data, arising from its strategic nature. For example, some of the sites showing as having an ALC grade are either entirely or largely brownfield. These are noted in the assessment below and greyed out in the table. These have also been excluded from the main calculations.

Table 1 – Candidate Site Agricultural Land Classifications

Site Reference	Site name	Agricultural Land Classification Grade	Site Area (ha)/ Amount of land lost	% of site
013A 135A	Land to the Rear/West of Spring Hill	5	0.37	100
014A	Glasfryn Field, Square and Compass	3a	0.26	100
015	Land at Sandy Hill, Saundersfoot	3a	2.26	100
031	North of Whitlow, Saundersfoot	3a	4.82	82
		3b	1.07	18
099A 021A	Land West of Glasfryn Road	2	0.76	23
		4	2.59	77
034	Land off Trewarren Road, St Ishmaels	2	0.83	44
		3a	1.04	56
036	Penny Farm, Site A, Saundersfoot	3a	0.38	100
037	Penny Farm, Site B, Saundersfoot	3a	0.75	
039	South-East of Site 041, Broad Haven	3a	0.17	18
		3b	0.75	82
041		2	0.002	1
		3a	1.78	80
		3b	0.43	19
045	Lawrenny Home Farm	3a	1.92	100
050	Land off Heol	3a	0.35	100

Site Reference	Site name	Agricultural Land Classification Grade	Site Area (ha)/ Amount of land lost	% of site
	Crwys, Trefin			
054	Land to rear of Angorfan Bungalow and Dinas Cross Service Station, Dinas Cross	5	0.2	100
056	West of Narberth Road, Tenby	3a	0.42	38
061	Parc y Plant, Newport	3b	0.34	100
068 088A 089A 090A	Land North of Newport Business Park, Newport	3b	0.5	100
086A	West of the Green, Lydstep	3a	0.4	100
096A	Cippin Stone, Newport	3b	1.46	100
106	Land adjacent Bryngolau, Square and Compass	3a	0.33	100
112	Bryn Hir, Tenby	3a	4.37	100
113	Butts Field Car Park, Tenby	3a	0.61	73
		3b	0.19	23
		4	0.03	4
124	East of Tower Hill, Dinas Cross	3b	1.5	100

Site Reference	Site name	Agricultural Land Classification Grade	Site Area (ha)/ Amount of land lost	% of site
129	West of Rosebush, Rosebush	5	0.36	100
131/131A	North of Jason's Corner, Stackpole	3b	0.68	62
		3b	0.002	1
		4	0.17	48
136A	Land South of A487, South West of Castle Terrace, Dinas Cross	5	0.17	100
138	Buttylands, Manorbier	3a	0.6	100
151A	Land North West of Maes Ewan, Solva	3a	1.5	100
308	Land adjacent Temple House	3a	0.17	100

C.3.3 Table 1 shows that Site 031 is the largest site, at 5.9ha. 82% (4.82ha) of this site comprises 'best and most versatile' agricultural land (grade 3a). It is noted that site 045 (Lawrenny Home Farm) and site 113 (Butts Field Car Park, Tenby) are brownfield sites, although they appear on the draft ALC mapping. They have been removed from the assessments.

C.3.4 Table 2 shows the total area of agricultural land in Pembrokeshire by ALC grade. It shows that in total, 35,438 hectares are classified as 'best and most versatile' agricultural land. This equates to 21.7% of total agricultural land in Pembrokeshire.

Table 2 – Breakdown of Grades of Agricultural Land for Pembrokeshire as a whole

ALC Grade	Agricultural land in Pembrokeshire (ha)	%
1	211.06	0.1
2	19,579.87	12

3a	15,646.6	9.6
3b	23,303.54	14.3
4	44,997.69	27.5
5	59,601	36.5
TOTAL	163,339.76	100

C.3.5 Table 3 provides a breakdown of total site area/land lost by agricultural land classification grade. For each grade, a percentage is calculated showing the proportion of Pembrokeshire agricultural land lost were the sites to progress. It shows that in total, 21.37 hectares of land included within housing sites are classified as 'best and most versatile' agricultural land. There are no sites that fall within grade 1, which is the highest quality agricultural land, however there are four sites classed as grade 5 (129,136a,013a/135a and 54), which is very poor quality agricultural land. Land identified as Grade 2 agricultural land is included in sites 034, 099A, 021A, 041 and 131/131A, totalling 1.77 hectares.

Table 3 – Agricultural Land Classifications by Site Area within Pembrokeshire Coast National Park

ALC Grade	Site Area (ha)	% of land lost by grade.
1	N/A	N/A
2	1.77	6
3a	19.6	61
3b	6.73	20
4	2.76	9
5	1.25	4
	32.11	
TOTAL GRADE 1, 2 & 3a	**21.37**	

4. Conclusion

C.4.1 The method for allocating candidate sites has followed a sequential approach. The sequential approach, used in the candidate site assessment process, is likely to have limited the extent of agricultural land proposed for development, based on its relationship with other aspects of relevance, such as landscape considerations. As such, undertaking detailed ALC assessments, in line with the MAFF Guidelines (published in 1988), may not alter the impact on ALC land, as the candidate site assessment process would have already minimised the potential impact.

C.4.2 Article 10(1), paragraph (w) of the Table to the Town and Country Planning (General Development Procedure) Order 1995 (GDPO) (S.I .No 1995/419) states if

there is a loss of 20 hectares or more of grades 1, 2 or 3a agricultural land, or a loss which is less than 20 hectares but is likely to lead to further losses amounting cumulatively to 20 hectares or more, planning authorities are required to consult WG before granting planning permission which is not in accordance with the development plan. This provides a guideline for significance. This is not applicable to any of the individual sites under consideration.

C.4.3 Removing the 'best and most versatile' land grades 1-3a would mean a loss of over half of the candidate sites. However, it is considered that removing these sites would mean that the Authority may be unable to meet the need for affordable housing within the National Park. The candidate site assessment process has been subject to Sustainability Appraisal, which has filtered out the least sustainable candidate sites. Therefore, it is considered that there are unlikely to be further alternative sites that are considered to be more sustainable, compared to those under consideration. It is noted that the candidate sites are relatively small in scale, and would not be considered to be significant under WG guidelines considered above.

C.4.4 In order to enable sites to be developed more sustainably, mitigation measures may be appropriate to enable the development of these sites. Welsh Government's Code of Good Agricultural Practice outlines the importance of protecting and maintaining soil quality and preventing erosion and contamination. '*Soils are a finite and non-renewable resource and so it is essential that they be managed correctly'.* The need to retain soil quality needs to be addressed in any decision on agricultural land loss. The focus of the ALC system is on the ability of land to produce food, soils provide a wide range of other benefits (Ecosystem Services) which also need to be taken into account. Ensuring that, on each site, the soils are handled, stored and re-used carefully will enable the soil resource to continue to provide these benefits (such as supporting habitats, allowing infiltration and thus reducing flood risk etc.) and this should be a focus of permissions granted. DEFRA's Code of Construction Practice provides examples where the environmental requirements of a project and an Agricultural Management Plan (AMP) provide protection of soil quality driven by agricultural land quality and the desire to minimise the impact of the scheme on 'best and most versatile' land.

References

- DEFRA (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- HM Government (1995) The Town and Country Planning (General Development Procedure) Order 1995
- Ministry of Agriculture, Fisheries and Food (MAFF) (1988) Agricultural Land Classification of England and Wales
- Welsh Government (2011) Code of Good Agricultural Practice
- Welsh Government (2016) Policy Wales (PPW) Edition 9
- Welsh Government (2016) Technical Advice Note TAN6: Planning for Sustainable Rural Communities
- Welsh Government (2017) Department for Environment and Rural Affairs' Draft Predictive Agricultural Land Classification Map for Wales