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11 October 2023

Dear Matthew Phillips & Bethan Jones,

**Re: Planning Application Consultation Response - P/2023/0593 - Proposed development, land at Lower Berse Farm, Wrexham.**

I refer to your e-mail on the 21<sup>st</sup> of September 2023 consulting the Department on the above application. This response is made in accordance with:

- Schedule 4, paragraph (s) of the Town and Country Planning (Development Management Procedure)(Wales) Order 2012
- Annex B2 and B6 of Technical Advice Note (TAN) 6 – 2010<sup>1</sup>.
- Planning Policy Wales (PPW), Edition 11 – 2021<sup>2</sup>.
- National Development Framework (NDF) Future Wales: The National Plan 2040<sup>3</sup>

This response will first set out our consideration of the agricultural land classification survey undertaken for the site, followed by our substantive response on the proposed application.

**1. Agricultural Land Classification (ALC) survey - Technical Review:**

An Agricultural Land Classification report has been prepared by ADAS (*Ref: 1010760 Ruthin Road, Wrexham – Agricultural Land Classification, dated 7<sup>th</sup> September 2021*) and is included with the application documents<sup>4</sup>.

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<sup>1</sup> <https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities>

<sup>2</sup> [https://www.gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11\\_0.pdf](https://www.gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf)

<sup>3</sup> <https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf>

<sup>4</sup> [Environmental Statement – Appendix 10.3](#)

The Department has previously undertaken a validation of the ALC survey report and can confirm it has been undertaken in accordance with the 'Revised Guidelines and Criteria for Grading the Quality of Agricultural Land' (MAFF 1988)<sup>5</sup>. The ALC report confirms the application area agricultural land quality to be:

| Grade              | Area (ha)     | Area %     |
|--------------------|---------------|------------|
| Grade 1            | 3.4           | 4          |
| Grade 2            | 21.9          | 29         |
| Subgrade 3a        | 36.3          | 48         |
| Subgrade 3b        | 6.1           | 8          |
| Grade 4            | 1.6           | 2          |
| Grade 5            | -             | 0          |
| Urban              | -             | 0          |
| 'non-agricultural' | 6.8           | 9          |
| <b>TOTAL</b>       | <b>76.1ha</b> | <b>100</b> |

## 2. Agricultural Land Classification (ALC) – Advice:

The ALC survey report by ADAS (Ref: 1010760 Ruthin Road, Wrexham – Agricultural Land Classification, dated 7<sup>th</sup> September 2021) can be accepted by your Authority as an accurate reflection of the land quality on site. **This confirms the presence of 61.6ha (81% of site) of Best and Most Versatile (BMV) agricultural land** as defined in Planning Policy Wales (PPW) 11, paragraph 3.58.

## 3. Expression of view:

Having considered this proposal in light of Welsh Government Planning Policy Wales provision for the protection of BMV agricultural land (paragraphs 3.58 & 3.59); TAN 6 (Annex B1 & B2) and Future Wales (Policy 9), the Department offers **no** objection to the application for the following reasons:

- A re-appraisal of the status of the emerging LDP where the principle of the BMV loss in this specific case has been agreed by the Inspector, and as accepted for the whole Plan by the Department in representations dated 12 July 2018.
- The status of Future Wales as a material consideration in relation to the elapsed UDP.

The view expressed does not bind any other part of Welsh Government commenting on the proposal. I trust the above expression of view and associated remarks are clear and unambiguous. Please do not hesitate to contact LQAS if necessary.

Yours sincerely



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<sup>5</sup><https://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736>