



Mared Rees-Jones
Planning and Regulatory
Wrexham County Borough Council
Guildhall
Wrexham
LL11 1AY

27 August 2020

Dear Mared Rees-Jones,

RE: Planning Application – P/2020/0363 - Consultation on the Sequential Test Report

I refer to your letter of 24 August, consulting the Department for Environment, Energy & Rural Affairs on the Sequential Test Report dated August 2020.

Sequential Test Report:

The Department does not agree with the following arguments made in the Report:

1. The Department does not accept the BMV lost to be 22.5ha, *“The remainder of the site would remain untouched and conserve the best and most versatile Grade 3a land as a finite resource for the future”*. Change of use / red line boundary is 44ha and represents permanent BMV agricultural land loss.
2. The Department does not accept, *“there is an overwhelming need for the land at Five Fords to be converted from its current maize crop to fresh produce horticultural production.”* It is an agricultural practices matter and a false argument.
3. The productive output whilst impressive, does not override the BMV status of the land.
4. Access as a limitation for site 6.
5. Criterion 5
6. The traffic light analysis in Table 1 concerning land quality (referenced as soil quality).

The Department does accept the following arguments:

1. The policy case for the development
2. The locational need in terms of:
 - a. The assessment of *1,800 treatment works across the UK... and the Five Fords WwTW was shown to be in the top 20 in regard to both flow rate and basic planning suitability.*
 - b. Proximity to the WwTW
 - c. Proximity to electricity networks
 - d. Flood risk
 - e. Topography

Expression of View:

Having considered this proposal in light of the Sequential Test Report and Welsh Government Planning Policy Wales towards the protection of BMV agricultural land (paragraphs 3.54 & 3.55), the Department for Environment, Energy & Rural Affairs **withdraws** its objection of 12 August.

The view expressed does not bind any other part of Welsh Government commenting on the proposal.

Yours sincerely

A handwritten signature in black ink, appearing to read 'RJ Cooke', with a stylized flourish at the end.

RJ Cooke
Senior Adviser
Soil Policy & Agricultural Land Use Planning Unit