

AnnS Jones

From: Matthew Phillips
Sent: 28 March 2019 14:17
To: planning_admin
Subject: FW: Agricultural Land Classification - Land at Woodlands Farm Dodds Lane P/2018/0997

General consultation response

From: Arwel.Williams@gov.wales [mailto:Arwel.Williams@gov.wales]
Sent: 28 March 2019 14:16
To: Matthew Phillips
Cc: James.Cooke@gov.wales
Subject: RE: Agricultural Land Classification - Land at Woodlands Farm Dodds Lane P/2018/0997

Dear Matthew Phillips,

(James – for information as discussed)

Re: Planning Application – Land at Woodlands Farm, Dodds Lane, Gwersyllt, Wrexham (P/2018/0997) – Agricultural Land Classification (ALC) Report.

Thank you for consulting us on the Agricultural Land Classification Report (*Ref: 1367/1b – 6th November 2017, by L. Thomas, Land Research Associates Ltd.*) submitted by the proposer of the above site. This response is made in accordance with TAN6, Annex B6 and relates to technical information only; not the merits or otherwise of the proposal.

1. ALC Information

The Department confirms the survey by Land Research Associates Ltd. (*Ref: 1367/1b – 6th November 2017*) has been completed in accordance with the *Revised Guidelines and Criteria for Grading the Quality of Agricultural Land* (MAFF 1988). The survey presents a fair and accurate representation of land quality on the site (ALC Subgrade 3a and 3b). The survey confirms the presence of 1.13ha of BMV Agricultural Land on the site.

For information, see below a description of the ALC grades/subgrades as noted in the *Revised Guidelines and Criteria for Grading the Quality of Agricultural Land* (MAFF 1988).

- **Grade 3 - good to moderate quality agricultural land**

Land with moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in Grades 1 and 2.

- **Subgrade 3a - good quality agricultural land**

Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops.

- **Subgrade 3b - moderate quality agricultural land**

Land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year.

Paragraph 3.5 and 3.6 of the ALC Report:

These paragraphs provide a summary or interpretation of the raw soil data and how it was applied to the final grade assessed across the site. The limitations given demonstrate that the land is not Grade 1 or 2 but instead within the 3a set of criteria. Only the final grade is important for your Authority in applying BMV policy.

2. Planning Statement

Paragraphs 3.7.1, 3.7.2 & 4.3.16 provide technical information not policy interpretation. Whilst it is not within the remit of the Department to comment on the merits of the application, it views the technical interpretation of the ALC grades in the Planning Statement as incorrect.

3.7.2 – “...however this land is limited by wetness as a high clay content of the topsoil and dense lower soil would restrict access for farm machinery during wet periods and therefore limit land flexibility.” These limitations have been assessed in the ALC report and found to be within the ALC Grade 3a criteria range of acceptability. If these limitations were of such severity to significantly limit cropping flexibility, the site would have been placed into a lower ALC grade. It is clear the Surveyor found the land to be ALC Grade 3a and therefore within the BMV category; this is not in question.

4.3.16 “Whilst much of the site is graded as 3a land the gradient of the Site would restrict the safe, efficient and practical use of the Site for agricultural purposes and the site is therefore of limited value from an agricultural perspective.” This is incorrect. Only the Grade 3b is limited by gradient. There is no gradient limitation on the Grade 3a area so this statement is misleading and incorrect.

High quality BMV land has been identified on the site and the technical arguments presented in these paragraphs are invalid. These paragraphs do not represent a policy argument.

3. Advice

The Department recommends that the ALC report should be accepted by your Authority.

As this application is a departure case, the Department expects the BMV Policy (PPW paragraphs 3.54 and 3.55) and sequential test to be applied in this case.

I would be pleased to discuss should you have any questions.

Kind regards

Arwel Williams

Arwel Wyn Williams
Cynghorydd Polisi Pridd a Defnydd Tir Amaethyddol / Agricultural Land Use & Soil Policy Advisor
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From: Matthew Phillips <Matthew.Phillips@wrexham.gov.uk>
Sent: 28 March 2019 13:57
To: Williams, Arwel (ESNR - ERA - Land, Nature & Forestry) <Arwel.Williams@gov.wales>; Cooke, James (ESNR - ERA - Land, Nature & Forestry) <James.Cooke@gov.wales>
Subject: FW: Agricultural Land Classification - Land at Woodlands Farm Dodds Lane P/2018/0997

Both,

Sorry to chase on this, just wondered if you had been able to have a look at this?

Regards

Matthew Phillips
Planning Control Lead/Arweinydd Rheoli Cynllunio
Environment and Planning/Amgylchedd a Chynllunio
Wrexham County Borough Council/Cyngor Bwrdeistref Sirol Wrecsam
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From: Matthew Phillips
Sent: 11 March 2019 13:19
To: 'Arwel.Williams@gov.wales'; 'James.Cooke@gov.wales'
Subject: Agricultural Land Classification - Land at Woodlands Farm Dodds Lane P/2018/0997

Both,

I am dealing with an application for 23 houses at the above site – plan attached. The grid reference for the site is E332329 N353230.

The site appears to contain Grade 2 land on the Predicative ALC map. The applicants have commissioned their own survey of the site (also attached). This suggests the majority of the site is Grade 3a land. From a policy perspective this report does therefore not make a huge difference given that it confirms the presence of BMV land.

I would however appreciate your views on the report as well as, if possible the comments made in paragraph 3.5 and 3.6 in respect of the utility of the Grade 3a land.

Regards

Matthew Phillips
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