

VALE OF GLAMORGAN

REPLACEMENT LOCAL DEVELOPMENT PLAN
2021 - 2036

BEST AND MOST VERSATILE AGRICULTURAL LAND

October 2023



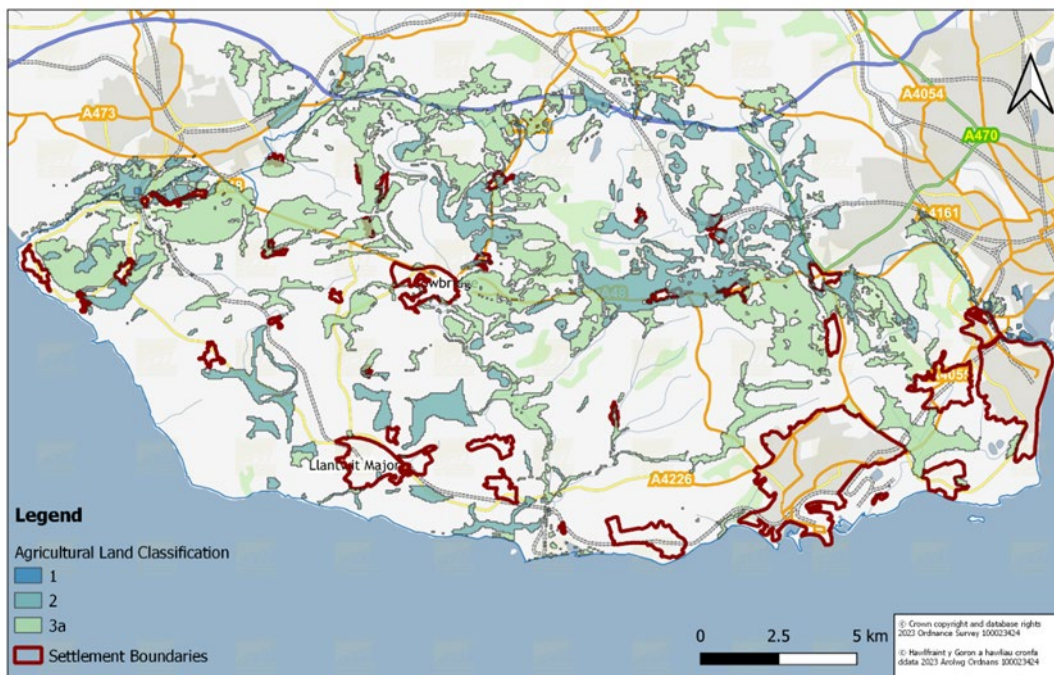
BACKGROUND PAPER - BP23



Executive Summary

- i. The purpose of this paper is to set out how the Vale of Glamorgan Council has considered the location and quality of agricultural land in developing the Vale of Glamorgan Replacement Local Development Plan 2021-2036 (RLDP). It explains how the Council through its assessment of candidate sites has considered the need to minimise the loss of the Best and Most Versatile agricultural land (BMV) as required by national planning policy.

Best and Most Versatile Agricultural Land



- ii. The latest Predictive ALC Map for Wales (Version 2), published in 2019, shows that there is only a small area of Grade 1 land (Excellent Quality Agricultural Land) within the Vale (in north Penarth), but a significant part of the local authority area is subject to Grade 2 (Very Good Quality Agricultural Land) or 3a (Good Quality Agricultural Land) designations.
- iii. National Policy emphasises that the location and quality of agricultural land is a fundamental supply factor that should inform the spatial distribution of growth. Planning Policy Wales (PPW) states that agricultural land classified as Grades 1, 2 and 3a (by the Agricultural Land Classification (ALC) system) is considered “the best and most versatile and should be conserved as a finite resource for the future” (WG, 2021, para 3.58).
- iv. As part of the RLDP Preferred Strategy preparation, careful consideration has been given to the Plan’s potential impact on BMV agricultural land, notably through the assessment of Candidate Site Submissions.

- v. To assess the potential loss of BMV land the Council utilised the latest Predictive ALC Map for Wales, and promoters of sites were also advised to utilise these maps prior to the submission of sites to the Council. Sites were scored according to their designation.

Agricultural Land	Green	The site is previously developed land or would not result in the loss of Best and Most Versatile Agricultural Land
	Amber	The site would result in loss of grade 3a BMV land
	Red	The site would result in a loss of the either Grade 1 or 2 agricultural land

- vi. Sites have been ruled out where BMV is identified as a significant constraint to development.
- vii. Overall, two of the key sites have been identified as including areas of BMV land:
- Land at North East Barry (6.84 Ha of Grade 3a land– less than 10% of the overall site area). An ALC Survey will be required to determine the quality of the land.
 - Land at Church Farm (1.5 Ha of Grade 2/3a land – less than 10% of the overall site area). An ALC survey has identified *“that the site is predominately Subgrade 3b, with 1.5 ha in the south-eastern parcel showing as Grade 2, and a small area of Subgrade 3a. The ALC survey indicates that due to the site primarily subgrade 3b the area potentially identified as being grade 2 could not in any meaningful way be farmed differently and so would not be capable of being exploited as BMV.”*
- viii. BMV land has also been identified on two sites that are considered suitable for further consideration as affordable housing led sites. ALC surveys will be required on these sites.
- ix. Several sites proposed to be rolled forward from the adopted LDP include areas of BMV land and the Welsh Government’s previous comments on these sites is listed in Appendix 1.

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1. Introduction

- 1.1 The purpose of this paper is to set out how the Vale of Glamorgan Council has considered the location and quality of agricultural land in developing the Vale of Glamorgan Replacement Local Development Plan 2021-2036 (RLDP). It explains how the Council through its assessment of candidate sites has considered the need to minimise the loss of the Best and Most Versatile agricultural land (BMV) as required by national planning policy.

Best and Most Versatile Agricultural Land

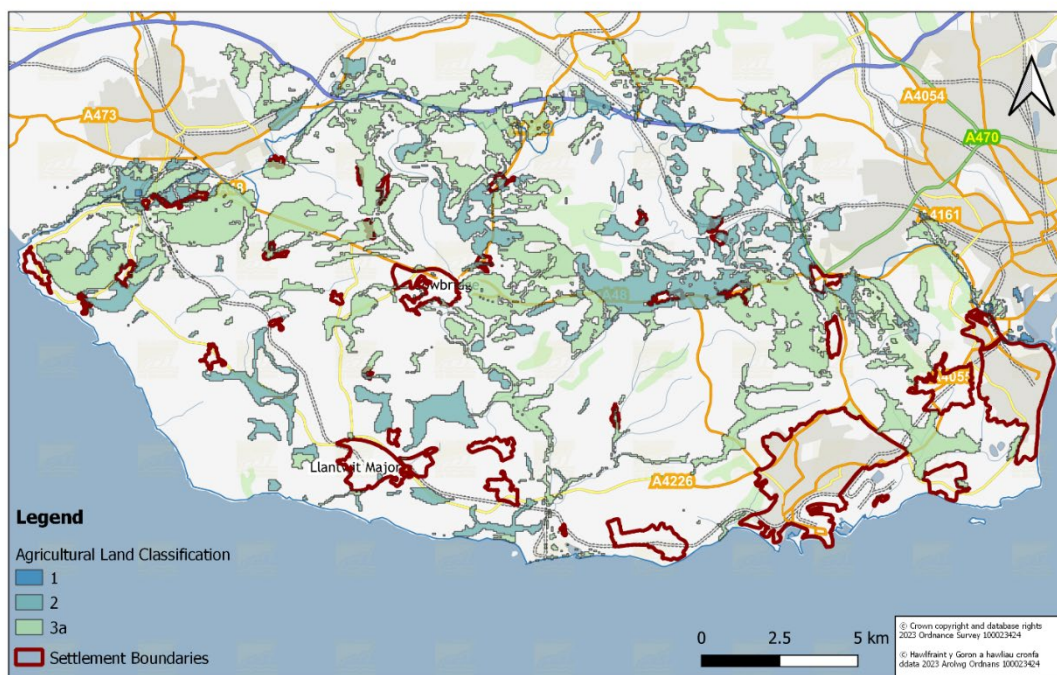


Figure 1: Best and Most Versatile Land – Grades 1, 2 and 3a

- 1.2 The latest Predictive ALC Map for Wales (Version 2), published in 2019, shows that there is only a small area of Grade 1 land (Excellent Quality Agricultural Land) within the Vale (in north Penarth), but a significant part of the local authority area is subject to Grade 2 (Very Good Quality Agricultural Land) or 3a (Good Quality Agricultural Land) designations.

2. National Planning Policy

- 2.1 National Policy emphasises that the location and quality of agricultural land is a fundamental supply factor that should inform the spatial distribution of growth. Planning Policy Wales (PPW) states that agricultural land classified as Grades 1, 2 and 3a (by the Agricultural Land Classification (ALC) system) is considered “*the best and most versatile and should be conserved as a finite resource for the future*” (WG, 2021, para 3.58).

- 2.2 When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. 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. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade (WG, 2021, para 3.59).
- 2.3 Technical Advice Note (TAN) 6 also states, “*when preparing development plans and considering planning applications, planning authorities should consider the quality of agricultural land and other agricultural factors and seek to minimise any adverse effects on the environment*” (WG, 2010, para. 6.2). The TAN also references the Agricultural Land Classification (ALC) map in terms of use in strategic planning.
- 2.4 A new Predictive ALC Map for Wales (Version 2) was released in December 2019, which uses the best available information to predict the agricultural grade of land on a national basis and includes detailed soil series data and an updated ALC survey layer.

3. Consideration of BMV Agricultural Land in RLDP Preferred Strategy

- 3.1 As part of the RLDP Preferred Strategy preparation, careful consideration has been given to the Plan’s potential impact on BMV agricultural land, notably through the assessment of Candidate Site Submissions.
- 3.2 Between the 17th of June and 13th September 2022, the Council invited site promoters to submit sites for consideration by the Council, with an additional 3-month period thereafter to enable site promoters to submit any relevant supporting information. During this period 148 sites were submitted for a range of uses including housing, employment, renewable energy, minerals, and open space.
- 3.3 All sites submitted, were assessed in accordance with the Candidate Site Assessment Methodology, which was published on the Council’s website and made available to all site promoters. The Preferred Strategy Candidate Site Assessment Background Paper provides information on the progress of candidate sites through this assessment process. Evidence in respect of the selection process for housing sites included in the Vale of Glamorgan Preferred Strategy is contained within this report and provides a summary justification for the exclusion or progression of sites.

- 3.4 Sites submitted for non-residential developments such as employment and retail uses have been considered within the context of background studies undertaken by the Council to determine the need for additional sites within the Preferred Strategy. Details of these sites are set out in the site assessment background paper.
- 3.5 Information on each site was augmented as a site progressed through the stages of the approved methodology and agricultural land value/classification was one of many site aspects taken into consideration by the Council in its identification of potential development sites and this is reflected in the findings report.

4. Site Assessments

- 4.1 Stage 2 of the site assessment includes consideration of agricultural land quality and the potential loss of BMV Agricultural Land, with the impact of the loss measured by a traffic light system, with greater negative weightings given to the loss of Grades 1 and 2 land, then Grade 3a over lower grades as illustrated below:

Agricultural Land	Green	The site is previously developed land or would not result in the loss of Best and Most Versatile Agricultural Land
	Amber	The site would result in loss of grade 3a BMV land
	Red	The site would result in a loss of the either Grade 1 or 2 agricultural land

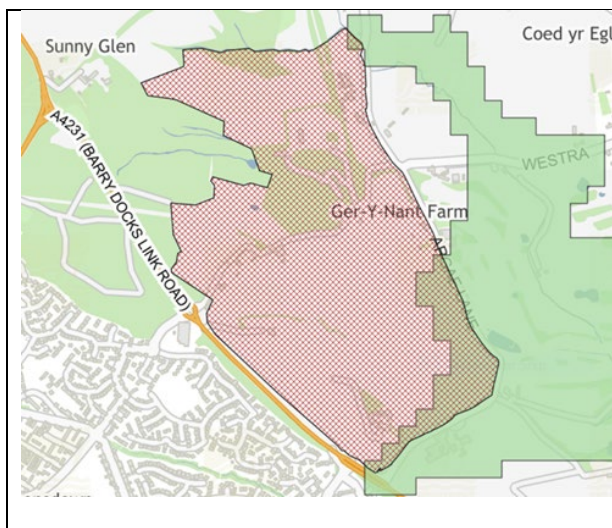
- 4.2 To assess the potential loss of BMV land the Council utilised the latest Predictive ALC Map for Wales (December 2019), and promoters of sites were also advised to utilise these maps prior to the submission of sites to the Council.
- 4.3 The Welsh Government Guidance Note v2.1 (May 2021)¹ that accompanies the ALC Maps describes the purpose of the Predictive Map. The Guidance Note identifies that where land is shown on the predictive ALC as likely falling within Grades 1, 2 or 3a of the ALC, field surveys will be required. The Survey Decision Flowchart in the Guidance Note shows that, where land is shown on the Predictive Map as Grades 3b, 4 and 5 then “Survey Not Required”.
- 4.4 Accordingly, site promoters were advised to undertake detailed site surveys to verify the loss of BMV where present on the ALC maps, resulting in a number of ALC studies being submitted to the Council. Also, the Council’s site methodology indicates that site promoters will be required to submit an ALC

¹ <https://www.gov.wales/sites/default/files/publications/2021-05/agricultural-land-classification-predictive-map-guidance.pdf>

survey where the Predictive Agricultural Land Classification Map identifies grades 1, 2 or 3a, to determine the grade and proportion.

- 4.5 Through the assessment the Council identified sites where BMV was indicated on the ALC maps. Where the maps indicated that BMV land was of a significant scale to affect a significant part of an overall site, the site was excluded from further consideration. Where ALC surveys were submitted, the Council considered these in determining whether a site was progressed to the next stage of assessment. Further details of the Stage 2 assessments are set out in the Council's Preferred Strategy Candidate Site Assessment Background Paper.
- 4.6 Following the assessment of sites of initial viability evidence sites (Stage 3) were considered in relation to their compatibility with the RLDP Preferred Strategy. This resulted in the identification of Key Housing allocations as detailed within the Preferred Strategy, and a shortlist of potential small affordable housing led housing schemes. The list of sites also included existing adopted LDP sites rolled forward. The shortlisted sites are set out in the Council's Preferred Strategy Candidate Site Assessment Background Paper.
- 4.7 The table below provides a list of the key and small affordable housing sites that the Predictive ALC Map for Wales identify as having an element of BMV Grades 1,2 and 3a within the identified site boundary. The table reproduces the predictive map layer associated with the site and identifies the area of potential BMV land affected. Where a ALC survey has been provided a summary of the study has also been provided.

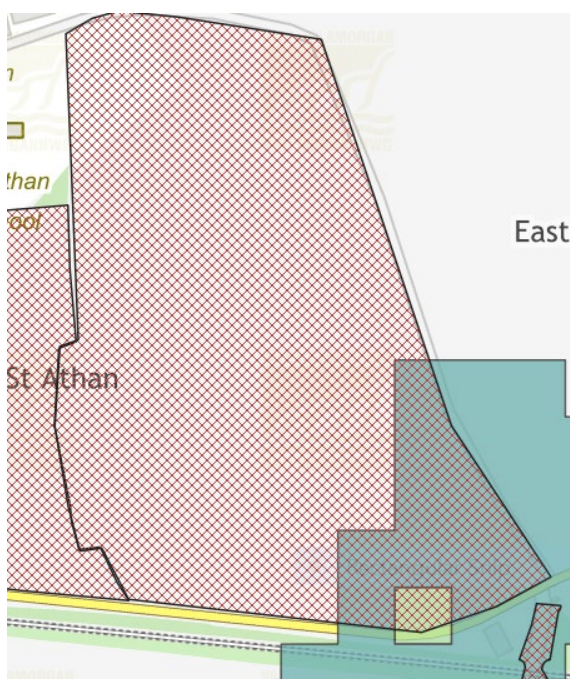
Site ID	Site Name	BMV Present	Total Site Area	Area of BMV Land
428	Land North East Barry	NRW Predictive Agricultural Land Classification Map identifies the presence of Grade 3a land within boundary (see map).	70 hectares	6.84 ha - actual area and presence of BMV to be determined following a ALC survey
Commentary				



Land at North East Barry is identified as a Key Housing Allocation within the RLDP. The site promoters are currently undertaking a ALC study to verify the extent of grade 3a land identified on the Predictive ALC map. Initial mapping indicates that approximately 6.84 hectares of land maybe Grade 3a BMV, which equates to 9.8% of the total site area.

Site ID	Site Name	BMV Present	Total Site Area	Area of BMV Land
485	Land adjacent to Church Farm	Predictive Agricultural Land Classification Map identifies the presence of Grade 2 and 3a land to within the boundary (see map)	16 hectares	1.5 hectares

Commentary



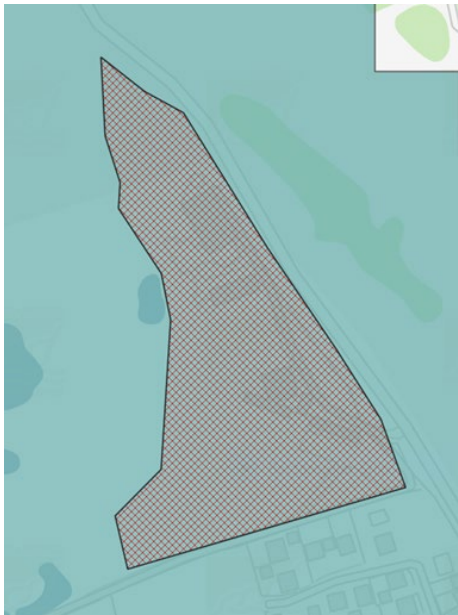
Consideration of the loss of grades 2 and 3a agricultural land has been undertaken by the site promoter. An Agricultural Land Quality Assessment has been undertaken by the site promoters. The assessment indicates that the site is predominately Subgrade 3b, with 1.5 ha in the south-eastern parcel showing as Grade 2, and a small area of Subgrade 3a. The ALC survey indicates that due to the site primarily subgrade 3b the area potentially identified as being grade 2 could not in any meaningful way be farmed differently and so would not be capable of being exploited as BMV.

The Institute of Environmental Management and Assessment (IEMA) guide “A New Perspective on Land and Soil in Environmental Impact Assessment” (February 2022) identifies losses of under 5 ha as “minor magnitude” development. The quantity of Grade 2 and 3a land on the site is 1.5 ha. Therefore, should the Grade 2 and 3a exist, this is about 30% of the threshold of what constitutes “minor” development and accordingly is at the lower end of the scale.

Site ID	Site Name	BMV Present	Total Site Area	Area of BMV Land
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417	The Old Dairy Site, Bonvilston	Predictive Agricultural Land Classification Map identifies the presence of Grade 2 land to within the boundary (see map)	2.6 hectares	2.6 hectares - actual area and presence of BMV to be determined following a ALC survey
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Commentary

	<p>The site is shortlisted as a potential affordable housing led site located within a minor rural settlement and would accord with the RLDP strategy and the delivery of affordable housing. It is noted that the site currently contains several vacant and dilapidated agricultural structures, and as such the site could be considered as being previously developed land.</p> <p>In line with the Council's site assessment methodology an Agricultural Land Quality Assessment will be required to verify the presence and amount of BMV land within the site. The Council shall also require an updated viability appraisal of the site to determine if the site will support a minimum 50% affordable housing in accordance with the RLDP growth strategy.</p>
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Site ID	Site Name	BMV Present	Total Site Area	Area of BMV Land
464	Land opposite the St David's Church in Wales Primary School, Colwinston	Predictive Agricultural Land Classification Map identifies the presence of Grade 3a land to within the boundary (see map)	1.38 ha	1.28ha - actual area and presence of BMV to be determined following a ALC survey

Commentary

	<p>The site is shortlisted as a potential affordable housing led site located within a minor rural settlement and would accord with the RLDP strategy and the delivery of affordable housing.</p> <p>In line with the Council's site assessment methodology an Agricultural Land Quality Assessment will be required to verify the presence and amount of BMV land within the site. The Council shall also require an updated viability appraisal of the site to determine if the site will support a minimum 50% affordable housing in accordance with the RLDP growth strategy.</p>
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5. Conclusion

- 5.1 The above assessment has evidenced how the Council has sought to minimise the impact of the RLDP on BMV agricultural land from development through its assessment of Candidate Sites. Key Sites identified within the Preferred Strategy account for 165.7 hectares of land, and some 132.35 hectares on adopted LDP sites carried forwards (including developed and areas under construction).
- 5.2 For the key sites, the Council has identified the presence of 8.34 hectares of BMV within the 2 key sites identified above, with the loss of 1.5 hectares at Church Farm considered justifiable due to the majority of the site being grade 3b. Regarding the potential loss of 6.84 hectares of 3a BMV identified within North East Barry, the Council has requested the site promoters to undertake an ALC survey to determine the presence and extent of the BMV presently identified on the predictive ALC map for Wales.
- 5.3 Regarding existing adopted LDP sites rolled forward, consultation undertaken with the Welsh Government Agriculture and Rural Affairs Department as part of the LDP (see Appendix 1) indicates a low probability of BMV present within these sites.
- 5.4 Finally, in addition to the above, the Council has identified 2 sites shortlisted as potential small scale affordable housing sites identified as containing BMV land. It is estimated there is 3.98 hectares of land present within the shortlisted sites. For these sites the Council will require ALC assessments to be undertaken prior to further consideration.
- 5.5 Presently, the above evidence indicates that the quantum of potential BMV impacted by proposed development in the Preferred Strategy to be in the region of 10.82 hectares, which is below the 20-hectare threshold specified within Technical Advice Note 6: Planning for Sustainable Rural Communities (July 2020) which requires the Council to formally consult the WG on the potential loss of BMV (Appendix B paragraph B.2 refers).

Appendix 1:

Adopted Vale of Glamorgan Land Bank Sites - Committed and Rolled Forward Housing Sites Consultation Assessment by Welsh Government Agriculture and Rural Affairs Department (Vale of Glamorgan LDP Agricultural Land Classification Supplementary Background Paper 2015)				
Reference	Settlement	Site Name	Area	Status
SP4 L1	Barry	Land West of Pencoedtre Lane	4.45 hectares	Rolled forward Adopted LDP allocation
Provisional ALC map shows the site as ALC Grade 3. The site is largely wooded to north with scrub encroachment at south. Site does not appear in intensive agricultural use. Soils shown as 'unsurveyed' on Soils of Wales (1984) but adjoin Denchworth Association. Soils of the Vale of Glamorgan (1972) show the site as a mix of Charlton Bank Series and Hurcot Complex – both poorly drained soils with high clay content. Unlikely presence of BMV due to soil wetness and workability limitations.				
Reference	Settlement	Site Name	Area	Status
SP4 L2	Cowbridge	Land adjoining St. Athan Road (part)	4.3 hectares (total)	Planning application awaiting determination
Site is shown on the provisional ALC map as a mix of ALC Grade 2 (approximately western third) and Grade 3 (remainder of site). There is no post 1988 ALC surveys for this site. There has previously been a pre-revision survey grading the site as Urban to the north, and an even mix of 3a/3b/4 to the south, 006-79 (1979). Mapped soil type is consistent throughout the site (Ston Easton Association). Based on previous experience of mapping this soil, there is a low probability of BMV, based primarily on soil limitations.				
Reference	Settlement	Site Name	Area	Status
SP4 L3	Cowbridge	Darren Farm	27 hectares	Under Construction
Provisional ALC Grade 2 and Subgrade 3a. Site surveyed in detail by a commercial consultancy in 2001, showing a high percentage of ALC Subgrade 3a land present. We have a record of this survey being validated in 1991 (027/91) confirming the site to be predominantly Subgrade 3b agricultural land.				
Reference	Settlement	Site Name	Area	Status
SP4 L4	Llantwit Major	Former Eagleswell School	2.4 hectares	Rolled forward Adopted LDP allocation
No comments provided – The predicted ALC Maps indicate site as Urban				
Reference	Settlement	Site Name	Area	Status
SP4 L5	Llantwit Major	Land between new Northern Access Road and Eglwys Brewis Road (east)	7.9 hectares	Rolled forward Adopted LDP allocation
The site is shown on the provisional ALC map as ALC Grade 2. There is no post 1988 ALC surveys for				

this site. The area was surveyed at reconnaissance level as part of a much larger ALC survey in 1979 (008/79). This shows the site as a mix of ALC Grade 2, Subgrade 3a, 3c and Grade 4. As this survey predates 1989, further assessment would be needed to confirm grading. Mapped soil type is consistent throughout the site (Ston Easton Association). Based on previous experience of mapping this soil, there is a low probability of BMV, based primarily on soil limitations.

Reference	Settlement	Site Name	Area	Status
SP4 L6	Llantwit Major	Land adjacent to Froglands Farm	4.4 hectares	Planning permission (subject to s106) 2020/00352/OUT

Provisional ALC map shows the site as mainly Non-agricultural, with a thin strip of Grade 2 at the northern boundary and adjoining provisional Grade 2 land. The site currently appears in intensive agricultural use, though the western parcel may be used for caravans. Soils mapped as Ston Easton Association (Soils of Wales 1984). Despite its intensive use, the site is unlikely to be BMV. This is based on survey experience of this soil type, linked to topsoil clay content (soil workability limitations)

ALC survey submitted in support of approved planning permission for western parcel of land confirms the presence of grade 3b and nonagricultural land as illustrated below- however the total area present of each grade have not been quantified within the ALC assessment.



Land at Llanmaes (East), Vale of Glamorgan
Figure 2(E). Agricultural Land Classification
Survey by: R Leverton BSc, PhD, CBiol, MRSB, FISOil Sci
Survey Date: 17th October 2018

Key	
	Subgrade 3b
	Non-agricultural Land
	Survey boundary

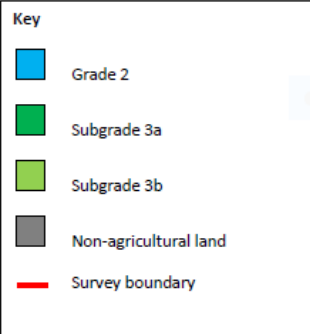
Reference	Settlement	Site Name	Area	Status
SP4 L7	Llantwit Major	Land between the Northern Access Road and Eglwys Brewis Road (west)	7.9 has	Planning permission (subject to s106) application 2020/00351/OUT

The site is shown on the provisional ALC map as ALC Grade 2. There is no post 1988 ALC surveys for this site. The area was surveyed at reconnaissance level as part of a much larger ALC survey in 1979 (008/79). This shows the site as a mix of ALC Grade 2, Subgrade 3a, 3c and Grade 4. As this survey predates 1989, further assessment would be needed to confirm grading. Mapped soil type is consistent throughout the site (Ston Easton Association). Based on previous experience of mapping this soil, there is a low probability of BMV, based primarily on soil limitations.

ALC survey submitted in support of approved planning permission for western parcel of land confirms the presence of grades 3b and non-agriculture with pockets Grade 2, 3a as illustrated below -however the total area present of each grade have not been quantified within the ALC assessment.



Land at Llanmaes (West), Vale of Glamorgan
Figure 2(W). Agricultural land Classification
Survey by: R Leverton BSc, PhD, CBIol, MRSB, F15oil Sci
Survey Date: 17th October 2018



Reference	Settlement	Site Name	Area	Status
SP4 L8	Penarth	Land at Upper Cosmeston Farm	22.2 hectares	Planning application awaiting determination 2020/01170/OUT

The site is shown on the provisional ALC map as ALC Grade 3. There is no post 1988 ALC surveys for this site. There has previously been a pre-revision survey grading the site as 3b, 004-79 (1979). The soil type is consistent throughout the site (Denchworth Association Soil Wetness Class IV / V). There is a low probability of BMV, due to likely soil limitations.

Reference	Settlement	Site Name	Area	Status
SP4 L9	Llandough	Land south of Llandough Hill / Penarth Road	5.2 hectares	Planning permission (subject to s106) 2020/01590/HYB

The site does not look agricultural, with high amounts of woodland, and amenity grassland. NO/LOW

BMV				
Reference	Settlement	Site Name	Area	Status
SP4 L10	Rhose	Land north of the Railway Line, (East)	13.5 hectares	Planning application awaiting determination 2022/0733/FUL
Land north of the Railway Line, Rhose Point (western element) – planning application 2014/00550/OUT for 350 houses includes a Land Assessment Report undertaken by Andersons for Taylor Wimpey (May 2014) that concludes that the land is ALC grade 3b.				
Reference	Settlement	Site Name	Area	Status
SP4 L11	St Athan	Land at Burley Place	2.2 hectares	Rolled forward Adopted LDP allocation
Provisional ALC Grade 2 on eastern side of site and Non-Agricultural on the remainder. The site is partly covered by a reconnaissance pre ALC revision survey from 1979 showing the surveyed area as Non-agricultural land. Soils mapped as Ston Easton Association at 209 Field Capacity Days. Unlikely presence of BMV due to soil limitations. Site appears all in non-agricultural use, appears to be a sports track and golf course.				
Reference	Settlement	Site Name	Area	Status
SP4 L12	St Athan	Land to the east of Eglwys Brewis	10.9 hectares	Under construction
Provisional ALC map shows the site as dominantly Provisional ALC Grade 2, with Grade 3 in western part of western parcel. The site appears in intensive agricultural use. Soils mapped as Ston Easton Association (Soils of Wales 1984). Despite its intensive use, the site is unlikely to be BMV. This is based on survey experience of this soil type, linked to topsoil clay content (soil workability limitations).				
Reference	Settlement	Site Name	Area	Status
SP4 L13	Sully	Land at Swanbridge Road	20 hectares	Under construction
Desk based review of October 2012 agricultural land classification report undertaken by Kernon Countryside Consultants Limited in March 2013. ALC identified as primarily Grade 3b with element of grade 4.				



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