Flintshire Deposit Local Development Plan 2015 - 2030



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Flintshire LDP

Background Paper

Minimising the Loss of Best and Most Versatile Agricultural Land

1. Overview

1.1 This Background Paper sets out the approach that has been taken in progressing the Plan in terms of a key principle embodied in Planning Policy Wales which is the protection of Best and Most Versatile (BMV) Agricultural Land and minimising its loss.

2. National Planning Guidance

2.1 Planning guidance for Wales is presently set out in Planning Policy Wales Edition 9. Chapter 4 explains the approach to planning for sustainability and a key element of this is protecting finite resources such as agricultural land. The Agricultural Land Classification Scheme directs that land of grades 1, 2 and 3a is defined and the 'best and most versatile' and should be conserved as a finite resource for the future. Para 4.10.1 of PPW states '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'.

3. Data Sources to Identify BMV Agricultural Land

- 3.1 The preparation of the Plan has used a number of data sources to establish whether the Plan is likely or not to affect BMV agricultural land. This has largely been focussed on the assessment of Candidate Sites. The key data sources are set out below:
 - The published Provisional 1:250,000 Series ALC Map for Wales this
 identifies land of different grades but does not distinguish between grades 3
 and 3a. The map is not drawn at a scale that is accurate in allowing the
 identification of whether particular land is BMV or not. The Welsh
 Government Chief Planner wrote to all Local Planning Authorities on

27/11/17 advising that the map was not accurate and was being withdrawn with immediate effect (see Appendix 1).

- Predicted Agricultural Land Quality on Candidate Sites The Welsh Government Agricultural Land Use & Soil Policy Advisor developed a system of predicting the loss of BMV agricultural land following consultation on the Candidate Sites. An initial set of results, supplied in 2015, identified a high, moderate or low probability of BMV agricultural land and an extract is set out in Appendix 2. A subsequent set of results, supplied in 2016, were more detailed and identified for each site any predicted or actual loss of BMV by amount. Clearly, those sites where an 'actual' loss was provided reflected a previous on-site agricultural land quality survey. An extract is set out in Appendix 3.
- Predictive Map The Welsh Government Chief Planner letter also referred
 to the availability of a new Predictive ALC Map for Wales which can be
 found on the Welsh Government website http://lle.gov.wales/map/alc. The
 map provides a visual representation of predictive and actual BMV
 agricultural land.

4. Consideration of Agricultural Land in the Preparation of the Plan

- 4.1 The preparation of the Plan has been through a number of stages including Key Messages document, Strategic Options and Preferred Strategy. The early stages of Plan preparation identified in the County commentary that there is a key resource of Best and Most Versatile agricultural land in the Sealand area of the County (e.g. para 2.0.4 Preferred Strategy). The Plan throughout its preparation has presented a series of Issues and Considerations of which no.19 'Support the safeguarding and sustainable use of natural resources and promoting the development of brownfield land' identifies as a distinct bullet point 'protection of best and most versatile agricultural land'.
- 4.2 The Deposit LDP does not contain specific policy provision in terms of seeking to protect BMV as this is something that is adequately set out in national policy and need not be repeated in the LDP. Instead, para 5.8.13 of the written statement which is part of the explanatory text to policy STR13, cross references to paras 3.54 and 3.55 of PPW10. The need to protect BMV is therefore clearly signposted in the Plan.
- 4.3 The preparation of the LDP has been accompanied by and informed by an ongoing Integrated Assessment involving Sustainability Appraisal and Strategic Environmental Assessment. The Plan is assessed against 18 appraisal 'objectives' and the 17th objective is 'Resources' which includes agricultural land. A shortlist of allocations and reasonable alternative sites has been the subject of detailed assessment against the 18 objectives. The assessment has flagged up the loss of BMV.

5. Assessment of Candidate and Alternative Sites

- 5.1 The submission form for submitting candidate sites included in the Environment section, a question relating to whether the site would result in the loss of agricultural land. The same approach was taken regarding the later opportunity to submit Alternative Sites. A Background Paper 'Candidate Sites Assessment Methodology' was the subject of public consultation before the final version was issued in May 2015 and appendix C of that document set out in Q3 that the loss of BMV agricultural land is one of the assessment criteria.
- 5.2 Following publication of the Candidate Site Register, consultation was undertaken with both internal and external stakeholders and consultees including the Welsh Government Agricultural Unit and it was following this consultation that the predictive approach to the loss of BMV agricultural land was developed.

6. Agricultural Land in Flintshire

- 6.1 In order to assess the impacts of the Plan on BMV agricultural land, it is necessary to gain an overall picture of where agricultural land is in the County. There is no grade 1 agricultural land in Flintshire. However there are large swathes of grade 2 agricultural land.
- 6.2 The predictive mapping resource identifies the following grade 2 agricultural land:
 - R. Dee Corridor a large block of land to the north and south of the R. Dee from Deeside Industrial Park to Chester and from Sandycroft / Bretton to Saltney
 - North of A548 A narrow belt of land to the north of the Coast Road between Llannerch y Mor and Greenfield, between Greenfield and Bagillt and between Bagillt and Castle Park, Flint (the latter also extends onto the south side of the A548)
 - Central Belt along A55(T), A5151 and A541 a belt of land running broadly north west to south east through the scentre of the County and broadly following the line of the A55(T), A5151 and the A541. In broad terms this belt runs from Trelawnyd and the Denbighshire border, all the way to Mold.
 - Land to the south and north west of Mold
 - Land along the River Alyn Corridor between the A541 and A550 extending down to HCAC
- 6.3 From actual survey work the following sites are grade 2 BMV:
 - North of Shotwick Road, Deeside Industrial Park associated with previous proposals for industrial development
 - North of R. Dee adjacent to Saltney / Chester (Watersmeet candidate site)

- Land North and South of A548 Sealand pockets of land associated with previous development proposals
- Southern and Western edge of Flint associated with previous proposals for a Flint Bypass
- South Eastern edge of Mold either side of Wrexham Rd, associated with the Mold (A494(T)) bypass.
- West of Northop Horticultural College
- The Gelli, Nannerch- small parcels of land on the eastern side of the A541
- 6.4 In terms of grade 3a agricultural land the picture is less clear as the land is more dispersed and fragmented. However, a general observation is that grade 3a tends to follow grade 2 land. From the predictive mapping resource it is possible to identify:
 - Following the central block of grade 2 agricultural land following the eastern edge of the Clwydian Range (AONB) and the edge of the central block in the vicinity of Holywell, Carmel and Whitford.
 - Along the A55 generally adjoining grade 2 land.
 - To the east of Holywell and Flint
 - Between Flint and Connahs Quay
 - A block from Mancot / Hawarden to Broughton and wrapping around the southern edge of Broughton
 - Around Higher Kinnerton
 - Alongside the A550 Penyffordd / Penymynydd to HCAC
 - A block from Northop through Sychdyn to Mold
 - Smaller parcels of land along the southern edge of Mod.
- 6.5 In terms of actual survey data for grade 3a agricultural land the following areas are identified:
 - Mold SW / S / SE / E and NE land associated with A494(T) and Mold bypass
 - Broughton Various sites including land at Warren Hall; land between A55(T) and slip round on the eastern edge of Broughton; land at Broughton Mills Road and land at Hawarden Industrial Estate.
 - Saltney land to west of Saltney Ferry Road (B5129)
 - Flint small parcels encircling Flint, associated with previous proposals for a bypass
 - Caerwys Land at Maes Mynnon Quarry, Caerwys, on north side of A541
 - Talacre various parcels of land around Talacre, associated with the former Point of Ayr Colliery.

7. Approach to Allocating Land in the LDP

Employment Land

- 7.1 The Plans strategy focuses on two mixed use strategic sites at Warren Hall and Northern Gateway. The former is a UDP allocation which has outline planning permission for employment development and the site area has been extended further to the west and further to the south and the mix of land uses broadened. The principle of development on the main part of the site, which will involve the loss of some BMV, is well established. Furthermore, the two extension areas will result in the loss of grade 3b land (based on actual site surveys) which does not represent a loss of BMV. The Northern gateway site is also a UDP allocation and both parts of the site have outline planning permission, with considerable progress being made on the discharge of conditions and the development of physical infrastructure work including flood defence and internal access roads. Although the development of the site will involve the loss of some predictive grade 2 agricultural land, the principle of development is now well established. The LDP will therefore involve no additional or new loss of BMV agricultural land associated with the two strategic sites.
- 7.2 The County has a well established land bank of employment sites from the UDP. These were reviewed as part of the Employment Land Study and have also been further reviewed in terms of constraints and ensuring that sites are still fit for purpose. In particular, this has resulted in two sites not being carried over into the LDP which are the UDP allocation EM1(16) Greenfield Business Park Phase III Extension and EM1(24) East of Saltney Ferry Road. Both sites would have resulted in the loss of predictive grade 2 BMV and are also located in flood risk zone C1 where development could not meet the justification tests in TAN1 as they are greenfield not brownfield land. In this context the Plan has sought to avoid and minimise the loss of BMV. The table in Appendix 4 sets out an assessment of the agricultural land implications of each employment allocation in the LDP.
- 7.3 The only employment allocation which does result in the actual loss of BMV is the Hawarden Park Extension near to Broughton. The site is allocated in the UDP and has previously had the benefit of outline planning permission and the principle of developing the site for employment development is well established. The site represents a logical extension to the existing industrial estate and is bounded by the Airbus operations at Hawarden Airport and by Manor Lane and the B5125 Chester Rd. The physically well-defined site is distinct from the wide agricultural landscape. It sits in a strategic location within the Deeside Enterprise Zone and close to key employment developments at Broughton. In this context, the loss of BMV is considered to be justified and necessary to the economic ambitions of the County and sub-region.

Housing

- 7.4 The Plan Strategy is based on a comprehensive set of settlement audits which assessed the sustainability of settlements and informed the Plans 5 tier settlement hierarchy. Policy STR2 directs that the planned housing growth, in the form of housing allocations, will only be made in the top three tiers (Main Service Centres, Local Service Centres and Sustainable Villages) as these are the most sustainable settlements. The Plan Strategy does not seek to apportion growth by a numerical approach, as in the UDP, and moves away from the concept that every settlement has to have a housing allocation. The Strategy is based on growth being directed to the most sustainable settlements and sites having regard to a range of factors including constraints, sustainability, strength of the local housing market and development interest. The focus for chosen allocations is that they are sustainable, viable and deliverable.
- 7.5 In looking at the distribution of BMV agricultural land there are three key blocks of grade 2 agricultural land:
 - The River Dee corridor from Deeside to Chester on the north and south side of the river. The Plan seeks to protect this area by virtue of the green barrier designation and its location within a C1 flood risk area will be protected by national policy. The River Dee is also a SSSI and SAC which would act as a constraint to development.
 - Dee Estuary / A548 corridor a narrow strip of land which is protected by location within C1 flood risk zone and its location adjoining a SSSI and SAC.
 - Central corridor this broadly follows the A55 through the County.
 Development will be controlled as a result of open countryside policies and the position of settlements in the settlement hierarchy.
- 7.6 At a strategic level the Plan strategy, policies and allocations will protect grade 2 agricultural land and prevent or minimise its loss. Throughout the County there are other smaller pockets of grade 2 agricultural land. The distribution of grade 3a agricultural land is less well defined geographically. In order to protect this land it is necessary to look at key settlements, particularly those in the first three tiers of the settlement hierarchy.
- 7.7 The technical assessment of candidate sites involved collaborative working with Welsh Government Agricultural Unit to establish a system of providing a predictive loss of agricultural land on each candidate site. This resource was invaluable in allowing the Council to identify the likely loss of BMV agricultural land. Where actual survey results were known, as a result of previous on-site survey work, these were also referenced to the Council. Wherever possible, allocations sought to avoid the loss of BMV land but in a small number of cases, allocations have been proposed where the loss of BMV would be involved. These allocations are considered to represent logical extensions to

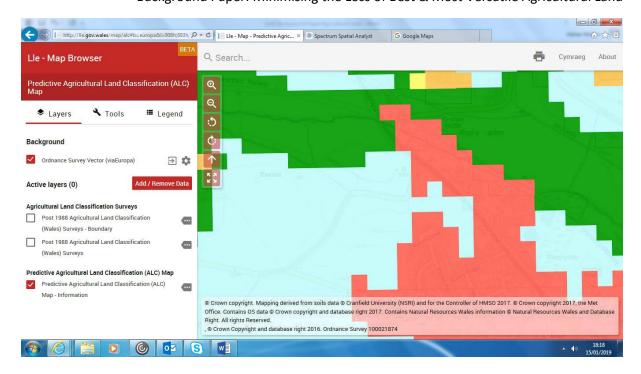
settlements where some loss of MBV can be justified. Each case will be commented on in turn below.

- 7.8 The Plans housing allocations are identified in Appendix 5 and can be summarised as follows:
 - Tier 1 Main Service Centres Buckley, Connahs Quay and Mold
 - Tier 2 Local Service Centres Ewloe, Hawarden and HCAC
 - Tier 3 Sustainable Villages New Brighton, Penyffordd / Penymynydd
- 7.9 The following commentaries relate only to sites where BMV is involved:

Tier 1 Settlements -

Mold

7.10 In the Tier 1 Main Service Centres, the only 'new' allocation which involves BMV is the site in Mold between Denbigh Road and Gwernaffield Rd. Mold is the administrative centre for the County and in a strategic location and has a vibrant town centre. It is constrained by green barrier to the south west (between Mold and Gwernymynydd) and to the north and west (between Mold and the outlying settlements of Mynydd Isa, New Brighton and Sychdyn). The River Alyn and its associated flood risk is a key constraint to development and the A494(T) is a physical limit to the southern expansion of the town. The only strategic direction for future growth is the north western part of the town. A constraint to the westerly expansion of Mold is that the existing road network is poor in terms of its capacity and suitability to serve further development. The land between Denbigh Road and Gwernaffield Rd has the advantage in that it can be served by a new road directly off Denbigh Road. This can not only serve the proposed allocation but adjoining parcels of land in a future development plan. The site has a predicted loss of grade 2 BMV although a Site Survey by Reading Agricultural has identified that due to chemical limitations arising from previous development, the loss would not involve land of higher than grade 3b. Verification by Welsh Government is awaited.



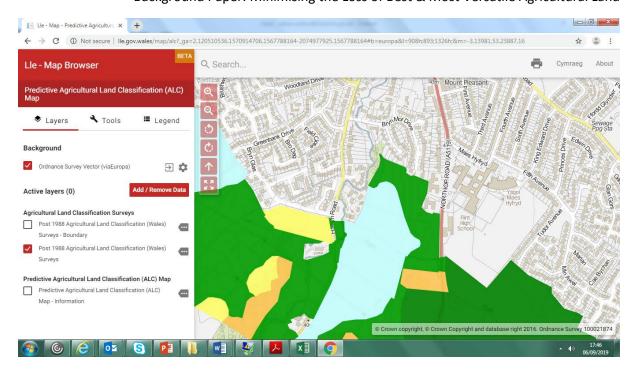
Connah's Quay

- 7.11 Land to the west of Highmere Drive is allocated in the UDP. Predictive data shows the loss of 5.0ha of grade 3a BMV. Connahs Quay is a large settlement on the edge of key employment areas centred around Deeside Industrial Park. The settlement is constrained to the south by the SSSI/SAC and the Wepre Country Park which effectively prevents further development. Development to the south west is constrained by a narrow and strategic green barrier between Connahs Quay and Northop Hall. The only strategic direction for growth is to the west of the settlement although this generally forms part of a green barrier between Connah's Quay and Flint. The site has the advantage that it is already within the settlement boundary, removed from the green barrier and with the principle of development well established. Land on the western edge of Connah's Quay, to the south of Mold Road is of a lower grade, being 3a, but this is in close proximity to SSSI and SAC and also the narrow gap between Connah's Quay and Northop Hall. On the north side of Mold Road the land on the western edge of Connahs Quay is predictive 3a, so the loss of BMV would occur in any event. The site represents a well defined and logical extension to the settlement.
- 7.12 An on-site survey has been undertaken which identifies the site as being classified as wholly grade 3b, which does not represent BMV. The site was verified by Welsh Government on 11/03/19 as being grade 3b following further on site investigation. The site therefore does not represent the loss of BMV agricultural land.



Flint

- 7.13 Land between Northop Road and Halkyn Road is the only new housing allocation in Flint. A housing commitment exists at Croes Atti on the north eastern edge of Flint and although candidate site submissions sought an extension to Croes Atti, this would be far too large having regard to the residual need identified in the Housing Balance Sheet to be met by new allocations. In simple terms, the expansion of Flint is constrained by industrial development to the north west, by green barrier to the south, and ultimately by green barrier to the east.
- 7.14 The Northop Road site represents a development opportunity which is of a scale proportionate to the identified need for new allocations, and having regard to the context for the town, in that it had a large site allocated in the UDP at Croes Atti. It is a site which has previously been allocated in the Deposit UDP but then removed by virtue of a Proposed Change. Although the Inspector did not recommend the inclusion of the site, she did not reinstate the green barrier with the effct that the site is shown as a white land between the settlement boundary and green barrier in the UDP. This represents a direction of travel which enables the development potential of the site to be re-considered as part of the LDP.
- 7.15 The site represents a logical extension to a tier 1 Main Service Centre as it is bounded by development on three sides. It lies adjacent to one of the main gateways into the town and is therefore in a sustainable location. The site slopes fairly steeply downwards from east to west and is dissected by a public right of way. In this context the loss of BMV is considered to be justified.



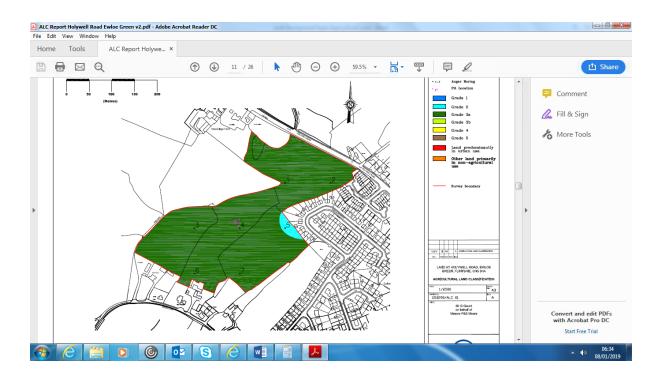
Tier 2 Settlements - Ewloe, Hawarden and HCAC

7.16 In the Tier 2 Local Service Centres there are three allocations which potentially involve the loss of BMV.

Ewloe

7.17 Land between Holywell Rd and Green Lane, Ewloe – Ewloe is a key Tier 2 settlement given its strategic location alongside the A494(T), proximity to two railway lines and adjoining settlements of Hawarden, Mancot and Shotton / Aston as well as Deeside Industrial park and the Northern Gateway site. The settlement is constrained by green barrier and is generally surrounded by BMV agricultural land. Many candidate sites relate poorly to the pattern of built development in the settlement and would harm the openness of the green barrier. The land between Holywell Road and Green Lane has the advantage that it does not harm the long term integrity of the green barrier between Ewloe and Northop Hall / Connah's Quay as the small river valley to the west of the site acts as a strong physical barrier to development. Although the site will involve the loss of grade 3a agricultural land it is not considered that there is any suitable land of a lower grade adjoining the edge of the settlement. The site represents a logical extension to the settlement and the loss of BMV has to be balanced against a range of other material planning considerations and constraints. The two candidate sites are in separate ownerships and neither site forms part of any wider agricultural holding. The allocation is reasonably close to the Special Area of Conservation (SAC) and also close to a wildlife site which follows a small valley to the west of the site, and in effect represents a continuation of the SAC. The development of the site would need a buffer of

land to protect the SAC and wildlife site to the west, which will serve to protect adjoining agricultural land. The allocation can therefore be seen as a 'once and for all' allocation in this part of the settlement and is unlikely to set a precedent for the future loss of adjoining BMV. In this context it is considered that the loss of BMV agricultural land is justified.

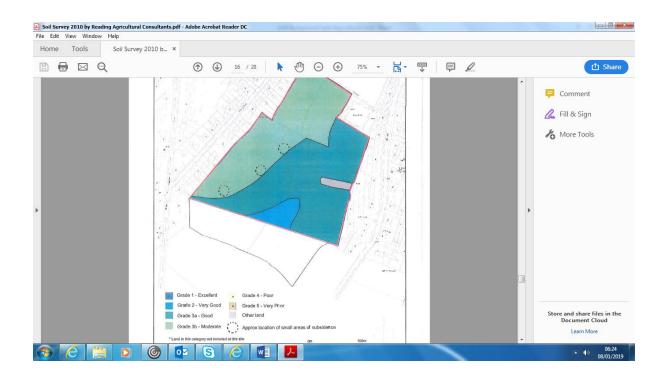


Hawarden

7.18 A smaller part of the site at Ash Lane has previously been recommended as a housing allocation by the UDP Inspector (but did not feature in the adopted Plan). A larger allocation is now being promoted in order to secure a vehicular and pedestrian link onto Gladstone Way in order to improve the relationship between the site and surrounding development, services and facilities. The site sits between Hawarden and Mancot and both settlements are surrounded by green barrier and by BMV agricultural land. Many of the candidate sites would harm the openness of the green barrier and the setting to the historic village of Hawarden. By contrast, the proposed allocation largely takes the form of an urban 'infill' type extension to existing built development. The northern part of the site (which was recommended for allocation by the UDP Inspector) would result in the loss of BMV land comprising 0.3ha grade 2 (5%) and 3.0ha grade 3a (49%). The remainder is 2.7ha of grade 3b (44%) and 0.1ha non-agricultural (2%). Welsh Government have confirmed that the additional land to the south (3.5ha) will be a mosaic of 3a and 3b. Assuming a similar split to the northern part of the allocation (54% BMV) the development of this part of the site would

result in a loss of 1.89ha of Grade 3a. The site as a totality would therefore result in a loss of 5.19ha of BMV.

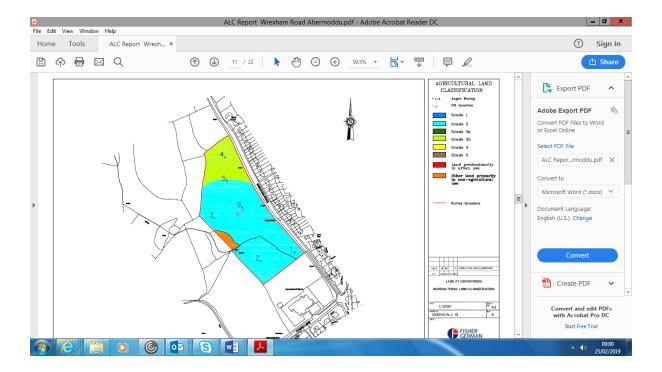
7.19 The identification of any development site on the edge of Hawarden or Mancot would be likely to result in the loss of BMV. The proposed allocation represents a logical urban extension which for the most part takes the form of infill development. Its proximity to urban development on three sides means it is vulnerable to urban fringe problems of unauthorised access. Its location, and relationship to the surrounding land holding of Hawarden Estates is not likely to adversely affect that land holding and its agricultural productivity. The fact that the allocation involves approximately 54% BMV demonstrates that it seeks to minimise the loss of BMV. The allocation also represents a sound and sustainable site when compared to others in the locality in terms of a range of constraints and planning considerations.



HCAC

7.20 The site at Wrexham Rd, Abermorddu was previously allocated by the Council in the UDP and recommended for allocation by the UDP Inspector, but was not included in the adopted UDP. Predictive data shows the loss of 3.34ha of grade 2 BMV and an on-site survey has been undertaken which identifies the site as grade 2 BMV and 3b non - BMV and this has been verified by Welsh Government. However, the site represents a flat strip of land at the foot of a steep linear hillside which runs parallel with Wrexham Road. The site is divorced from the wider agricultural landscape by both the topography and the

- existing school and recently constructed residential development on Cymau Lane. The site is used as a recreational link to open countryside.
- 7.21 The four villages (Hope, Caergwrle, Abermorddu and Cefn y Bedd) which comprise the single urban form of HCAC are all constrained by a variety of factors including floodrisk associated with the R. Alyn and R. Cegidog, Wats Dyke and topography. Although there is lower grade 3b land to the east of the settlement, particularly to the east of Gresford Road, development of this land would not relate well to the form and pattern of development and would not represent a logical extension to the settlement. The development of the land and the loss of a relatively small amount of BMV is considered to be justified in the light of the physical and geographical constraints relating to the site.



8. Conclusions

- 8.1 The preparation of the Plan has considered the protection of BMV agricultural from the outset and has sought to avoid and minimise its loss through the identification of land use allocations.
- 8.2 The two strategic sites do not involve the loss of an additional BMV as the sites already have planning permission and the modest extension of the Warren Hall site involves the loss of grade 3b land.
- 8.3 Only one of the Plan's employment allocations involves the actual loss of BMV. Of the total employment allocations of 139.67ha the Manor Lane / Hawarden Park Industrial Estate would result in a loss of 18.2ha which is 12%. The site is

allocated in the UDP and has previously had the benefit of planning permission. The site, which is Welsh Government owned represents a logical and well defined extension to an existing industrial estate adjacent to the Airbus complex. It sits at the heart of this part of the Enterprise Zone and its loss is fully justified in terms of meeting the economic ambitions of the Plan and Growth Deal.

- 8.4 Five of the Plans 11 housing allocations involve the loss of BMV. The Mold allocation shows a predictive loss of 10.2ha of grade 2 but on site survey results identify a grading of no more than 3b due to chemical limitations due to previous uses. The Ewloe allocation will result in the loss of 9.8ha of grade 3a / 0.12ha grade 2 land and the Hawarden allocation will result in the loss of 5.19ha of grade 3a (with a small proportion of grade 2). The HCAC site involves the actual loss of 3.52ha of grade 2. The Northop Road Flint site will result in the loss of 5.91ha of grade 2.
- 8.5 The Plans total detailed housing allocations represents 67.4ha of land. On the basis of all five of the above allocations being proven to result in the loss of BMV, the loss of BMV is 34.6ha or 51%. If the Mold allocation is proven to not result in loss of BMV then the loss would be reduced to 24.4ha or 36%. In all cases the allocations are considered to be logical urban extensions and in these settlements the loss of some BMV is inevitable. The choice of allocations is not solely informed by agricultural land quality alone and must be informed by the Plans spatial strategy, the sustainability of settlements and consideration of a range of other constraints and material planning considerations. In a County with a large number of settlements and a broad spread of BMV agricultural land it is likely that some loss of BMV would occur.
- 8.6 In conclusion it is considered that a sensible and pragmatic approach has been taken in considering BMV loss in terms of the national planning context in PPW10.

Background Paper: Minimising the Loss of Best & Most Versatile Agricultural Land

Appendix 1 – Letter From Welsh Government: Chief Planner

From: helen.bolton@gov.wales [mailto:helen.bolton@gov.wales] On Behalf Of

Neil.Hemington@Gov.Wales
Sent: 27 November 2017 13:42

To: Andrew Farrow;

Subject: Gwybodaeth Am Gategoreiddio Tir Amaethyddol / Provision Of Agricultural

Land Classification Information

Importance: High

Dear Colleague

PROVISION OF AGRICULTURAL LAND CLASSIFICATION INFORMATION

Planning Policy Wales (PPW) paragraph 4.10 outlines national policy towards conserving Wales' Best and Most Versatile (BMV) agricultural land. Further guidance is provided in Technical Advice Note (TAN) 6, including the consultation arrangements with the Welsh Government included at Annex B.

To apply BMV policy it is important to have access to land quality information. The Agricultural Land Classification (ALC) system provides a scientific method for grading the quality of agricultural land.

The published Provisional 1:250,000 Series ALC Map for Wales is not accurate and is being withdrawn from 27th November 2017. LPAs should not be using this data in development plan or development management decisions.

The Welsh Government has invested in developing a replacement national ALC map. This is know as the Predictive ALC Map (Wales). It will be freely available on the Welsh Government Environment Portal, Lle (http://lle.gov.wales/map/alc), from today for download as a shapefile or accessible through an online viewer.

The Predictive ALC Map (Wales) takes the best available data and applies the current ALC assessment guidelines and criteria to predict the grade of agricultural land. It also sub-divides ALC Grade 3 into Grade 3a (good land - BMV) and 3b (moderate land – Non-BMV).

The Welsh Government is committed to improving the evidence base for LPAs. The Predictive ALC map is designed to be updated as better information is developed.

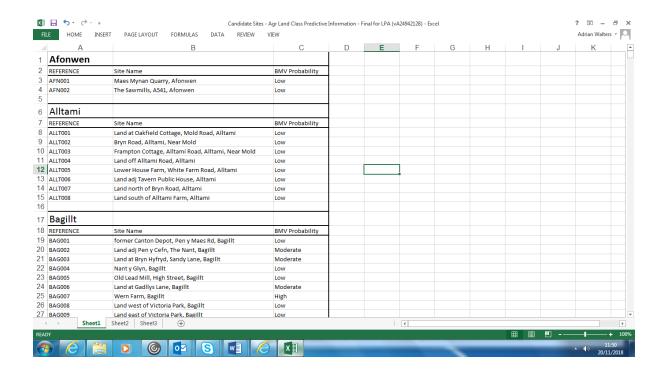
The Predictive ALC Map (Wales) will not replace the need for ALC site surveys. It is designed to inform planning decisions and target survey work. ALC surveys are complex and the Welsh Government therefore offers a free ALC report validation service which we would encourage LPAs to utilise. All consultations and requests for information can be emailed to the Land Quality Advisory Service: LQAS@gov.wales

Yours sincerely

Neil Hemington Chief Planner

Background Paper: Minimising the Loss of Best & Most Versatile Agricultural Land

Appendix 2 – Initial Consultation Response on Candidate Sites (extract) – 2015

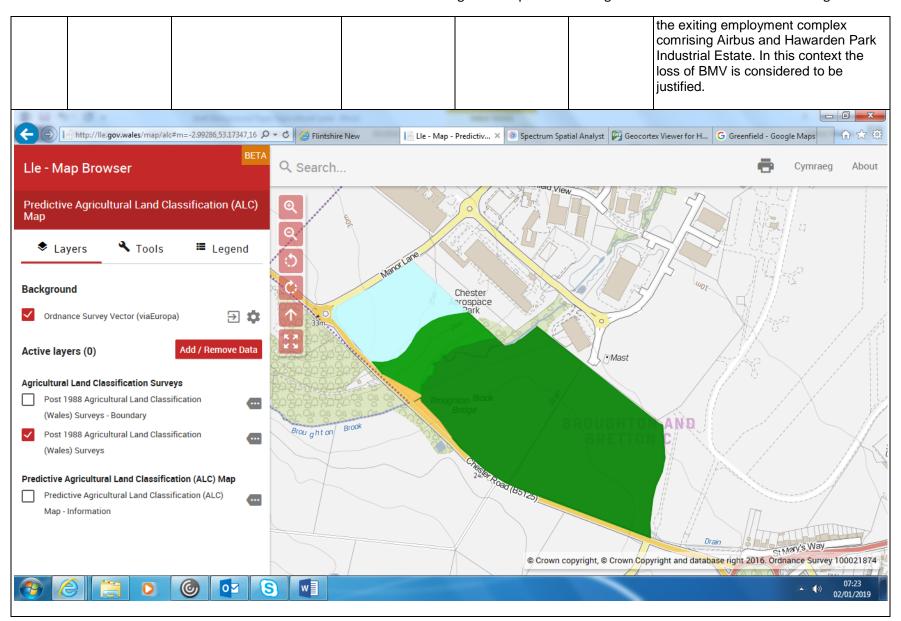


Appendix 3 – Follow up Consultation Response on Candidate Sites (extract) – 2016



Appendix 4 - LDP Employment Allocations – Agricultural Land

| Ref no. | Settlement / Location | Site | Area(ha) | Grade | Loss | Notes |
|---------|--------------------------|------------------------------------|----------|--|--------|--|
| 1 | Broughton | Chester Aerospace Park | 5.72 | Predicted urban for north part. Predicted 3a for southern part. | n/a | UDP employment allocation Bulk of site has either been developed or has planning permission. Land is sandwiched between existing industrial estate and Airbus and divorced from nearby agricultural land. |
| 2 | Broughton | Manor Lane/Hawarden Park Extension | 18.20 | Actual survey: 15.1ha grade 3a 1.9ha grade 3b 3.5ha grade 2 See map below | 18.2ha | UDP employment allocation Site has previously had outline planning permission for employment development. The site is bounded to the east by Airbus and Hawarden Airport, to the north by existing industrial development, to the west by Manor Lane and to the south by B5125 Chester Road. It is therefore divorced from the wide agricultural landscape to the south of the B5125. The land is also dissected by a linear woodland belt / wildlife feature. Although the development of the site would result in the loss of BMV, the principle of development is well established through existing UDP allocation and previous outline planning permission. The site lies within the Deeside Enterprise Zone and represents a logical extension to |

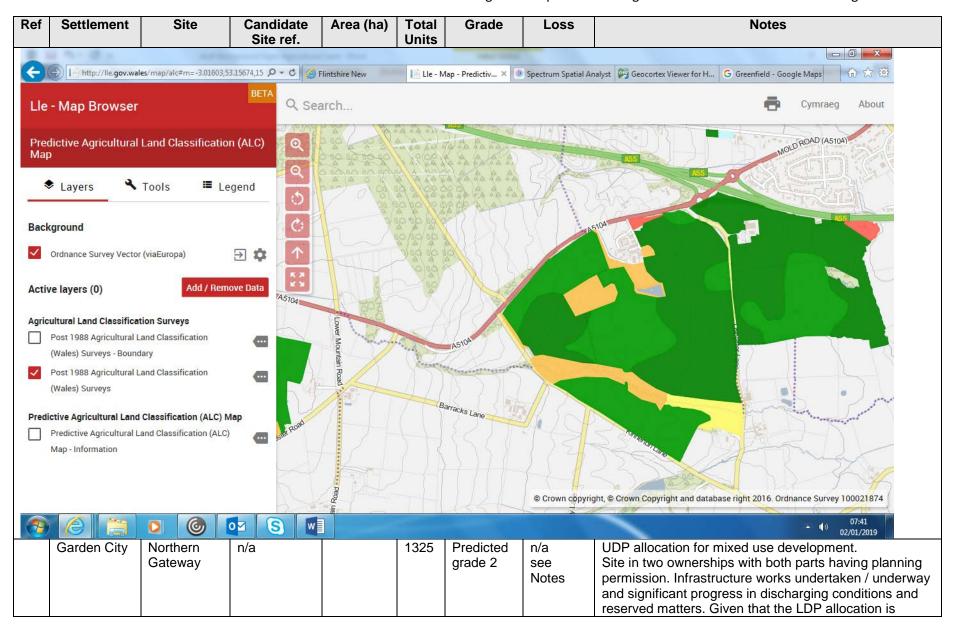


| STR3b | Broughton | Warren Hall | 22.70 | 3a and 3b Actual Survey by WG See map below | n/a see notes | UDP allocation Site has outline planning permission. The westerly and southerly extensions to the UDP allocation and outline planning permission, involves grade 3b and therefore does not involve the loss of BMV |
|-------|------------|--|-------|---|---------------------|--|
| 3 | Buckley | Drury New Road | 1.40 | Predictive 3b | n/a | n/a |
| STR3a | Deeside | Land to North West of Garden City | 72.40 | | n/a see notes | See strategic site – Northern Gateway |
| 4 | Greenfield | Greenfield Business Park, Phase II | 1.20 | Predicted 'urban' with narrow slither of grade 2 along railway line | n/a see Notes | The land sits between the railway line and A548 on northern edge of Greenfield and within an existing industrial estate. The site will not result in the loss of BMV agricultural land. |
| 5 | Greenfield | Greenfield Business Park, Phase III | 4.40 | Predictive grade 2 agr land alongside railway line | n/a see Notes | The land sits to the north and south of the railway line and is bounded to the west by the estate spne roadand to the east by existing employment development. It forms part of large band of employment land between the A548 and estuary and is divorced from the wider agricultural landscape. The site will not result in the loss of BMV agricultural land. |
| 6 | Mold | Broncoed Ind. Est. | 0.70 | Predictive urban | n/a | n/a |
| 7 | Mold | Mold Business Park | 3.90 | Actual 3a | n/a – see notes | Two parcels of land within Mold Business Park. Parcels have previously been cleared and levelled to create development platforms and allocated in UDP. Recent planning permission for industrial estate and hotel. |

| | | | | | | Parcels are divorced from agricultrual land on south side of A494(T) bypass. |
|----|-------------|-----------------------|-----------|----------------------------------|--------------------|---|
| 8 | Mostyn | Adjacent Mostyn Docks | 3.00 | Predictive grade 4 | n/a | n/a |
| 9 | Queensferry | Chester Road East | 3.15 | Predictive urban / grade 2 | n/a – see notes | Vacant land located on south side of railway line and bounded by existing retail, residential and industrial development. Divorced from predictive grade 2 land on the south side of Chester Road East. |
| 10 | Rhydymwyn | Antelope Ind. Est. | 1.10 | Predictive urban / grade 4 | n/a | n/a |
| 11 | Saltney | River Lane | 1.10 | Predictive grade 2 / urban | n/a – see notes | Vacant plot of land on south side of River Dee and sandwiched between existing industial uses within the industrial estate. The site is divourced from any nearby agricultural land. |
| 12 | Shotton | Rowley's Drive | 0.70 | Predictive urban | n/a – see notes | Vacant land located on south side of railway line and bounded by existing residential, industrial and retail development. Divorced from predictive grade 2 land on north side of railway line. |
| | | Total | al 139.67 | | 18.2ha | |

Appendix 5 - <u>LDP Housing Allocations – Agricultural land</u>

| Ref | Settlement | Site | Candidate Site ref. | Area (ha) | Total Units | Grade | Loss | Notes | | | | |
|-------|--|--------------|------------------------|-----------|----------------|---------------------------|--------------|---|--|--|--|--|
| Strat | Strategic Sites Broughton Warren Hall BROU011 74ha 300 3a and 3b n/a Bulk of site allocated in UDP and has planning | | | | | | | | | | | |
| | Broughton | walleli Hall | BROUTT | 741Id | 300 | Actual Survey by WG | see Notes | permission. Preferred Strategy proposed westwards extension of the site – grade 3b Deposit Plan proposes southwards extension of the site – grade 3b The whole site will result in an actual loss of 32.17ha grade 3a and predicted loss of 2.17ha grade 3a but the bulk of this land already has planning permission for business park. Compared with the UDP allocation and outline planning permission, the new allocation involves grade 3b and therefore does not involve the loss of BMV. | | | | |



| Ref | Settlement | Site | Candidate Site ref. | Area (ha) | Total Units | Grade | Loss | Notes |
|------|------------------|--|--------------------------------|--|----------------|--|--------------------------------|--|
| | | | | | | | | merely re-presenting the existing planning permissions, the LDP does not involve any additional new loss of BMV land. |
| Mair | Service Centr | | | | | | | |
| 1 | Buckley | Well Street | BUC031 | 5.3 | 159 | Predicted no loss of BMV | n/a | Predicted loss of grade 3b only |
| 2 | Connah's Quay | Broad Oak Holding, Mold Rd | CON002 | 1.3 | 37 | Grade 3a predicted 1.26ha | n/a see Notes | UDP allocation / mostly developed or with planning permission and planning application on remaining land under consideration. Council resolution 06/03/19 to grant planning permission subject to s106. |
| 3 | Connah's Quay | Highmere Drive | CON093 | 5.0 | 150 | Grade 3a Predicted 5.0ha Actual grade 3b | n/a see Notes | Grade 3a predicted 5.01ha Residual of UDP allocation – remainder of site built or with planning permission. Actual survey shows grade 3b which is not BMV and this has been verified by Welsh Government. |
| 4 | Flint | Northop Road | FLI007 FLI015 | 9.1 | 170 | Grade 2 5.62ha Actual Grade 3a 0.29ha predicted | 5.91ha | Previous Deposit UDP allocation now shown in UDP as white lane between settlement boundary and green barrier. Well defined and located site which is a logical urban extension. Sloping nature of site, urban fringe location and public right of way likely to limit agricultural potential |
| 5 | Mold | Maes Gwern | MOL020/057 | 5.7 | 160 | Grade 3a predicted | n/a see Notes | UDP employment allocation Planning permission granted and site under construction. Site sandwiched between school and residential and business park and divorced from wider agricultural landscape by A494(T) |
| 6 | Mold | Land between Denbigh Road and | MOL044 & MOL045 & MOL025 | 12.1 [10.2 to avoid flood risk] | 246 | Grade 2 predicted Awaiting results of | Predicted grade 2 10.2ha | Grade 2 predicted 3.25ha (northern parcel) Grade 2 predicted 8.3ha (southern parcel) Mold constrained by flood risk associated with R. Alyn and by green barrier to north east and south west. Nold |

| Ref | Settlement | Site | Candidate Site ref. | Area (ha) | Total Units | Grade | Loss | Notes |
|-----|----------------|----------------------------------|------------------------|------------|----------------|---|--|--|
| | | Gwernaffield Road | | | | WG verification of on-site survey | | north west represents only logical direction for future growth. Anwyl undertaken on-site survey which shows no higher than 3b due to chemical imbalances due to historic industrial development. Verification by Welsh Government is awaited. |
| | I Service Cent | | T | _ | 1 | 1 | 1 | |
| 7 | Ewloe | Holywell Road / Green Lane | EWL017 & EWL020 | 7.5 2.5 | 225 75 | EWL017 Grade 3a predicted 7.5ha Site Survey results – 7.46ha grade 3a and 0.12ha grade 2 EWL020 Grade 3a predicted 2.34ha | Loss 0.12ha grade 2 9.8ha grade 3a | Whole site predicted grade 3a 7.57ha Northern part of site - urban fringe location dissected by PROW Southern part of site - development on two sides and PROW on outer edge On-site survey commissioned by site promoter for EWL017 shows the bulk of the site is grade 3a with a small portion of grade 2 adjoining Circular Drive. Welsh Government have confirmed the findings of the on-site survey for EWL017 and have advised that the smaller site EWL020 is likely to be grade 3a. |
| 8 | Hawarden | Ash Lane | HWN005 | 9.6 | 288 | Grade 3a Predicted 3.21 Reading on-site survey for northern part of site identifies: | Actual loss: 0.3ha grade 2 and 3.0ha grade 3a Predicted loss on | Grade 2 predicted 3.21ha Earlier on-site survey identified site as being grade 3a Recent on-site survey identified site as being grade 2 Welsh Government rejected recent survey and consider that the earlier Reading Agricultural Report, which identifies the site as 3a and 3b and a small portion of 2, is accurate. WG advise that the additional land is likely to be a mosaic of grade 3a and 3b. Infill / urban extension bounded by dev to north west and east (part) by built development. Loss of this land is |

| Ref | Settlement | Site | Candidate Site ref. | Area (ha) | Total Units | Grade | Loss | Notes |
|------|----------------------------|------------------------------|------------------------|-----------|----------------|--|--|---|
| | | | | | | Grade 2 0.3ha- 5% Grade 3a 3.0ha- 49% Grade 3b 2.7ha- 44% Non agric'l 0.1ha – 2% | additional southern land (3.5ha) is mix of 3a and 3b. Assume similar split of 54% grade 3a is 1.89ha. Total loss of BMV is 5.19ha | not prejudicial to the remaining land holding of Hawarden Estates which can continue to be farmed. |
| 9 | HCAC | Wrexham Rd, Abermorddu | HCAC004 | 3.5 | 80 | Grade 2 Predicted 3.34ha | Actual 2.74ha grade 2 0.68ha grade 3b 0.08ha other land | Grade 2 predicted 3.34ha and on-site survey shows grade 2 and 3b which has been verified by WG Divorced from nearby agricultural land by topography and school / residential development. Recreational pressure – used as an unofficial link to countryside UDP Inspector recommended as allocation |
| Sust | ainable Village | S | | | | | | |
| 10 | New Brighton | Cae Isa, A5119 | NEW013 | 3.5 | 105 | Predicted no loss of BMV | n/a | Loss of predicted grade 3b only |
| | Penyffordd / Penymynydd | Chester Road | PEN038 | 7.7 | 186 | Predicted no loss of BMV | n/a | Loss of predicted grade 3b only Planning permission granted by Minister following Call- in. |

Flintshire Local Development Plan: 20015-2030

Background Paper: Minimising the Loss of Best & Most Versatile Agricultural Land

