

12.0 Agricultural Land Quality

12.1 Introduction

This chapter assesses the impact of the proposed development on Agricultural Land Quality. The chapter describes the methods used to assess the impacts, the baseline conditions currently existing at the site, the potential direct and indirect impacts of the proposed development, the mitigation measures and the residual impacts of the proposed development.

The chapter has been prepared by Kernon Countryside Consultants who are a specialist rural planning consultancy providing expert advice on agricultural land quality and planning policy surrounding the development of agricultural land.

The chapter refers to the following figures and appendices.

Figures	Title
Figure 12.1	Distribution of ALC Grades across the site.
Appendices	Title
Appendix 12.1	Agricultural Land Classification Survey by Soil Environment Services August 2008.

12.2 Scoping, Consultation and Overview of Potential Effects

The Scoping Report sought to scope Agriculture out of the Environmental Statement on the basis that:

- Although some of the land within the site and Keresley is of best and most versatile quality, this is characteristic of the wider area and therefore, nearby developments on greenfield sites would be likely to result in similar effects;
- The Sustainability Appraisal / Strategic Environmental Assessment did not list agricultural land as a potentially significant environmental effect;
- There was no mention of the loss of agricultural land by the Inspector in the Coventry Local Plan Examination.
- The site is allocated for development.

However, the Council's scoping opinion, dated 6th November 2018 stated that:

“Natural England advise that the applicant should consider the degree to which soils are going to be disturbed harmed and whether best and most versatile agricultural land is involved. This may require a detailed survey if one is not available. If required an agricultural land classification and soil survey should be undertaken.”

On the direction of the Council's scoping opinion this chapter considers the effects of the loss of agricultural land as a result of the proposed development.

12.3 Assessment Methodology

12.3.1 Policy Framework / Legislation

Legislation

The Town and Country Planning (Development Management Procedure) (England) Order 2015 sets out the requirement for consultation with Natural England where development of agricultural land is proposed. Local authorities should consult with Natural England where “development which is not for agricultural purposes and is not in accordance with the provisions of a development plan involves the loss of not less than 20 hectares of grades 1, 2 and 3a agricultural land which is for the time being used (or was last used) for agricultural purposes” or where the loss of less than 20 hectares of BMV agricultural land is “likely to lead to a further loss of agricultural land amounting cumulatively to 20 hectares or more”. (bullet point ‘y’ of schedule 4).

National Planning Policy

National planning policy governing the non-agricultural development of agricultural land is set out in the National Planning Framework (2018) (the NPPF).

Paragraph 170 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by inter alia “recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land”. Annex 2 of the NPPF advises that the best and most versatile agricultural land is land in Grades 1, 2 and 3a of the Agricultural Land Classification.

Paragraph 171 of the NPPF states that “Plans should: distinguish between the hierarchy of international, national and local designated sites; allocate land with the least environmental or amenity value where consistent with other policies in this Framework”. Footnote 53 notes that “Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.”

Local Planning Policy

Local planning policy is set out in the Coventry City Council Local Plan which was adopted in December 2017. There is no policy relating to the development of agricultural land.

12.3.2 Methodology

This chapter identifies and predicts the likely effects of the proposed development on agricultural land quality.

Baseline data regarding the agricultural land quality of the site has been obtained by a desk-based review of published ALC surveys.

The assessment has been carried out in three stages. Firstly, the importance / sensitivity of the receptor has been considered. Secondly the magnitude of the potential impact has been considered and thirdly the significance of the effect has then been determined by the interaction of magnitude and sensitivity. The effects have been determined by the thresholds set out in *Tables 12.1 – 12.3*.

There are no defined thresholds for assessing the impacts of non-agricultural development on agricultural land quality. However, Environmental Impact Assessment (EIA) requires various thresholds to be set. Accordingly, in consultation with other consultants and various agricultural departmental officers from the Department for Environment, Food and Rural Affairs (DEFRA) and Natural England (NE) the thresholds set out in this chapter have been adopted by KCC. *Table 12.1* sets out the sensitivity of the effected receptor (agricultural land).

Sensitivity	Receptor
High	Land resources are matters of potentially national importance with BMV agricultural land (Grades 1, 2 and 3a) recognised within the NPPF as being worthy of consideration. The effect on land resources is a combination of the quantum and quality of agricultural land affected, relative to both the national resource and the relative availability of that land locally. Land resources of BMV quality should therefore be classified as being of high environmental value (sensitivity).
Medium	Land that is of poorer quality (i.e. non BMV) Grades 3b, 4 and 5 is of lower sensitivity. It is nevertheless a finite resource of local importance and so is regarded as being of medium sensitivity.
Low	No receptors of low sensitivity
Negligible	No receptors of negligible sensitivity

Table 12.2 below sets out the magnitude of impact on agricultural land.

Magnitude of Impact	Impact on Agricultural Land
High	The proposed development would directly lead to the loss of over 50 hectares of BMV agricultural land (Grades 1, 2 and 3a).
Medium	The proposed development would directly lead to the loss of between 20 and 50 hectares of BMV agricultural land (Grades 1, 2 and 3a).
Low	The proposed development would directly lead to the loss of less than 20 hectares of BMV agricultural land (Grades 1, 2 or 3a). Or the loss of any quantity of non-BMV land agricultural land (Grades 3b, 4 or 5).
Negligible	No direct loss of agricultural land.

Table 12.3 sets out the interaction between the sensitivity of the receptor and the magnitude of effect enabling the significance of impact of the proposed development on agricultural land to be calculated.

		Sensitivity of Receptor			
		High	Medium	Low	Negligible
Magnitude of Impact	High	Substantial	Substantial	Moderate	Negligible
	Medium	Substantial	Moderate	Minor	Negligible
	Low	Moderate	Minor	Minor	Negligible
	Negligible	Negligible	Negligible	Negligible	Negligible

12.4 Baseline Conditions

The Agricultural Land Classification (ALC) system divides land into five grades according to the extent to which inherent characteristics can be exploited for agricultural production. ALC is based upon an assessment of limiting factors, including soils, climate and other physical limitations and the way in which these factors interact. Grade 1 is described as being of ‘excellent’ quality and Grade 5 at the other end of the scale is described as being of very poor quality. Grade 3 is differentiated into Subgrades 3a ‘good’ and Subgrade 3b ‘moderate’ quality agricultural land. The Grade or subgrade is determined by the most limiting factor present.

The current guidelines and criteria for ALC in England and Wales were published by MAFF in 1988. An agricultural land classification survey, which is in accordance with the current guidelines, was carried out across the site, as part of a larger survey, by Soil Environment Services Ltd in 2008. A copy of the full survey is at *Appendix 12.1*. *Table 12.4* below sets out the breakdown of ALC Grades across the Site.

ALC Grade	Area (Hectares)	Area (% of Site)
Grade 1 (Excellent)		
Grade 2 (Very Good)	19.9	73
Grade 3a (Good)		
Grade 3b (Moderate)	6	22
Grade 4 (Poor)		
Grade 5 (Very Poor)		
Non-Agricultural	1.4	5
TOTAL	27.3	100

12.5 Mitigation Measures

12.5.1 Inherent Mitigation Measures

The loss of agricultural land is permanent, and mitigation is best achieved by limiting the extent of development to the smallest size possible, consistent with operational requirements. There are no measures that can be put in place to mitigate the effects of the proposed development on agricultural land.

12.5.2 Standard Mitigation Measures

Soils have a number of important functions beyond the support and growth of plants. These include improved drainage and maintaining solution pathways, supporting ecosystems and providing green areas for communities to use and enjoy. In order to sustain these basic functions, it is important that appropriate consideration is given to the soil resource on a development site, as if it is not managed carefully during the construction and ground preparation phases, these functions can be lost.

More guidance on mitigation in relation to the management of the soil resource on site is given in Table 6.1 of the draft Construction Environmental Management (CEMP) in *Appendix 4.1*.

12.5.3 Actionable Mitigation Measures

No actionable mitigation is proposed.

12.6 Assessment of Environmental Impacts

12.6.1 Impact Assessment

The effects on agricultural land quality, i.e. its loss, commence at the beginning of the construction phase when the developers first take occupation and the land is taken out of agricultural production. This effect continues throughout the occupation of the proposed development. However there are no new effects on agricultural land as a result of the occupation of the proposed development.

Construction Phase

The proposed development involves the development of approximately 26 hectares of agricultural land. The remainder of the site comprises agricultural and equestrian buildings / yards, ponds / woodland and highways land.

The agricultural land that is proposed for development has been identified as a mix of Grade 2 and Sub grade 3b. The Grade 2 land falls into the “best and most versatile” category and accordingly is a receptor of high sensitivity. The magnitude of effect as a result of the irreversible development of 19.9 hectares of “best and most versatile agricultural land is low leading to a moderate significance of impact.

Although the effects of the proposed development are of moderate significance, the ALC survey carried out around Keresley identified much of the land to comprise of Grade 2 and Subgrade 3a. Therefore, it is likely that a development of a similar size in the locality would have similar effects on agricultural land.

Table 12.5 - Summary of Impact Assessment – Construction Phase						
Receptor	Sensitivity of Receptor	Description of Impact	Inherent & Standard Mitigation Measures	Magnitude of Effect	Type of Effect	Significance of Effect
Loss of 26 hectares of agricultural land of which 19.9 hectares is Grade 2 i.e. “best and most versatile agricultural land”.	High	The proposed development will involve the irreversible development of agricultural land	See draft CEMP in <i>Appendix 4.1</i>	Low Adverse	Permanent Direct	Moderate Adverse

Occupation Phase

There are no new effects that will result from the occupation of the proposed development.

12.6.2 Residual Impact Assessment

No actionable mitigation has been proposed. Accordingly, the residual effects will be as set out in *Section 12.6.1*.

12.7 Cumulative Impact Assessment

Application OUT/2014/2282 involves the development of 42 hectares of agricultural land of which 31 hectares are identified within the Environmental Statement to comprise of “best and most versatile agricultural land”. Cumulatively these two developments will lead to the loss of over 50 hectares of “best and most versatile agricultural land” which will result in a high magnitude of effect on a receptor of high sensitivity leading to a **substantial adverse** significance of impact.

The development of the remainder of the SUE will result in the loss of additional agricultural land, some of which will fall into the “best and most versatile” category. However, the cumulative significance of effect resulting from the development of the above two sites is already **substantial adverse** so will not increase further.

12.8 Summary

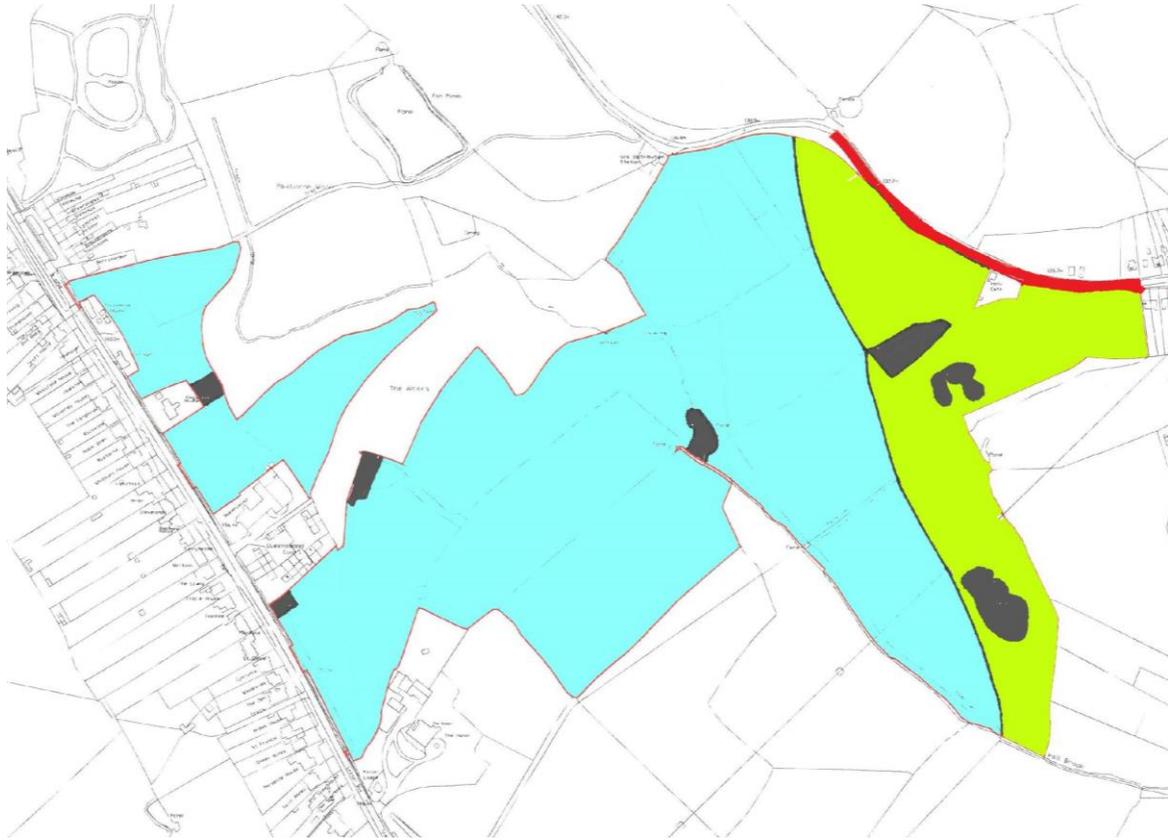
The proposed development involves the irreversible development of approximately 26 hectares of agricultural land, with the remainder of the site comprising of existing highways, agricultural and equestrian buildings / yards and woodland / ponds.

The agricultural land proposed for development was the subject of an Agricultural Land Classification which was carried out in 2008. The survey identified the site to comprise mainly of Grade 2 land, i.e. “best and most versatile agricultural land” but with some Sub grade 3b to the north of the site.

Best and most versatile agricultural land is a receptor of high sensitivity, however with less than 20 hectares (19.9 hectares) being developed, the magnitude of effect is low which results in a **moderate adverse** effect.

The impact on agricultural land has to be seen in context. With most land on the north western edge of Coventry comprising of “best and most versatile” quality, a development of a similar size would result in the same level of impact, if not worse, if it involved more than 20 hectares of BMV land.

There is little that can be done to mitigate against the loss of agricultural land. Soils handling and conservation should be undertaken in accordance with the relevant chapters in “the Good Practice for Handling Soils” (MAFF 2000).



KEY	Ha	%	PLAN	12.1			
	Grade 1		TITLE	ALC Grading			
	Grade 2	19.9	73	SITE	Keresley		
	Grade 3a			CLIENT	Bellway Homes		
	Grade 3b	6	22	NUMBER	KCC2669/01 12/18		
	Grade 4			DATE	Dec 2018	SCALE	NTS
	Grade 5			KERNON COUNTRYSIDE CONSULTANTS LTD GREENACRES BARN, PURTON STOKE, SWINDON, WILTSHIRE, SN5 4LL Tel 01793 771 333 Email: info@kernon.co.uk			
	Urban	0.6	2				
	Non Agricultural	0.8	3				