



Agricultural Significance

Land at Salph End

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September 2020

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Contents

1.	Introduction.....	3
2.	Background.....	4
3.	Wider context.....	6
4.	Current Agricultural Use	8
5.	Planning Policy	10
6.	Discussion.....	11
7.	Precedents.....	12
8.	Conclusions	15

1. Introduction

- 1.1 Berrys has been instructed by Manor Oak Homes Limited to prepare a statement regarding the economic and other benefits of a 20ha parcel of land to the west of Ravensden Road, Bedford. The statement is in consideration of paragraph 170 (b) of National Planning Policy Framework (February 2019) which directs planning policies and decisions to '*conserve and enhance the natural environment*' by recognising '*the benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land*'.
- 1.2 This statement is based on available mapping of the land and the surrounding area, photographs and an ALC Survey Report prepared by Berrys in July 2020.
- 1.3 The author of this statement, William Tongue, has 20 years' experience working in agricultural business consultancy - work that is mostly concerned with the profitability and performance of farming businesses but also includes Agricultural Land Classification fieldwork and reporting for planning purposes.

2. Background

- 2.1 Agricultural land is classified using the guidelines set out in the publication “Agricultural Land Classification of England and Wales” (MAFF,1988). This provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations on agricultural use. Land may be classified into one of five grades, Grade 1 land being of excellent quality and Grade 5 land of very poor quality. Grade 3, which constitutes about half of the agricultural land in England and Wales, is divided into two sub-grades designated 3a and 3b. Grade is determined by the most limiting factor. Grades 1, 2 and 3a are deemed to be the ‘Best and Most Versatile Land’ (BMV).
- 2.2 Survey of the site at Salph End has determined 15.60ha to be Grade 3a and 3.82ha Grade 2. Therefore, the whole site is classed as BMV land.
- 2.3 The soils on the site are clay loams over clay. The main limitations found in the ALC survey were wetness due to the impeded drainage caused by the clay although being in a relatively low rainfall area and with clay’s low porosity (summer) droughtiness also proved to be a limitation.
- 2.4 The site comprises two adjoining field parcels, one of c.3.80ha and one of c. 15.60ha, divided by a small watercourse. It is bounded to the west by a golf course and then Bedford, to the south by the linear settlement of Salph End, to the north by amenity woodland and then agricultural land and to the east by Ravensden Road. As such it is not directly contiguous with other agricultural land, but the landscape opens out to become predominately agricultural to the north.

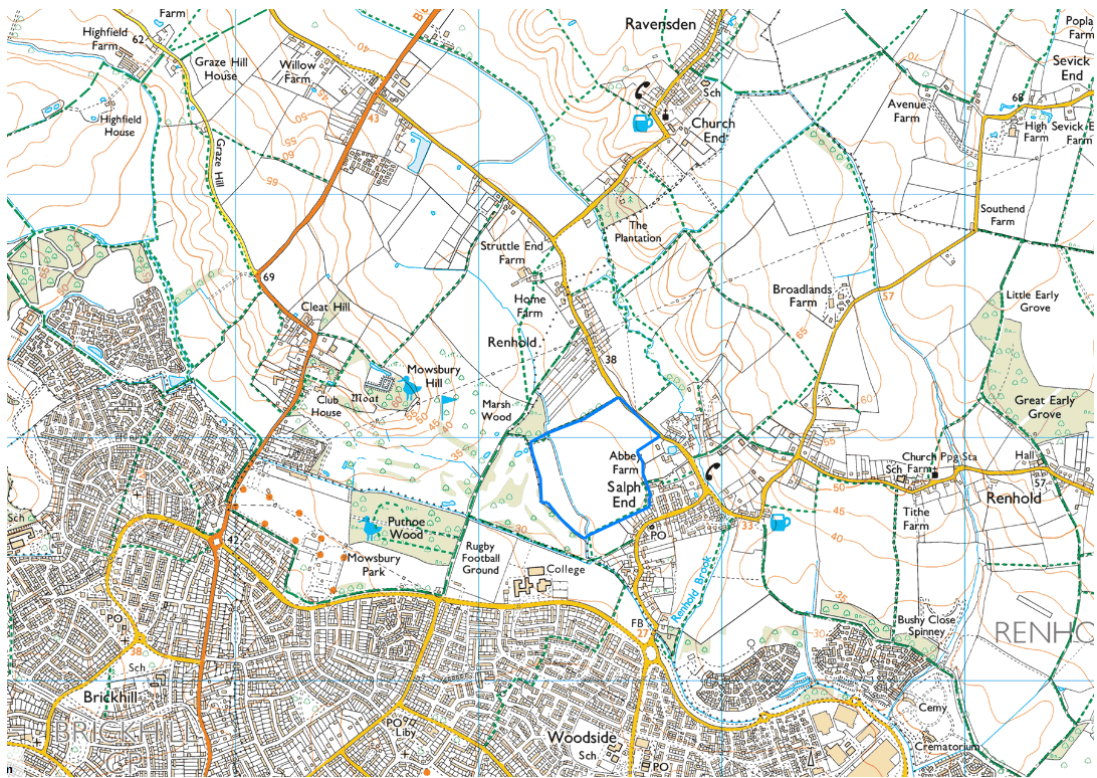
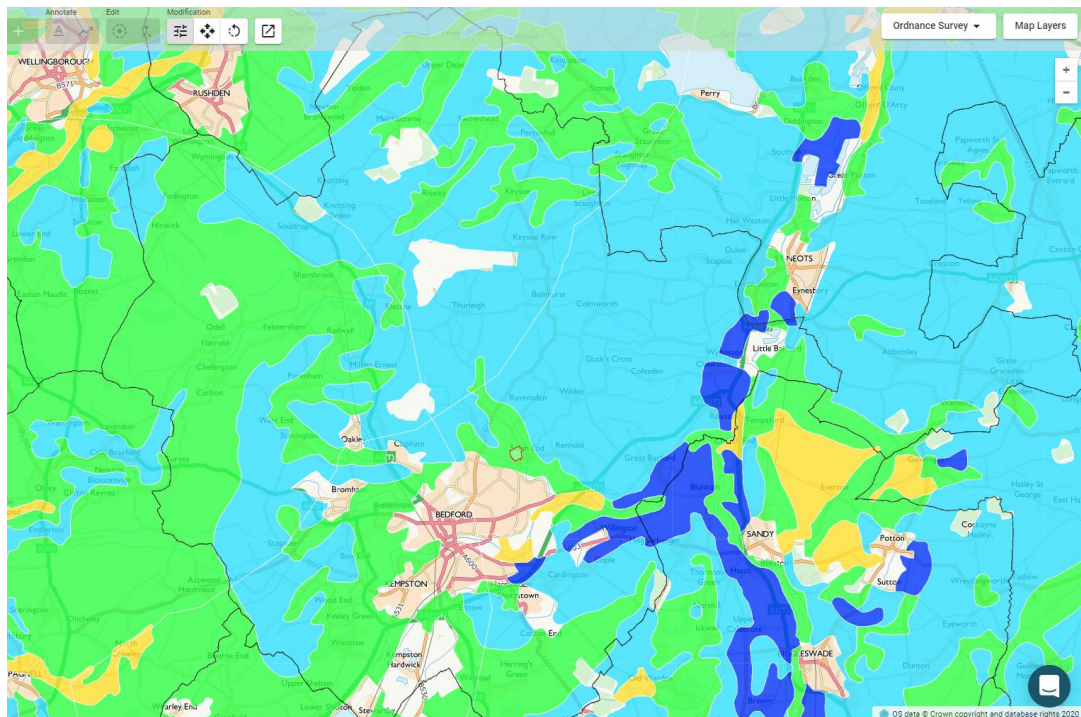


Figure 1 : Site at Salph End, Bedford

3. Wider context

3.1 The site, outlined below in red to the North East of Bedford, sits in an area of provisional Grade 3 land. In the wider area, the western side of Bedford Borough is provisional Grade 3 along with the majority of Bucks, Northants, Oxon, Leics, Warks i.e. most of middle England. Bedfordshire is the dividing line with a predominance of Grade 2 land from Bedford to the East into Cambridgeshire, Lincolnshire and North Essex. The Grade 1 land in Bedford Borough follows the River Ouse floodplain East of Bedford generally benefits from irrigation and hence is commonly used for root cropping and some vegetables.



Legend: Grade 1 Grade 2 Grade 3 Grade 4

Figure 2 : Provisional Agricultural Land Classification in Bedford Borough

Source: <https://go.thelandapp.com/map/5f3d5e7f00358700190747b2>

3.2 The breakdown of land grades within Bedford borough is:

	Ha	%
Grade 1	1137	2.4
Grade 2	22959	48.1
Grade 3	17601	36.9
Grade 4	273	0.6
Non Agric	5771	12.1
Total	47740	

Table 1 : Breakdown of ALC land quality (provisional) in Bedford Borough

Source: Figure 2 : Provisional Agricultural Land Classification in Bedford Borough, analysed Berrys

By comparison the site at Salph End is 20% Grade 2 and 80% Grade 3.

4. Current Agricultural Use

- 4.1 The site is currently used for growing combinable crops, very typical for this part of Bedfordshire where rotations are focussed around relatively high yielding wheat crops (relative to national average), plus appropriate break crops like oilseed rape and beans.
- 4.2 Grade 2 land is defined by Natural England as '*Land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown. On some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops, such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than Grade 1*'.¹
- 4.3 Grade 3a land is defined by Natural England as '*Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of crops including cereals, grass, oilseed rape, potatoes, sugar beet and less demanding horticultural crops*'.²
- 4.4 As the site is mostly Grade 3a, the current use for combinable crops is appropriate to the expectation of land use according to the grade. Historically, the occasional potato and sugar beet crops would be found on these types of Bedfordshire soils, but it would be unusual now due to:
- Lack of irrigation to overcome droughtiness limitations.
 - Lack of local specialist infrastructure, skills, machinery and processing capacity.
 - Lower yield potential on marginal soil conditions affecting economic viability.
 - Lower quality expectation – for example greater skin scabbing or bruising on potatoes – due to heavier soils.

¹ <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

² As 1

4.5 The financial performance of 20ha of combinable cropping under a rotation typical to the area as discussed above might be:

	Rotation	Yield t/ha	Gross Margin £/ha	Net Margin £/ha	Contribution £/ha
Feed Wheat	25.0%	10	862	60	15
Milling Wheat	25.0%	8.2	724	-71	-18
Spring Barley	25.0%	7.5	748	-29	-7
Winter Beans	12.5%	3.75	384	-195	-24
Winter Oilseed Rape	12.5%	3	570	-214	-27
				Rotation net margin	-61

Table 2 : Budget Net Margin from combinable cropping

(Source: HSBC UK *Forward Planning 2020*, November 2019. <https://www.business.hsbc.uk/-/media/library/business-uk/pdfs/forward-planning-2020.pdf>)

4.6 Combinable crop production from the 20ha site is therefore budgeted to earn a net loss of (-£61/ha x 20ha) £1220. This not an uncommon expectation, and the reason for continuing to crop the land would be:

- As part of a much larger unit, overhead costs would decrease with scale (the budget overhead costs used in this exercise relate to a 650 acre farm).
- The Basic Payment Scheme subsidy payment due in relation to the land would be c. £230 /ha (£4,600 total). Although this is not linked to the growing of crops, in farm business decision making it is often treated as part of the gross margin. As currently proposed under the Agricultural Bill (<https://services.parliament.uk/bills/2019-21/agriculture.html>), at report stage in the House of Lords at time of writing, this is due to be phased out over a 7 year period from 2021 to 2028

5. Planning Policy

- 5.1 National Planning Policy Framework paragraph 170 (b) directs planning policies and decisions to ‘*contribute to and enhance the natural environment*’ by recognising ‘*the wider benefits from natural capital and ecosystem services*’ and ‘*the economic and other benefits of the best and most versatile agricultural land*’.³
- 5.2 Policy 46S of the Bedford Borough Local Plan 2030 considers development of agricultural land and states “*Where significant development is demonstrated to be necessary on agricultural land, poorer quality land should be used in preference to the best and most versatile agricultural land (Grades 1-3a). Where the site is located on agricultural land outside of existing settlements, applicants will be required to provide evidence of the grade of agricultural land and, where that land is likely to be Grade 3 or higher, undertake a detailed survey of land quality.*”⁴
- 5.3 In determining the above policy 46S, Bedford Borough recognises in paragraph 9.3 of the Adopted Local Plan that “*Agriculture is a major use of land in the borough and a significant proportion of farmland and other undeveloped land is classified as the ‘best and most versatile’ (i.e. Grades 1, 2 and 3a).*”⁵
- 5.4 Thus, local policy says, in effect, lower quality land should be used as a preference and it is important to identify the quality involved. National policy says that all benefits from natural capital and ecosystem services must be considered as well as the economic benefit and other benefits of BMV land.

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf Paragraph 170 b

⁴ <https://bbcdevwebfiles.blob.core.windows.net/webfiles/Planning%20and%20Building/local-plan-2030/Local%20Plan%202030%20ADOPTED%20VERSION.pdf> Section 9

⁵ As 4

6. Discussion

- 6.1 As set out in section 4.6, the economic benefit of the site to the agricultural business that occupies it is negligible – a loss of £1200 before subsidy or £3400 after the subsidy which is due to be removed.
- 6.2 The value of inputs purchased by the agricultural business in relation to the site (derived from the same budgets) would be in the region of £24,000. Assuming a 10-15% profit margin for the suppliers providing these inputs the wider benefits in the agricultural supply chain is also negligible.
- 6.3 The land is not critical to the local or national food supply – if domestic supplies of cereals, oilseeds and proteins were low and imports were unavailable or significantly more expensive then economics dictates that price would be higher to encourage production.
- 6.4 The subject site is 20% Grade 2 whilst the overall land quality in Bedfordshire is 48% Grade 2 – thus in overall terms the site has a lower proportion of Grade 2 land than the county around it.
- 6.5 Policy also refers to natural capital and ecosystem services. Natural capital is the stock of natural assets that provides benefits to humans via flows of ecosystem services. Such services include:
- Provisioning – supply of food and energy.
 - Regulation – storage of carbon, water, climate regulation, flood control etc.
 - Cultural – recreation, tourism, culture etc.
 - Supporting – providing habitats.
- 6.6 The agricultural quality and therefore productivity of the land clearly has a strong linkage to provisioning services and potentially to energy that might be supplied through energy crops grown. In all other respects the potential natural capital value is much more related to site factors such as aspect, location, gradient, adjoining land uses etc. To an extent these factors are considered in other statements such as Visual Impact, Ecology, Archaeology etc. and are mostly unrelated to the agricultural land quality.

7. Precedents

- 7.1 NPPF 2019 was preceded by NPPF 2012 which included similar reference to the preference not to develop BMV land in paragraph 112. This was tested in in the High Court Case *Borough of Telford and Wrekin v. (1) Secretary of State for Communities and Local Government (2) Gladman Developments Ltd* [2016] EWHC 3073 where Mrs Justice Lang writes:

“38. I agree with Coulson J.’s interpretation of the NPPF, but upon applying it here, I have concluded that NPPF 112 cannot be characterised as a policy which indicates that “development should be restricted” within the meaning of NPPF 14. I accept the Defendants’ submissions that the policy is simply an instruction (i) to “take into account” the economic and other benefits of the best and most versatile agricultural land which does not confer any particular level of protection and (ii) to “prefer” the use of poorer quality land if significant development of agricultural land is necessary, which applies to all agricultural land, not just BMV land. It is not a prohibition on the use of BMV agricultural land, nor a restriction on development in principle; it does no more than to encourage the relocation of proposed development onto poorer quality agricultural land if available.”

- 7.2 Point (i) of this judgement serves to remind decision makers that the policy instruction is to “take into account”, not restrict. The word ‘prefer’ is no longer in NPPF (2019) but does remain in local policy as identified in section 5.2. Therefore point (ii) also remains relevant.

- 7.3 As identified in section 3.2, the supply of BMV land in Bedford Borough is plentiful and therefore the suggestion is that the impact of the loss of 20ha is low. This is supported by a Planning Inspector’s decision of 15 April 2016 regarding a housing development at land north of Haygate Road, Wellington, Shropshire. That inspector’s report reviewed the issue of supply of BMV land in the area of Telford and concluded:

“144. From the conclusions I have already reached on the main issues I consider that the proposed development would result in some adverse impacts, but that these would be limited. My reasoning is set out fully in the appropriate paragraphs, above, but in summary there would firstly be a loss of just over 15 ha of BMV agricultural land. But as much of the agricultural land surrounding Telford is of BMV status,

and as it is clear that this has not prevented the Council from recently granting planning permission for a scheme at Priorslee which will result in a much greater loss of BMV land than here, I can only give this impact a modest amount of weight.”

7.4 This precedent would suggest that recent permissions in the local area are of value to determining the importance of the loss of BMV land. The most relevant is therefore 19/00593/MAO – A 17.70ha site at Graze Hill, just 1.3km from Salph End. Like Salph End this site is Grade 3 in the provisional ALC mapping and therefore could be Grade 3a BMV land. Agricultural Land Quality was not identified in this application nor considered in the determination.

7.5 Other relevant allocations and recent development include

Local plan 2030 Policies		Approx ha	Provisional /*Post '88 Grade
22	Lodge Hill	4.7	3/ urban
19		5.6	3
23	Bromham Road	2.34	3
21	Mowbray Road		Urban

Recent developments (Per local Plan 2030)

H10b	Norse Road	10	3a*
H10a	Brickhill		
H8	North of Bromham Road	36	3
H6	Biddenham Loop	45	3
H7	Land West of Kempston	47	3
1080	Fields Road	58	3b
H13	Stewartby	16	3b
AD5/H14	Wixams	320	Urban/3
H9	Shortstown	26	Urban
r/o	Sheds	14	Urban

Table 3 : Current and recent allocations in Bedford Borough

Source: Bedford Local Plan 2030, analysed Berrys

- 7.6 This analysis of current /recent developments in Bedford Borough shows that only approximately 12% of development by area has been directed towards land identified by post 1988 Survey as Grade 3b, i.e. not BMV. (Note analysis based on Provisional ALC mapping and detailed Post 1988 Surveys as publicly available on www.magic.defra.gov.uk).

8. Conclusions

- 8.1 The site at Salph End has been identified as BMV land but this is typical to Bedfordshire where only 0.6% of land is below this as recorded on Provisional Mapping and 37% might or might not be BMV as it is recorded as provisional Grade 3 (not split into 3a and 3b). Conversely 48% of Bedfordshire is provisionally Grade 2. Therefore, by area the site is of little significance to the supply of BMV land in the Borough.
- 8.2 The economic benefit of the land to agriculture and related supply chain businesses is negligible excluding subsidy. The subsidy amounts to c.£4,600 but is due to be removed.
- 8.3 Other benefits from ecosystem services arising from the Natural Capital assets of the site are not substantially related to land quality and are considered in other statements.
- 8.4 Precedent suggests that policy wording that states a preference for developing lower quality land does not confer a prohibition on developing BMV land.
- 8.5 Current and previous residential developments in Bedford Borough have generally been on provisional Grade 3 land. The most recent and relevant comparable, the site at Graze Hill, has not identified the actual land grade.
- 8.6 Therefore, for the reasons above it is suggested the agricultural significance of the loss of c. 20ha of land at Salph End is low.