

# P-06-1344: Moderate quality agricultural land (grade 3b) should be used for food security not solar farms

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Reference: SR23/5997-6

**Petition Number:** P-06-1344

**Petition title:** Moderate quality agricultural land (grade 3b) should be used for food security not solar farms

**Text of petition:** We must conserve 3b land to safeguard food security:

- Only 10-13% of Wales is Best & Most Versatile land (grades 1-3a). Climate change risks change to agricultural land grades
- 3b land supports crops
- Solar farms with 3a land within 3b land parcels are being approved (contrary to Welsh Government policy). Construction/decommission permanently damage land; 3a land will be lost
- Dual-purpose claims to offset land loss have no contractual obligation - sheep rarely graze under solar panels

Developers target Welsh Government's (WG) more permissive planning policies: WG decides proposals above 10MW, England & Scotland local planning authorities decide up to 50MW. Solar panels belong on brownfield sites, residential properties & commercial buildings: use existing grid connections, reduce local electricity bills and supply surplus electricity to the National Grid = less demand for grid electricity, and agricultural land (our food security) is maintained.



- Welsh Government Soil Policy & Agricultural Land Use Planning Unit 2018-19 Soil Policy Evidence Programme Feb 2020
- <https://www.gov.wales/sites/default/files/publications/2021-05/agricultural-land-classification-frequently-asked-questions.pdf>
- PEDW DNS/3245065 Welsh Minister Decision 27/10/22
- PEDW DNS/3267575 2022-12-19 REPS009WGClimateChange

CAEVOD is against overdevelopment in East Vale of Glamorgan. We support renewable energy in the right location: carbon neutrality in Wales without destroying our countryside.

# 1. Background

## 1.1. Summary

The Welsh Government has no plans to review its policy on Best and Most Versatile (BMV) agricultural land to include 3b land.

Its planning policy is to avoid development on Wales' BMV agricultural land unless there's an 'overriding need' for the development **and** there's no suitable alternative land available (see below).

BMV agricultural land is defined as grades 1, 2 and 3a of the Agricultural Land Classification (ALC) system. This is 'good' to 'excellent' quality land. 3b land is considered 'moderate' quality and has more limited capability in the range of crops that can be grown.

The Minister's letter to the Committee on this petition contains technical detail on the ALC system and soil grade characteristics.

## 1.2. Planning policy

Future Wales: The National Plan 2040 states:

Our productive land is a vital resource. Agriculture has shaped our landscapes and supported our rural and market towns for generations. We must continue to value and protect our agricultural land and ensure it can feed and support us.

Planning Policy Wales (PPW) states:

3.55 Previously developed (also referred to as brownfield) land ... should, wherever possible, be used in preference to greenfield sites where it is suitable for development.

and:

3.59 When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land [BMV agricultural 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.

### 1.3. Planning decisions

Renewable energy developments of 10 Megawatts (MW) or greater are considered Developments of National Significance (DNS). Applications for DNS are made to Planning Environment Decisions Wales (PEDW) for decision by the Welsh Ministers.

The Welsh Government introduced the *Infrastructure (Wales) Bill* into the Senedd on 12 June 2023. The Bill establishes a new consenting system for large infrastructure developments, including renewable energy developments.

The Bill, as currently drafted, raises the lower threshold for decisions by the Welsh Ministers from 10MW to 50MW meaning that should the Bill become law in its current form, renewable energy developments of below 50MW would be decided by the Local Planning Authority.

## 1.4. The Agricultural Land Classification system

The ALC system provides a method for assessing the quality of farmland in Wales and England. It classifies land into five grades, with 1 being the best and 5 being the worst and grade 3 subdivided into subgrades 3a and 3b.

The current grading methodology is described in The Agricultural Land Classification of England and Wales Revised Guidelines and Criteria for Grading the Quality of Agricultural Land (MAFF 1988).

## 2. Welsh Government action

In her letter to the Committee on this petition, the Minister for Climate Change, Julie James, notes:

- She wrote to all Local Planning Authorities in Wales in March 2022 to reiterate national planning policy on protecting BMV agricultural land. The letter was specifically in the context of development of solar photovoltaic (PV) arrays: Best and most versatile agricultural land and solar PV arrays.
- The Welsh Government intends to publish an evidence review into 'The impact of solar photovoltaic (PV) sites on agricultural soils and land quality' during the summer. The Minister says she would be pleased to share this with the Committee once published.

The Minister also confirmed she has no plans to review the policy on Best and Most Versatile (BMV) agricultural land to include subgrade 3b land.

## 3. Welsh Parliament action

This issue of including subgrade 3b land within the definition of BMV agricultural land hasn't previously been discussed in the Senedd.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.