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Y Gweinidog Newid Hinsawdd
Minister for Climate Change



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1344
Ein cyf/Our ref JJ/01466/23

Jack Sargeant MS
Chair - Petitions committee
Senedd Cymru
Cardiff Bay
Cardiff
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6 June 2023

Dear Jack Sargeant MS,

Thank you for your letter of 18 May 2023 regarding the petition from Campaign Against East Vale Over Development (CAEVOD).

Renewable energy developments of 10MW or greater are considered Developments of National Significance (DNS). Applications for DNS are made to Planning Environment Decisions Wales (PEDW) for decision by Welsh Ministers. As the Minister responsible for determining DNS applications, neither I nor my officials can comment directly on any particular scheme. To do so could leave any future decision open to challenge on the grounds of pre-determination. I therefore offer no comment on any current or future proposals.

A key message from Future Wales: The National Plan 2040 in respect of high-quality agricultural land is: -

'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'.

Future Wales makes a clear statement on the importance of high-quality agricultural land as it is considered as a *'natural national resource'* under Policy 9.

Planning Policy Wales (PPW) sets out the approach to be taken to managing our high quality or Best and Most Versatile (BMV) agricultural land. Paragraph 3.55 notes that previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Paragraph 3.59 states that BMV agricultural land should only be developed if there is an ‘overriding need’ for the development and previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value which outweighs the agricultural considerations. I recently reiterated the national planning policy position and importance I place on protecting BMV agricultural land as a finite, national resource in my letter to Chief Planning Officers, dated 1 March 2022¹.

PPW defines BMV agricultural land as grades 1, 2 and 3a of the Agricultural Land Classification (ALC) system. This is ‘good’ to ‘excellent’ quality land. As a resource, BMV land is considered to be the most flexible, productive and efficient and is most capable of delivering crops for food and non-food uses for the future. BMV agricultural land accounts for 10-15% of land in Wales.

The 10-15% range reflects some uncertainty in the Predictive Agricultural Land Classification Map. Certain site-specific limitations were not included in the production of the Map due to a lack of available data. These include frost risk, agricultural flood risk, pattern limitations, micro-relief limitations and chemical limitations. The severity of these limitations may limit some areas currently graded as predictive BMV agricultural land.

BMV land often contains lighter and easy to work soils, it requires fewer “passes” by agricultural machinery to establish seedbeds. The reduction in the amount of time machinery spends on the land helps reduce fuel, labour, and maintenance costs. It also reduces the potential for damage to soil organic matter. Horticultural and root crops grown on BMV land can also be harvested in a cleaner condition reducing loss of soil, water usage and crop wastage.

Non-BMV land tends to be made up of heavier wetter soils and those in colder wetter climatic zones which limit their workability and cropping potential.

ALC subgrade 3b accounts for an additional c.23%² of agricultural land in Wales and is considered ‘moderate’ quality. Subgrade 3b covers a very wide spectrum of land which has a much more limited capability in the range of crops that can be grown. The ALC grades definitions are published in the ‘*Revised guidelines and criteria for grading the quality of agricultural land*’ (MAFF 1988)³;

Subgrade 3b is defined as, “*land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year*”.

ALC Grades 4 & 5, ‘poor’ and ‘very poor’ quality agricultural land, tend to be found in poorly drained or upland areas limited by soil depth, wetness, gradient and climate. These grades account for c.42% of agricultural land in Wales.

The table below illustrated the latest available data on the quality of agricultural land used for solar PV sites in Wales by area (hectares). This covers the period 2012-2020 and excludes DNS permissions.

¹ <https://www.gov.wales/best-and-most-versatile-agricultural-land-and-solar-pv-arrays>

² <https://www.gov.wales/agricultural-land-quality-statistics-planning-authorities-2020>

³ <https://publications.naturalengland.org.uk/file/5526580165083136>

| Grade 1 | | Grade 4 | |
|------------|----|----------|----|
| Area | % | Area | % |
| 0 | 0 | 254.8 | 17 |
| Grade 2 | | Grade 5 | |
| Area | % | Area | % |
| 268.1 | 18 | 116.3 | 8 |
| S'grade 3a | | Non-agri | |
| Area | % | Area | % |
| 202.4 | 13 | 15.6 | 1 |
| S'grade 3b | | Urban | |
| Area | % | Area | % |
| 660.8 | 43 | 3 | 0 |

The Welsh Government continues to ensure the Agricultural Land Classification System is fit for purpose. This includes the publication of the Agricultural Land Classification Technical Review report series:

[ALC Technical Review - Part 1 - Soil and Site Limitations](#)

[ALC Technical Review - Part 2 - Climate, Site and Interactive Limitations](#)

[ALC Technical Review - Part 3 - Droughtiness](#)

[ALC Technical Review - Part 4 - Chemical Limitations](#)

[ALC Technical Review - Part 4 - Soil Wetness](#)

[ALC Technical Review - Part 6 - Scoping Study](#)

Over the summer, Welsh Government will publish an evidence review into '*The impact of solar photovoltaic (PV) sites on agricultural soils and land quality*,' Report Code: SPEP2021-22/03. The report is in translation, and I would be pleased to share it with the Committee once published.

The development of BMV and non-BMV agricultural land and soils is identified in Planning Policy Wales⁴, Technical Advice Note 6⁵, Practice Guidance Planning Implications of Renewable and Low Carbon Energy⁶, and Future Wales, the National Plan 2040⁷. The Welsh Government supports the principle of developing renewable and low carbon energy from all technologies and at all scales. Future Wales policies 17 and 18 set out the Welsh Government's policies for renewable and low carbon energy development, including the key criteria for the determination of DNS. These key criteria ensure that applications for DNS are rigorously assessed so that communities, designated areas, landscapes and natural resources are protected from unacceptable adverse impacts. Policy 18 also requires consideration of the cumulative impacts of existing and consented renewable energy schemes where this is appropriate as well as the provision for '*...effective restoration*'.

⁴ https://www.gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf

⁵ <https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities>

⁶ [Practice Guidance Planning Implications of Renewable and Low Carbon Energy \(gov.wales\)](#)

⁷ <https://www.gov.wales/sites/default/files/publications/2018-09/planning-implications-renewable-low-carbon-energy-development.pdf>

I can confirm that there are no plans to review the policy on Best and Most Versatile (BMV) agricultural land to include Subgrade 3b land.

Yours sincerely,

A handwritten signature in blue ink that reads "Julie James". The signature is written in a cursive, flowing style.

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