LOCAL PLAN REVIEW

AGRICULTURAL LAND ASSESSEMENT

SUPPLEMENTARY PAPER





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1. Introduction

1.1. This assessment considers the potential loss of the 'best and most versatile' land that may arise through allocations in the Local Plan Review. There are five grades of agricultural land, with Grade 3 subdivided into 3a and 3b. The best and most versatile agricultural land is defined as Grades 1, 2 and 3a. Planning policies and decisions should take account of the economic and other benefits of the best and most versatile agricultural land.

2. Policy background

- 2.1. The preservation of productive agricultural land has long been enshrined within the planning system. The Government's 25 Year Environment Plan¹ reiterates its commitment to protecting high quality agricultural land.
- 2.2. Paragraph 174 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by, amongst other things, recognising the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land. The NPPF also adds that plans should; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework. Further guidance is provided at footnote 58 of page 50 of the NPPF which states 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".
- 2.3. Planning Practice Guidance Planning requires that policies and decisions should take account of the economic and other benefits of the best and most versatile agricultural land.²

3. Methodology

- Objective 9 of the Sustainability Appraisal assessed the overall spatial strategy for its impact on soils, including its impact on the best and most versatile agricultural land.
- 3.2. The Strategic Land Availability Assessment considered agricultural land grades as a criteria for the selection process for sites, and where possible, sites that would have neutralised the best and most versatile agricultural land were avoided.
- 3.3. In order to consider agricultural land on a more detailed level and to assess the implications of allocations, a desk-based assessment was

¹ HM Government, A Green Future: Our 25 Year Plan to Improve the Environment (2018)

² Paragraph: 001 Reference ID: 8-001-20190721

undertaken in order to assess the loss of the best and most versatile agricultural land. Agricultural Land Classification data was first cross checked against data held in the DEFRA Magic Map tool to ensure the comprehensiveness of base data. Using GIS, polygons for those sites put forward in the Local plan review were plotted against the agricultural land classification layer to determine the percentage of each site that fall within the best and most versatile land categories.

- 3.4. Reliance has been made on pre 1988 Agricultural land Classification on the basis that this provides the most comprehensive assessment which covers the whole of the borough. Whilst some more recent surveys have been undertaken for the borough, these are mostly drawn from site assessments undertaken in support of planning applications. Accordingly, few of these later assessments relate to sites that have come forward for promotion in the Local Plan Review. There is a total of six sites where more recent agricultural land assessments are available for parts of the site, and where this is the case the updated survey data has been used.
- 3.5. For the sites where reliance is made on older classifications, the pre 1988 classification ranges from grade 1 to grade 5 but do not distinguish between class 3a and 3b. Applying a precautionary approach, any class 3 land identified has been classed as being the best and most versatile agricultural land.
- 3.6. In order to assess how collectively the sites impacted on the overall agricultural land availability in the borough, GIS was utilised to provide total land lost within each grade, which was then compared to the availability of that grade across the borough.

4. Impact Assessment

4.1. Table 1 presents the assessment of agricultural land types on a site by site basis, providing the outputs in both hectares and percentage of the site attributed to each grade. Table 2 provides the Maidstone level total for all grades, along with the loss per grade on a percentage basis and the total loss by grade.

Table 1 – Site analysis

| Site | Total site | | Grade 1 | | Grade 2 | | Grade 3 or 3a | | Grade 3b | | Urban/4/5 | |
|-----------|------------|--------------------------------------|---------|--------------|---------|--------------|---------------|--------------|----------|--------------|-----------|--------------|
| reference | area (ha) | | % | Area (ha) | % | Area (ha) | % | Area (ha) | % | Area (ha) | % | Area (ha) |
| LPRSA066 | 4.24 | Land east of Lodge Rd | | 0.00 | | 0.00 | | 0.00 | 60.00 | 2.54 | 40.00 | 1.70 |
| LPRSA078 | 2.78 | Haven Farm | | 0.00 | 33.00 | 0.92 | 67.00 | 1.86 | | 0.00 | | 0.00 |
| LPRSA101 | 3.15 | Land south of A20 | | 0.00 | 100.00 | 3.15 | | 0.00 | | 0.00 | | 0.00 |
| LPRSA114 | 3.35 | Land at Home Farm | | 0.00 | | 0.00 | 100.00 | 3.35 | | 0.00 | | 0.00 |
| LPRSA136 | 3.46 | Keilen Manor | | 0.00 | | 0.00 | 100.00 | 3.46 | | 0.00 | | 0.00 |
| LPRSA144 | 0.11 | High St/ Medway St | | 0.00 | | 0.00 | | 0.00 | | 0.00 | 100.00 | 0.11 |
| LPRSA145 | 1.06 | Len House | | 0.00 | | 0.00 | | 0.00 | | 0.00 | 100.00 | 1.06 |
| LPRSA146 | 1.57 | Maidstone East | | 0.00 | | 0.00 | | 0.00 | | 0.00 | 100.00 | 1.57 |
| LPRSA147 | 0.40 | Gala Bingo & Granada House | | 0.00 | | 0.00 | | 0.00 | | 0.00 | 100.00 | 0.40 |
| LPRSA148 | 6.87 | Maidstone Riverside | | 0.00 | | 0.00 | | 0.00 | | 0.00 | 100.00 | 6.87 |
| LPRSA149 | 2.07 | Maidstone West | | 0.00 | | 0.00 | | 0.00 | | 0.00 | 100.00 | 2.07 |
| LPRSA151 | 0.30 | Mote Road | | 0.00 | | 0.00 | | 0.00 | | 0.00 | 100.00 | 0.30 |
| LPRSA152 | 0.29 | Former Royal British Legion Site | | 0.00 | | 0.00 | | 0.00 | | 0.00 | 100.00 | 0.29 |
| LPRSA172 | 10.88 | Land at Sutton Road | | 0.00 | 100.00 | 10.88 | | 0.00 | | 0.00 | | 0.00 |
| LPRSA204 | 0.57 | Land south east of Eyhorne Street | | 0.00 | | 0.00 | 100.00 | 0.57 | | 0.00 | | 0.00 |
| LPRSA248 | 9.93 | North of Kenward Rd | | 0.00 | 17.20 | 1.71 | 82.80 | 8.22 | | 0.00 | | 0.00 |
| LPRSA251 | 0.19 | Land at Heath Road | | 0.00 | | | 100.00 | 0.19 | | 0.00 | | 0.00 |
| LPRSA260 | 0.78 | Ashford Road | | 0.00 | 100.00 | 0.78 | | 0.00 | | 0.00 | | 0.00 |
| LPRSA265 | 30.99 | Land at Abbey Farm | | 0.00 | 98.31 | 30.46 | 1.69 | 0.52 | | 0.00 | | 0.00 |
| LPRSA266 | 4.17 | North of Ware St | | 0.00 | 100.00 | 4.17 | | 0.00 | | 0.00 | | 0.00 |
| LPRSA270 | 43.54 | Land south of Police HQ | | 0.00 | 97.16 | 42.31 | | 0.00 | | 0.00 | 2.84 | 1.24 |

| LPRSA295 | | Land north of Copper | | | | | | | | | | |
|----------|--------|------------------------|------|-------|--------|--------|--------|--------|-------|-------|--------|--------|
| LPNSA293 | 3.91 | Ln | | 0.00 | | 0.00 | 100.00 | 3.91 | | 0.00 | | 0.00 |
| LPRSA303 | 0.87 | IS Oxford Rd | | 0.00 | | 0.00 | | 0.00 | | 0.00 | 100.00 | 0.87 |
| LPRSA310 | 7.19 | Land at Mote Rd | | 0.00 | | 0.00 | 45.00 | 3.24 | 55.00 | 3.96 | | 0.00 |
| LDDCA242 | | Land north of Heath | | | | | | | | | | |
| LPRSA312 | 10.18 | Road | | 0.00 | 100.00 | 10.18 | | 0.00 | | | | 0.00 |
| LPRSA314 | 2.05 | Land east of Albion Rd | | 0.00 | | 0.00 | 100.00 | 2.05 | | 0.00 | | 0.00 |
| LPRSA360 | 1.21 | Campfield Farm | | 0.00 | 100.00 | 1.21 | | 0.00 | | 0.00 | | 0.00 |
| LPRSA362 | 5.36 | Police HQ, Sutton Rd | | 0.00 | | 0.00 | | 0.00 | | 0.00 | 100.00 | 5.36 |
| LPRSA364 | 0.36 | Kent Ambulance HQ | | 0.00 | | 0.00 | 100.00 | 0.36 | | 0.00 | | |
| LPRSA366 | 0.65 | Springfield Tower | | 0.00 | | 0.00 | | 0.00 | | 0.00 | 100.00 | 0.65 |
| | 561 | Heathlands | 2.85 | 16.00 | 19.54 | 109.64 | 74.69 | 419.00 | 2.76 | 15.50 | | |
| | 128.41 | Lidsing | | | | | 100.00 | 128.41 | | | | |
| | 776 | Leeds Langley | | | 68.56 | 532.00 | 14.24 | 110.50 | 4.90 | 38.00 | 12.35 | 95.80 |
| | | Total | | 16.00 | | 747.41 | | 685.64 | | 60.00 | | 118.30 |

Table 2 – Maidstone Totals

| Consider | A | Heatene | Total loss by | 0/ 1 |
|------------------|----------------|-----------|---------------|--------|
| Grade | Area m2 | Hectares | grade | % loss |
| Grade 1 | 6,106,250.55 | 610.63 | 16.00 | 2.62 |
| Grade 2 | 107,233,095.06 | 10,723.31 | 747.41 | 6.97 |
| Grade 3/3a | 236,572,401.88 | 23,657.24 | 685.64 | 2.90 |
| Total Grade 1-3 | 349,911,747.49 | 34,991.18 | 1,449.05 | 4.14 |
| Grade 3b/4/5 | | | | |
| Urban | 7,664,102.83 | 4,206.61 | 178.30 | 4.24 |
| Maidstone Totals | 391,977,814.07 | 39,197.79 | | |

5. Conclusions

- 5.1. The method for allocating sites in the Local Plan Review has followed a sequential approach, testing the suitability of the sites across a range of indicators, including the quality of agricultural land.
- 5.2. The results of the above analysis demonstrate that land in grades 1-3a would be lost as a result of development, however it is nevertheless important to view this within the context of overall availability of the best and most versatile agricultural land.
- 5.3. Whilst it is clear that in pursuing a growth strategy an LPA must give consideration to preserving the best and most versatile agricultural land, the NPPF doesn't define what 'significant' means in terms of loss. Therefore, to contextualise this in broader terms MBC has assessed whether loss through allocations is significant within the context of Maidstone Borough.
- 5.4. The overall spatial strategy has been assessed thought the Sustainability Appraisal which considered the impact of spatial options on the best and most versatile agricultural land. The plan has sought to maximise the capacity of brownfield land in the borough and therefore a significant proportion of development lies on land that is not classified for agricultural use.
- 5.5. The Strategic Land Availability Assessment considered sites against a range of factors, one of which was whether or not the development of a site would sterilise grade 1-3 agricultural land. Whilst agricultural land grade was not a reason in its own right to reject a site, particularly where that site scored highly on other measures of suitability and sustainability, the agricultural land grade was a factor in the final site selection.
- 5.6. Whilst Maidstone does have areas of higher agricultural land value, and some sites will sterilise some of this land, opportunities presented from developing these sites outweigh the impact on the best and most versatile agricultural land. Additionally, in Maidstone, the best and most versatile land is located closer to areas of existing high populations, such as the edge of Maidstone, with lower grades located in more rural, less sustainable locations.
- 5.7. Given the number of sites in the plan we have kept those within BMV land to a minimum. In total the Local Plan Review would see the loss of around 4.1% of the overall total best and most versatile land in the borough. It should however be noted that a significant proportion of this arises from the Leeds-Langley corridor, which amounts to 1.8% of the total 4.1% loss. This is a broad area of growth which will not be developed in full, and therefore the overall loss is showing as disproportionately higher than it would be with individual allocations.

5.8. In pursuing a sustainable pattern of growth, it is inevitable that in some instances this growth will take place on land in grades 1-3/3a. This study demonstrates that MBC has considered the quality of agricultural land in its strategy and allocations to ensure that the loss of the best and most versatile agricultural land would be minimised in accordance with paragraph 174 of the NPPF.