



# Proof of Evidence

On behalf of  
Stop the West Midlands Interchange

## 7. AGRICULTURE & FARMING IMPACT REPORT

In respect of the proposed West Midlands  
Interchange



# Strategic Rail Freight Interchange

## Introduction.

This evidence has been prepared by a local community group opposed to the West Midlands Interchange at Gailey, Four Ashes and Calf Heath in South Staffordshire. The community group was set up to represent the views of local residents. The group comprises of professional experts and local residents. It also has local political support from Gavin Williamson (South Staffordshire MP) and Jeremy Lefroy (Stafford MP).

‘Stop the West Midlands Interchange’ currently has over 2500 members from the neighbouring communities that will be directly or indirectly affected by the proposed development, these include the communities of Gailey, Four Ashes, Calf Heath, Hatherton, Penkridge, Brewood & Coven.

We do not propose to repeat the objections made by the professional bodies, local authorities and political leaders we are merely seeking to offer a local perspective and provide our own views on this proposal, which is supported by evidence and professional experts.

This report focuses on the impact on agriculture and farming that this development will have at this location.

This report should be read in conjunction with the other reports being prepared by the Group on the following matters:-

- Planning and Green Belt;
- Railway Infrastructure;
- Highways;
- Health
- Environment & ecological issues;
- Tourism / recreational issues;
- Location;
- Supporting Information; and
- Answers to the Inspector’s Questions.

## Strategic Rail Freight Interchange

### SUMMARY OF OUR OBJECTIONS

#### Agriculture

- **NPSNN 5.168 Applicants should take into account the economic and other benefits of the best and most versatile grade 1,2,2a agricultural land. Applicants should seek to use areas of poorer quality land. The proposed development will result in significant loss of grade 2 & 3 agricultural land.**
- **Draft Planning Statement 2017 ALC Table 6. The land quality classification for the application site is predominantly Grade 2 and 3, arable land providing crops such as potatoes, wheat and barley. The Agricultural Bill 2017-19, the NFU says the Bill should: promote the Nation's strategic priorities by supporting domestic agriculture to ensure food security.**
- **We can find no evidence that the applicants have considered in their sequential assessment whether a site of best and most versatile agricultural land has been used to appraise the merits of alternative sites. This is considered to be an important oversight, which raises further doubts about the robustness of the applicants sequential assessment.**
- **The applicant has failed to recognise the expectation set out in the NPSNN to seek to develop land of poorer quality in preference to higher quality land where a need to develop significant areas of agricultural land is identified.**
- **The applicant has failed to consider alternative poorer agricultural areas.**
- **The applicant has failed to consider the NFU and the Agriculture Bill 2017-19 and the essential ingredients for a progressive, profitable and sustainable food and farming sector post Brexit. In response to the introduction of the Agriculture Bill to Parliament on 12th September 2018, NFU President Minette Batters said "It is vital in the future British farmers can continue to meet the food needs of a growing population. A future agricultural policy that ignores food production will be damaging for farmers and the public alike. We are entering an historic period of farming setting the path for the next generation of farmers and the countryside."**

# Strategic Rail Freight Interchange

## **7. AGRICULTURE & FARMING IMPACT REPORT**

### **1.0 AGRICULTURAL IMPACT**

1.1 The proposed development will result in the significant loss of grade 2 and 3 agricultural land. Land within grade 2 and 3 is defined as being some of the best and most versatile agricultural land, which is contrary to Government Policy; as set out in the National Policy Statement for National Networks (NPSNN).

This is because soil is an essential finite resource that provides important ecosystem services', for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution.

### **2.0 Loss of Best and Most Versatile Land**

2.1 As stated in NPSNN

5.168 Applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality. Applicants should also identify any effects, and seek to minimise impacts, on soil quality, taking into account any mitigation measures proposed. Where possible, developments should be on previously developed (brownfield) sites provided that it is not of high environmental value. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination and how it is proposed to address this.

2.2 Land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non-food crops for future generations. Natural

## Strategic Rail Freight Interchange

England has a statutory role in advising local planning authorities about land quality issues.

Therefore, the impact from the loss of the best and most versatile agricultural land should be viewed in light of:

- the need for the development of agricultural land, and the opportunities for using poorer quality agricultural land in preference to higher quality land
- the continued availability of soil resources (and the ecosystem services they provide) for future generations.

2.3 The agricultural land quality classification for the application site is predominantly Grade 3. The majority of the land is arable land and provides crops such as: Potatoes; Wheat and Barley (see photographs), as well as grazing for sheep and other livestock.

2.4 The criteria for the Agricultural Land Classification grades are based on Climate (temperature, rainfall, aspect, exposure and frost risk), Site characteristics (gradient, microrelief and flood risk) and Soil properties (texture, structure, depth, stoniness and chemical properties that cannot be corrected). These factors contribute to the potential range, yield, consistency and cost of crops that can be grown and so higher grades have greater versatility with respect to these aspects.

2.5 The 1988 MAFF guidance is still the relevant document that sets out the criteria for grading the quality of agricultural land. The guidance concludes that adopting an economic criteria is problematic due to variable crop yield data, management skill, weather factors and land value. Therefore, the Agricultural Land Classification System is based only on physical characteristics. It is therefore difficult to 'take account of the economic benefits of the best and most versatile land' as this information is likely to come from the landowners whom are promoting their sites for development.

## Strategic Rail Freight Interchange

### **3.0 The supporting documentation prepared on behalf of the applicant does not consider the economic impacts of the loss of agricultural land.**

3.1 Agriculture Bill 2017-19 – currently at Report Stage – “The NFU has urged the government to make the Agriculture Bill truly agricultural by ensuring food production is at its heart.” “The NFU says the Bill should: Promote the nations strategic priorities by supporting domestic agriculture to ensure food security. “  
“Value and protect British farming’s high production, animal welfare and environmental standards.”

Ref: nfuonline.com The Agriculture Bill – all the information in one place.

3.2 It is not accepted that the benefits of economic growth outweigh the economic benefits of ‘best and most versatile agricultural land’ or the loss of valuable landscape.

3.3 We can find no evidence that the applicant has considered in a sequential assessment whether a site of best and most versatile agricultural land has been used to appraise the merits of alternative sites. This is considered to be an important oversight, which raises further doubts about the robustness of the applicants’ sequential assessment. We believe that there are alternative sites which are of poorer quality agricultural land that may be capable of accommodating the proposed development.

# Strategic Rail Freight Interchange

## **4.0 Impact on Soil Quality**

4.1 The applicant has failed to identify any effects, and does not seek to minimise impacts, on soil quality, taking into account any mitigation measures proposed. Where possible, developments should be on previously developed brownfield sites provided that it is not of high environmental value. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination and how it is proposed to address this (re Model Procedures for Management of Land Contamination (CLR11));

4.2 As part of the Government's 'Safeguarding our Soils' strategy, Defra has published a code of practice on the sustainable use of soils on construction sites, which may be helpful in development design and setting planning conditions"

4.3 Askew Land & Soil Ltd found that the Potential Demolition, Construction and Completed Development Impacts could:

- Affect topsoil and subsoil resources;
- Affect/and or seal over land currently in agricultural use;
- Result in loss of one or more agricultural holdings, including loss of on-site agricultural land.



## Strategic Rail Freight Interchange





# Strategic Rail Freight Interchange



## Strategic Rail Freight Interchange

(Pictures from Gailey and Calf Heath, Captured between June 2016- November 2018)



## Strategic Rail Freight Interchange

### **5. Conclusion**

The applicant has failed to recognise the expectation set out in the NPSNN to seek to develop land of poorer quality in preference to higher quality land where a need to develop significant areas of agricultural land is identified.

The applicant has failed to consider alternative poorer agricultural areas.

The applicant has failed to consider the NFU and the Agriculture Bill 2017-19 and the essential ingredients for a progressive, profitable and sustainable food and farming sector post Brexit. In response to the introduction of the Agriculture Bill to Parliament on 12<sup>th</sup> September 2018, NFU President Minette Batters said “It is vital in the future British farmers can continue to meet the food needs of a growing population. A future agricultural policy that ignores food production will be damaging for farmers and the public alike. We are entering an historic period of farming setting the path for the next generation of farmers and the countryside.”