



March 2025

Mactaggart and Mickel Strategic Land

**Land between Lodge Road and Tape Lane, Hurst,
RG10 0EG**

Agricultural Land Considerations

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Contents

1 INTRODUCTION.....1

2 AGRICULTURAL LAND CLASSIFICATION2

3 RELEVANT POLICIES.....5

4 APPRAISAL.....6

5 SUMMARY9

1 Introduction

1.1 Reading Agricultural Consultants Ltd (RAC) is instructed by Mactaggart and Mickel Strategic Land to consider the effect of the proposed development on land between Lodge Road and Tape Lane, Hurst on agricultural land quality, in particular on the best and most versatile (BMV) agricultural land.

1.2 Outline application reference 242067 for *“for the proposed erection of up to 99 no. dwellings, green infrastructure, open space, pedestrian and cycle links, recreational facilities and other associated infrastructure and access points on Lodge Road and Tape Lane with required improvements. (All matters reserved except for means of access)”* was refused by Wokingham Borough Council on 29th November 2024 for eleven reasons.

1.3 Reason for refusal number 2 states that:

“The application results in the loss of an area of Best and Most Versatile agricultural land contrary to Core Strategy policy CP1 and section 15 of the NPPF.”

1.4 Application 242067 followed an earlier application 220458 for approximately 200 homes on the same site which was dated 16 February 2022 and refused on 23 June 2022. One of the reasons for refusing that application also related to the loss of BMV agricultural land. The decision was appealed (APP/X0360/W/22/3309202) and the appeal dismissed on 8 March 2023.

1.5 This report:

- describes the background to the Agricultural Land Classification (ALC) system;
- summarises the results of the survey undertaken;
- sets out relevant policies for development involving agricultural land; and
- appraises the proposed development of the site against these policies.

2 Agricultural Land Classification

- 2.1 Guidance for assessing the quality of agricultural land in England and Wales is set out in the Ministry of Agriculture, Fisheries and Food (MAFF) revised guidelines and criteria for grading the quality of agricultural land¹, and summarised in Natural England's Technical Information Note (TIN) 049².
- 2.2 Agricultural land in England and Wales is graded between 1 and 5, depending on the extent to which physical or chemical characteristics impose long-term limitations on agricultural use. The principal physical factors influencing grading are climate, site conditions and soil which, together with interactions between them, form the basis for classifying land into one of the five grades.
- 2.3 Grade 1 is excellent quality agricultural land with very minor or no limitations to agricultural use. Grade 2 is very good quality agricultural land, with minor limitations which affect crop yield, cultivations or harvesting. Grade 3 land has moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield, and is subdivided into Subgrade 3a (good quality land) and Subgrade 3b (moderate quality land). Grade 4 is poor quality agricultural land with severe limitations which significantly restrict the range of crops and/or level of yields. Grade 5 is very poor quality land, with very severe limitations which restrict use to permanent pasture or rough grazing.
- 2.4 Land which is classified as Grades 1, 2 and 3a in the ALC system is defined in Annex 2 of the National Planning Policy Framework (NPPF³) as BMV agricultural land.
- 2.5 The site is shown on the Provisional ALC map as undifferentiated good to moderate quality Grade 3 agricultural land, which is described in the ALC guidelines as:

“Land with moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in Grades 1 and 2.”

¹ **MAFF (1988).** *Agricultural Land Classification of England and Wales. Revised guidelines and criteria for grading the quality of agricultural land.*

² **Natural England (2012).** *Technical Information Note 049 - Agricultural Land Classification: protecting the best and most versatile agricultural land*, Second Edition.

³ **Ministry of Housing, Communities and Local Government (20242).** *National Planning Policy Framework.*

- 2.6 However, the Provisional ALC map is not suitable for assessing the quality of individual sites, as explained in Natural England's TIN049:

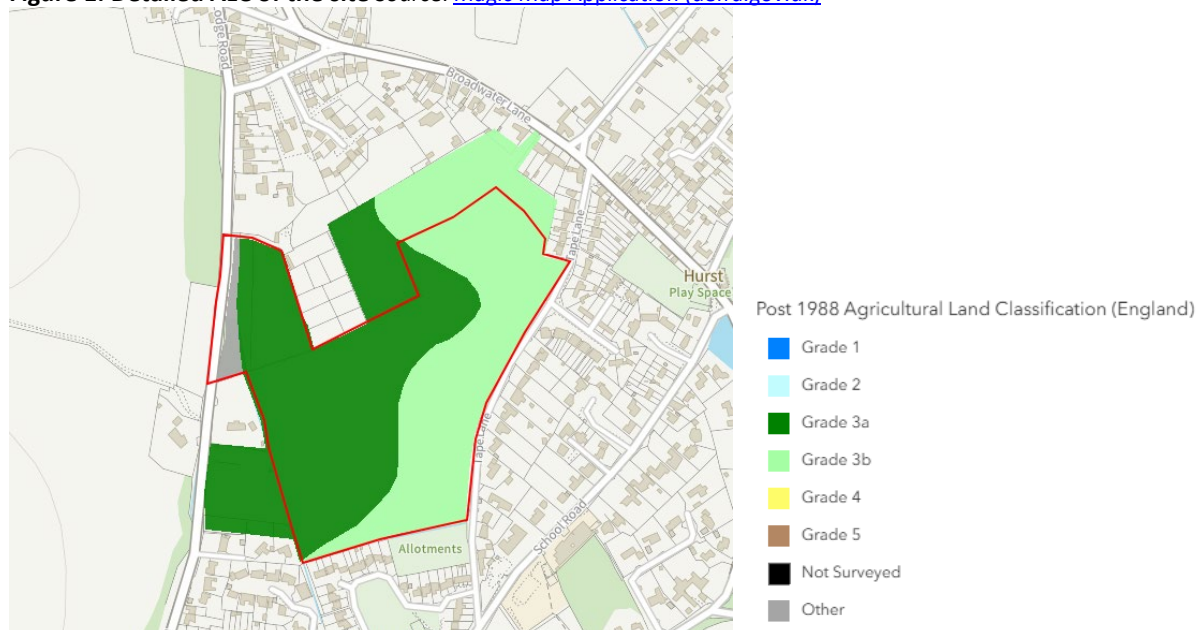
"These maps are not sufficiently accurate for use in assessment of individual fields or development sites, and should not be used other than as general guidance. They show only five grades: their preparation preceded the subdivision of Grade 3 and the refinement of criteria, which occurred after 1976. They have not been updated and are out of print. A 1:250 000 scale map series based on the same information is available. These are more appropriate for the strategic use originally intended ..."

- 2.7 TIN049 goes on to say:

"Since 1976, selected areas have been resurveyed in greater detail and to revised guidelines and criteria. Information based on detailed ALC field surveys in accordance with current guidelines (MAFF, 1988) is the most definitive source. Data from the former Ministry of Agriculture, Fisheries and Food (MAFF) archive of more detailed ALC survey information (from 1988) is also available on <http://magic.defra.gov.uk/>."

- 2.8 The site (and adjacent land) was surveyed in detail in 1996 by ADAS⁴ on behalf of MAFF in connection with the Wokingham District Local Plan. The classification of the site is shown below in Figure 1.

Figure 1: Detailed ALC of the site Source: [Magic Map Application \(defra.gov.uk\)](http://magic.defra.gov.uk/)



⁴ **ADAS (1996).** *Wokingham District Local Plan, Sites SA03/SA04/SA05, Hurst, Berkshire.* ADAS Reference: 0206/169/95. MAFF Reference: EL 02/01176

- 2.9 Within the current site area of 10.7ha, an area of 5.6ha (52%) in the west was classified as Subgrade 3a (dark green), with 4.6ha (43%) in the east classified as Subgrade 3b (light green), and 0.5ha (5%) along the western boundary shown as non-agricultural land.
- 2.10 The Subgrade 3a land was classified on the basis of both soil droughtiness and soil wetness limitations. Soil profiles have medium sandy loam or medium clay loam topsoils which are very slightly to slightly stony (1-10% total hard stones).
- 2.11 There are two separate Subgrade 3a soils within the current site: the first is where deep profiles occur with medium sandy loam or medium clay loam upper subsoils passing into loamy sand or sandy clay loam or clay, with loamy sand or medium sand at depth. This land is well to imperfectly drained and is limited by soil droughtiness.
- 2.12 The second type contains very slightly stony, medium clay loam or sandy clay loam upper subsoils, which sometimes pass into stoneless, loamy medium sand lower subsoils, and overlie slowly permeable clay horizons. These soils are classified on the basis of a soil wetness limitation.
- 2.13 The Subgrade 3b land in the east contains slightly stony (8% hard stones), medium sandy loam topsoils over gleyed upper subsoils which have similar textures and stone contents. Lower subsoils are moderately stony, sandy clay loams (30% total hard stones), which become very stony and pass into gravel at approximately 75cm depth. These soils are limited by soil droughtiness to Subgrade 3b.
- 2.14 The survey report also notes that high groundwater in the shallow soils over gravels in the east of the site gives rise to the pools of surface water observed at the time of survey (February, when the water table is expected to be approaching its highest level), which are also evident from Google Earth images for both the Subgrade 3a and the Subgrade 3b land shown in Figure 2.

Figure 2: Google Earth 2014



Google Earth 2021



2.15 Nevertheless, as the ALC system is concerned with the long-term inherent physical characteristics of land and soil, rather than the short-term use or management, the results obtained in 1996 remain valid and the classification will not have changed in the interim.

2.16 The classification of the site was not in dispute at the 2023 appeal.

3 Relevant Policies

3.1 Paragraph 187 of the NPPF indicates that planning policies and decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing soils; and
- recognising, amongst other matters, the wider benefits from natural capital and ecosystem services, including the economic and other benefits of BMV agricultural land.

3.2 Paragraph 188 goes on to state that plans should allocate land with the least environmental or amenity value, where consistent with other policies in the NPPF, and footnote 65 explains 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.

3.3 Policy CP1 of the Wokingham Core Strategy (2010) indicates that planning permission will be granted for development proposals that, amongst other matters, *“avoid areas of best and most versatile agricultural land.”*

3.4 No further guidance on development involving agricultural land is provided in the Core Strategy.

3.5 The Inspector at the 2023 appeal (paragraph 71) noted that Policy CP1 is not in full accordance with the NPPF and therefore gave this aspect of the policy reduced weight.

4 Appraisal

- 4.1 The proposed development would involve the loss of 5.6ha of BMV land in Subgrade 3a. National policy does not preclude the loss of BMV land but indicates that decisions should recognise the economic and other benefits of BMV agricultural land.
- 4.2 In this case, the economic benefits of BMV land are very limited. The site is farmed as a single block of approximately 10ha in the same management regime, with no differentiation between the Subgrade 3a and the Subgrade 3b land.

- 4.3 As noted at paragraphs 67 and 68 of the 2023 decision letter:

“Some farming activity was undertaken on the land in the 1970s and early 1980s, including cereal production, growing grass for silage and hay, and grazing by cattle and horses but the appellant’s evidence in that none of these activities could successfully be carried out, largely because of difficulties with trespass and vandalism. As a result, farming activities ceased and the land has been grazed by about 30 horses, ponies and donkeys in the past 40 years, with the occasional cattle also grazed.”

“The farmer has confirmed that the site suffers from surface ponding following heavy rainfall, and states that this water retention is a clear limitation to the possible agricultural use of the land. Arable cropping is also limited due to the enclosure size and the short working lengths. As such, the appellant maintains that the agricultural use of, and benefit from, the land is very limited.”

- 4.4 Although the Council maintained that it would be possible to grow crops on the land and that BMV land has an even greater importance now, the Inspector concluded at paragraph 72:

“I consider that the appellant has undertaken a far more rigorous and detailed assessment of the potential agricultural or horticultural uses of the land than has the Council, and I therefore give the appellant’s position and conclusions more weight. It seems clear that viability is a key issue, and whilst the potential of BMV agricultural land is recognised, there is no strong evidence to indicate any likelihood of an agricultural use starting up again on this land.”

- 4.5 However, the Inspector also recognised in paragraph 72 that times change and that, if the development were to proceed, the 5.6ha of BMV land would be lost for any future agricultural use. He therefore concluded that the loss of the 5.6ha of BMV land would be a disbenefit of the proposed development but should only carry modest weight against the proposal.

4.6 The ALC guidelines describe good quality Subgrade 3a land as:

“Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops.”

4.7 The expectation is that Subgrade 3a land should be capable of producing arable crops. It is also clear from the evidence presented to the 2023 appeal and accepted by the Inspector that the land is not capable of consistently producing either a narrow range of arable crops to moderate to high yields, or a wider range of crops to moderate yields. The land cannot therefore achieve its inherent potential.

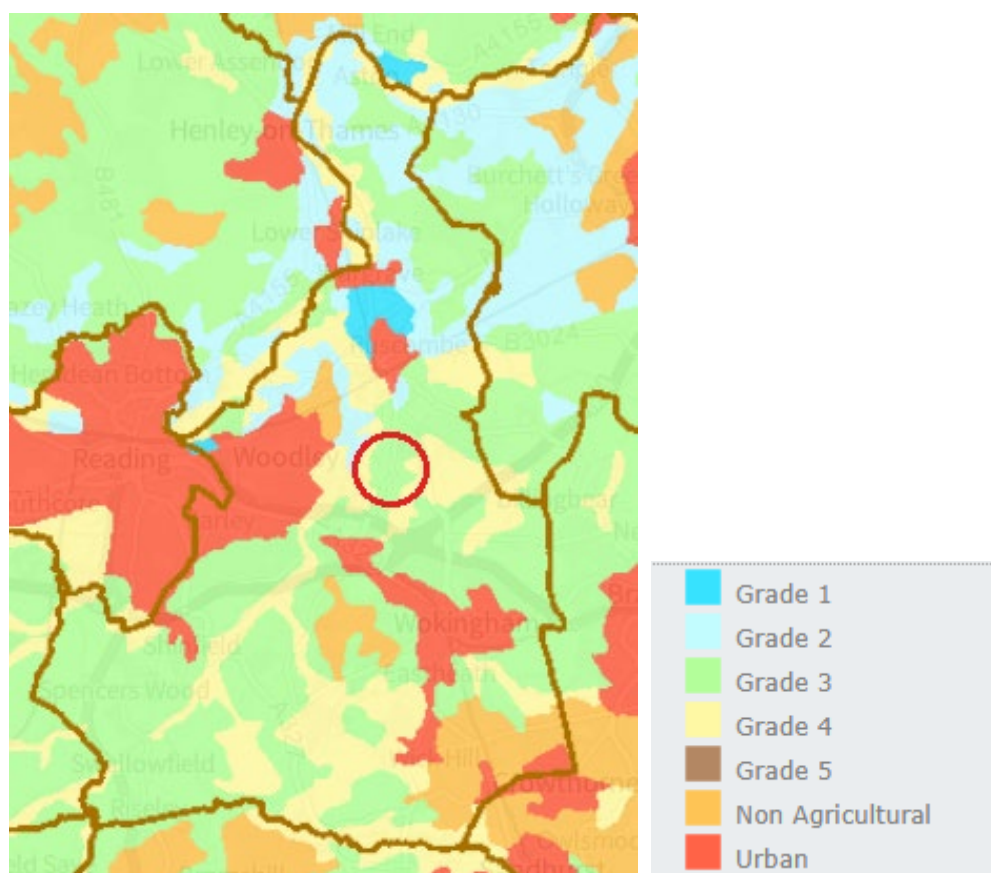
4.8 Subgrade 3b land is described as:

“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.”

4.9 This description is a more accurate reflection of the current and historic land use at the site. Although 5.6ha is inherently of Subgrade 3a quality, the whole site is and has been managed as Subgrade 3b. There are therefore considered to be no economic or other benefits arising at this site by virtue of it containing land of BMV quality.

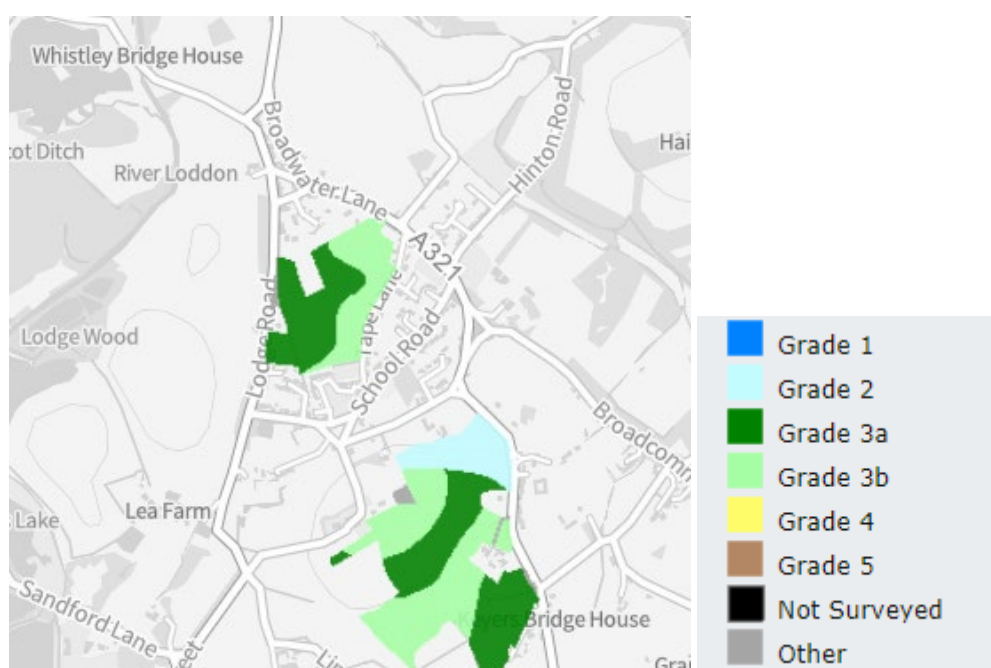
4.10 Core Strategy policy seeks to avoid areas of BMV agricultural land (although, as noted by the 2023 Inspector, this is not consistent with the NPPF). The Provisional ALC mapping reproduced for Wokingham District in Figure 3 shows a prevalence of Grade 3 land surrounding Hurst, with Grade 4 at some distance associated with lower-lying land and floodplains. Better quality land in Grades 1 and 2 is provisionally mapped further north.

Figure 3: Extract from the Provisional ALC map for Wokingham (approximate location of Hurst circled in red)
Source: [Magic Map Application \(defra.gov.uk\)](https://magic.defra.gov.uk/)



4.11 Detailed ALC data is available for another site to the south of Hurst. The survey classified 5 ha (16%) as Grade 2; 11.8 ha (39%) as Subgrade 3a; and 14 ha (45%) as Subgrade 3b, as shown in Figure 4 (along with the ALC of the Lodge Road site).

Figure 4: Detailed ALC data at Hurst Source: [Magic Map Application \(defra.gov.uk\)](https://magic.defra.gov.uk/)



- 4.12 The lowest quality agricultural land that is theoretically available in the locality of Hurst, that provisionally mapped as Grade 4, is functional floodplain and is therefore not suitable for development.
- 4.13 Detailed soil survey has shown the areas provisionally mapped in this locality as Grade 3 to comprise roughly equal proportions of Subgrade 3a and Subgrade 3b quality land, with additional Grade 2 quality confirmed to be present to the south of Hurst.
- 4.14 It is therefore evident that it is not possible to avoid BMV land in meeting local development needs around Hurst and that, of the known ALC, the site east of Lodge Road represents the lowest quality available.

5 Summary

- 5.1 The site extends to 10.7ha of which 10.2ha is grassland, which has been used for grazing horses, ponies and donkeys, and occasionally cattle for the past forty years.
- 5.2 The site is provisionally mapped as Grade 3 agricultural land. Detailed ALC survey has classified the site as 5.6ha of Subgrade 3a and 4.6ha of Subgrade 3b.
- 5.3 Planning permission for development of the site was refused in November 2024. Reason for refusal no.2 concerned the loss of an area of BMV quality in Subgrade 3a.
- 5.4 National policy does not preclude the loss of BMV land but indicates that decisions should recognise the economic and other benefits of BMV agricultural land. In this case, the economic benefits of BMV land are, and have been, very limited. The site is farmed as a single block with no differentiation in management between the Subgrade 3a and the Subgrade 3b land, and the land managed in accordance with the lowest grade present. The land has not been able to achieve the land uses and yields expected of Subgrade 3a land.
- 5.5 The 2023 Inspector accepted that there is little likelihood of an agricultural use starting up again on this land. Therefore the ability of the site to ever achieve its inherent Subgrade 3a potential is very limited.
- 5.6 Core Strategy policy seeks to avoid areas of BMV agricultural land (although this policy carries reduced weight as it is not consistent with the NPPF). However, it is evident that it is not possible to avoid BMV land in meeting local development needs around Hurst and that, of the known ALC, the site between Lodge Road and Tape Lane represents the lowest quality land available.