

**Note on**  
**Agricultural Land**  
**From**  
*Greenbelt* (Rule 6 Party)  
**Presented by Paul King**  
**(Member and Advocate for Greenbelt)**



In the appeal: APP/B1930/W/24/3343986

Planning Application Reference: 22/0267

Land between caravan site and Watling Street,  
Park Street, St Albans, AL2 2PZ

### **Personal Profile**

I graduated from Liverpool University with an Honours degree in Engineering. I then spent 10 years in logistics and planning, running and designing transport systems and setting up distribution networks. After 10 years I moved into residential estate agency. I set up, and ran a sales and lettings company operating in the local area, which entailed undertaking every aspect of the business including sourcing land for development, interfacing with developers, but most of all ensuring that all clients received a professional service. I trained numerous staff to undertake their roles to a similar professional standard, including valuing properties and interfacing with clients and the public.

After 20 years I sold the business and became involved in addressing local issues relating to planning, specifically applications relating to Green Belt development. This included establishing the local campaign group *greenbelt* and forming a working relationship with other campaign groups around the district, to form the District Green Belt Alliance (DGBA) as well as interacting with local politicians, media outlets and of course supporters. I have been involved in this, on and off over the past 10 years, but have no professional qualification specific to planning issues.

I have lived in Park Street for 32 years, within 25m of the agricultural land in question.

The evidence which I have prepared and provide for this appeal reference APP/B1930/W/24/3343986 in this proof of evidence, is true and I confirm that the opinions expressed are my true personal opinions.

### **Agricultural Land**

1. This note addresses the effects of the proposal on this agricultural land, including the Best and Most versatile agricultural land.
2. The entire 4.3 hectares of application land has been successfully farmed for decades. Over the weekend when this note was written, the farmer harvested this year's crop of wheat, part of the natural, rural cycle that would be destroyed on this site should this development go ahead. Valuable crops including wheat and rape seed are grown on the proposed development site.
3. At a time when the UK is attempting to become more self-sufficient and one of the global leaders in wheat production – Ukraine – is currently under military attack, destroying this valuable wheat-growing agricultural land makes no sense.
4. The farmer of the proposed site also works the adjacent 18.4 hectare agricultural land, part of SA107, typically growing the same crop on both sites. He uses the same machinery on both pieces of land and treats them the same in terms of harvesting. He obviously benefits from the economies of scale when farming the combined area and it is unknown to what



extent his viability might be adversely affected, should he lose c20% of the land parcel. To what extent would the destruction of the proposed site provide a precedent to build on the neighbouring arable land, with a further loss of valuable wheat-growing capacity, perhaps because it becomes unviable?



*The potential development land in the foreground and the other land that the farmer works can be seen beyond. It is all treated as one agricultural land parcel by the farmer.*

5. In the Government's Open Consultation, "Proposed reforms to the National Planning Policy Framework and other changes to the planning system, updated" 2 August 2024, paragraph 21 (CD6.6), they state: "We have been clear that food security is important for our national security". They have removed a recently added footnote on this topic and go on to ask consultees: "Are there other ways in which we can ensure that development supports and does not compromise food production?"

6. The applicant commissioned a report from Ceres Rural to ascertain the Agricultural Land Classification (ALC) rating. Their conclusion was that part was graded at 3a and a larger portion graded at 3b, they therefore issued an overall grade of 3b, when taken as a whole. The difference between 3a and 3b, is that there are more stones in 3b graded land, however it makes no significant different to crop production and there has never been a shortage of farmers wishing to work the land.

7. More significantly for the applicant, is that grades 1, 2 and subgrade 3a are considered within the 'best and most versatile' (BMV) land category in the current planning system, so they can argue that the loss of this farmland would not be significant. This of course is not the case in real terms, given that the farmer has continually and successfully grown various grass crops on it over a very long time. In practical terms there is minimal difference between 3a and 3b (although a portion of the site is 3a anyway) merely that on 3b land, potato production can be more difficult due to slightly more stonier ground.