Bleadon Parish Council

Matter 17

DP53 Best and Most Versatile Land

Parish Clerk & RFO

Matter 17
Best and Most Versatile Land – DP53

Summary

Bleadon Parish Council (BPC) is of the following opinion:

- The Plan is not considered to be sound
- The Plan is not legally compliant in respect of DP53
- BPC is unsure as to whether North Somerset Council has complied with the duty to co-operate

BPC has previously raised concerns regarding the lack of focus upon the protection of land for food production. This is despite the fact that food security is one of the 13 national infrastructure sectors identified by the National Protective Security Authority. Whilst it is acknowledged that the LPA has undertaken further work in this respect, it is the view of BPC that the most up-to-date paper - Best and Most Versatile Agricultural Land Background paper (Update May 2026) – still does not provide sufficient protection of land for food production.

BPC's concerns are:

1. The policy fails to place sufficient emphasis upon the protection of land in the context of food production being identified as one of the 13 national infrastructure sectors.
2. BPC has significant concerns in relation to the predictive mapping split between Grade 3a and 3b land.
3. The wording in terms of development which might be permitted in relation to Grade 3 land is to open.
4. The policy fails to take into account the impact upon the rural economy from the loss of agricultural land.

Point 1 – National Infrastructure

The UK is already heavily reliant upon imported food in a number of respects. The loss of any further land currently used for food production will, therefore, only serve to exacerbate the current position. This position has been recognized by Government, with food production being identified as one of the 13 national infrastructure sectors.

Paragraph 188 (N1-1a) of the NPPF states that 'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework (65)'. Footnote 65 says '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'.

A Written Ministerial Statement (WMS) ‘Solar and protecting our Food Security and Best and Most Versatile (BMV) Land’3 was made in 2024. The statement made clear that food security is important to wider national security and so the UK should maintain the current level of food we produce domestically. It states that it is more important than ever that the best agricultural land is protected and our food production prioritised.

A National Policy Statement published in January 2024 makes clear that ‘applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of “Best and Most Versatile” agricultural land where possible. The Government in Powering Up Britain: Energy Security Plan clarified that while “solar and farming can be complementary” developers must also have “consideration for ongoing food production.”

Agricultural land is also vulnerable to development in relation to such aspects as renewable energy development. This vulnerability is likely to be compounded by pressures upon/incentives for landowners arising from aspects such as the Biodiversity Net Gain regulations.

Whilst the Local Plan proposals include reference to ‘where development for residential use is proposed both on allocated and unallocated sites layouts should, as part of an overall sustainable development, include proposals to preserve the better-quality land for gardens, allotments, community orchards or similar schemes which support local food production’ this seems to fail to recognize the scale of both the risk of land loss and the requirements of modern farming techniques.

The Parish Council is of the opinion that – in providing insufficient protection for agricultural land under DP53 – the Plan fails to meet national requirements and that there is a serious risk of agricultural land being lost to the extent that any requirements identified by the National Protective Security Agency will not be able to be met.

Point 2 – Predictive Mapping

DP 53 states the following in relation to Grade 3a land:

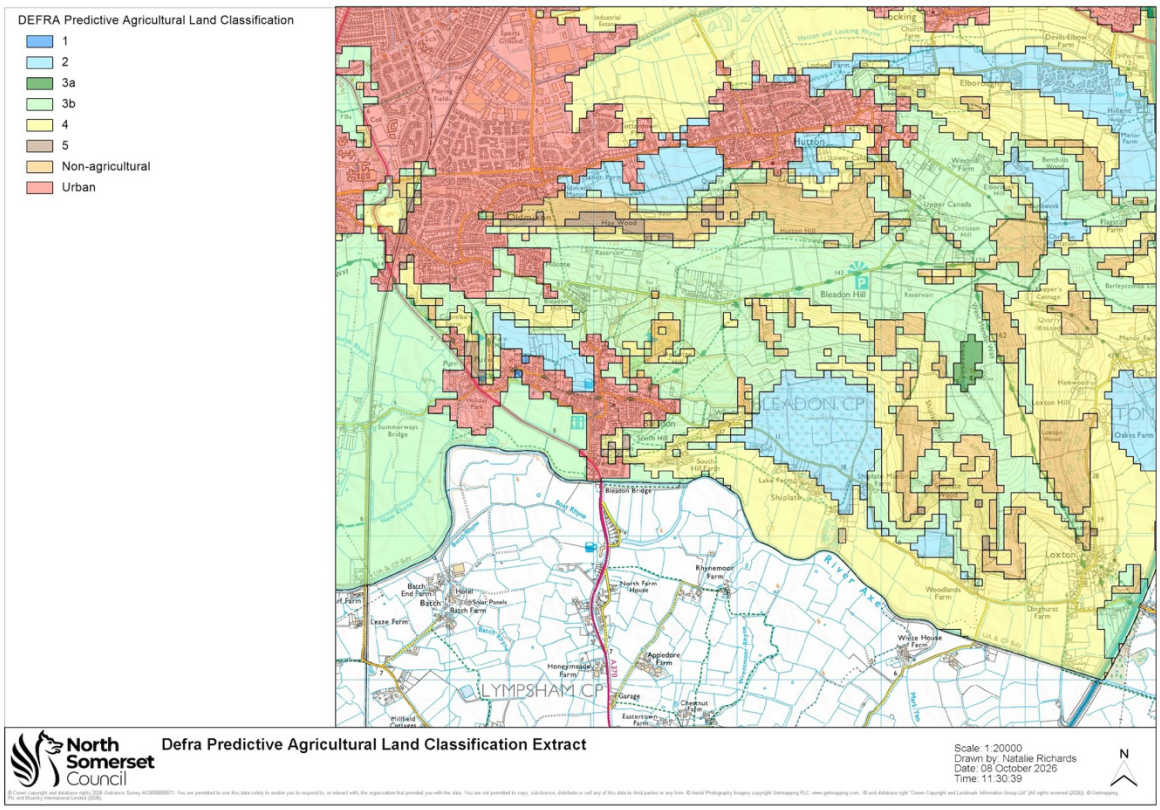
‘When assessing proposals for development on unallocated sites on agricultural land its agricultural land classification (ALC) will be taken into account. Where the land classification is uncertain or classified as grade 3 without further subdivision, a full survey will be required to establish its quality. The best and most versatile (BMV) land (grades 1, 2 and 3a) will be protected from significant, inappropriate and unsustainable proposals’.

The Best and Most Versatile Agricultural Land Background paper (Update May 2026) references the fact that in October 2025 DEFRA published a new strategic scale map called the Predictive Agriculture Land Classification Map. For the first time, this

dataset includes a comprehensive subdivision of Grade 3 land into Grades 3a and 3b.

The Agricultural Land Classification (ALC) system assesses land's inherent agricultural capability based on soil, climate, and site characteristics. Land is graded from Grade 1 (excellent) to Grade 5 (very poor). Grades 1, 2, and 3a are considered Best and Most Versatile (BMV). There is – in the opinion of BPC - a fundamental flaw with the DEFRA modelling which makes the need for a strengthened DP53 all the more relevant. It should also be noted that online mapping has been removed from the DEFRA website and whilst the raw data is still available, it is virtually impossible for small authorities (such as Bleadon Parish Council) without GIS mapping systems to visually relate the data accurately to geographical locations. LPA officers have, however, helpfully provided mapping data in relation to the Parish of Bleadon (below) which helps illustrate the Parish Council's concerns.

As can be seen on the plan below, there are large tracts of land which are identified as Grade 2 (light blue). Yet in most cases, land bordering the Grade 2 tracts is automatically identified as Grade 3b (light green) or Grade 4 (yellow). This would seem highly unlikely in practice and a more reasonable expectation would be that significant areas identified as Grade 3b (and possibly Grade 4) within the DEFRA modelling should be categorised as Grade 3a due to their proximity to Grade 2 land. It is possible that this issue might be addressed as part of refinement of the DEFRA modelling. However, this can in no way be guaranteed and DP53 should not rely upon the hope that this will be the case.



The potential problem with the DEFRA modelling also seems to be supported by the table referenced below, with only 1% of Grade 3a land lost compared to 26% of Grade 3b land. Logic dictates that there is a considerable under reporting of Grade 3a land within the DEFRA modelling. Local planning authorities are required to give consideration to the Best and Most Versatile agricultural land in plan preparation and in determining planning applications. Natural England suggests that local authorities ensure that sufficient detailed site-specific Agricultural Land Classification survey data is available to inform decision making. BPC recognises that the LPA has used the most up-to-date modelling available in the context of national guidance but is of the view that this modelling only re-enforces the need for DP53 to be strengthened.

	Previous ALC dataset		Updated provisional ALC dataset	
Classification/Description	Area (hectares)	Proportion of North Somerset	Area (hectares)	Proportion of North Somerset
Grade 1 - Excellent quality agricultural land	2,522	7%	1,405	4%
Grade 2 - Very good quality agricultural land	3,842	10%	2,949	8%
Grade 3a - Good to moderate quality agricultural land	22,469	60%	346	1%
Grade 3b - Good to moderate quality agricultural land			9,591	26%
Grade 4 - Poor quality agricultural land	4,060	11%	12,446	33%
Grade 5 - Very poor quality agricultural land	322	1%	339	1%
Non-agricultural - Land which is not in agricultural use, but could be returned to it in future	1,529	4%	3,396	9%
Urban - Areas within an urban area with very little potential to return to agricultural land	2,451	7%	7,003	18%

The supporting paper produced by the LPA makes clear that the Predictive ALC Map is not intended to replace the need for Agricultural Land Classification site survey work. However, this fails to recognise the reality of resource limitations within the LPA and the limited time available to officers to adequately assess land classifications in the context of development proposals. The reality is that the ‘prize’ of assessing land as falling within Grade 3b as compared to Grade 3a is such that developers will devote considerable time and resource in mounting arguments which the LPA and local communities will struggle to find the capacity to match.

Point 3 – Criteria in Relation to Grade 3 Land

The definition of permitted development as currently worded is where development is proposed on
sites of one hectare or greater on Grade 3a BMV agricultural land, development will only be permitted if:

- It is one of the exceptions listed under Grades 1 and 2; or
- It is to be used for renewable energy production where the land could be returned to agriculture without a loss of quality; or
- Is for affordable housing; or

- The sustainability benefits of the proposal clearly outweigh the long-term loss of the best and most versatile agricultural land.

As a consequence, the protection afforded to Grade 3a land is limited and no protection is offered to Grade 3b land. Conversely, DP52 (Protection of open space and recreation) – which is not land forming part of a national infrastructure sector - establishes a far higher standard of protection in that a condition of development is (amongst other aspects) a requirement for any land to be used for development purposes to be replaced 'by at least equivalent or better'.

In order to make the Plan legally compliant and sound in respect of DP53, the Parish Council would wish to see more explicit protection of Grade 3 (and above) land currently used to support food production. If North Somerset Council proposes that such protection/clarification might come by way of the preparation of a Supplementary Guidance then the Parish Council would urge early completion of such a document.

BPC would also suggest that there is an opportunity for the wording under DP8 (Efficient Use of Land) to be strengthened. At the moment, the wording of DP8 is heavily influenced by the NPPF in terms of housing targets. Whilst this is understandable, DP8 could be strengthened to clarify expectations around use of land to limit impacts elsewhere. A prime example of an approach which would potentially limit the impact upon agricultural land would be for DP8 to be clear on the need for solar panels on roofs rather than on agricultural land – with a corresponding cross reference to DP7 (Large scale renewable and low carbon renewable energy).

Point 4 – Rural Economy

Whilst it is recognized that proposed wording includes reference to permission being granted only if land could be returned to agriculture without loss of quality, the wording fails to recognize the practical implications of any change of use upon existing communities. By way of an example, agreements in relation to the placing of solar panels will likely be for a number of decades and once such land is lost, the farming communities (and knowledge and skills base) will also be lost. A significant proportion of North Somerset is rural yet the rural economy is not adequately protected – let alone promoted – by the policies within the Local Plan.