

Date: 14 March 2013
Our ref: 78320
Your ref: 100966



Edward Thomas
Herefordshire Council

BY EMAIL ONLY

Customer Services
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T 0300 060 3900

Dear Mr Thomas,

Description: Application (part retrospective) to erect, take down and re-erect polytunnels, rotated around fields as required by the crops under cultivation (soft fruit)

Location: Pennoxstone Court Farm, Kings Cagle, Herefordshire, HR1 4TX

Thank you for your consultation on the above planning application, dated 12 February and received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England **objects** to the proposed development due to the landscape and visual impacts on this part of the Wye Valley Area of Outstanding Natural Beauty. Our objection relates specifically to the inclusion of Garden Field within the application. We also offer our advice with regard to the scale of the application and strongly advise you to give great weight to the views of the Wye Valley AONB Unit in order to reach a fully informed determination of the application as a whole.

The Landscape and Visual Impact Assessment chapter of the Environmental Statement concludes that the polytunnels in Garden Field would produce a 'significant' negative impact on the character of the AONB, which would only reduced to 'low' after 10 years when screening planting had matured. In addition, Garden Field is on the Wye Valley slopes; an area deemed unsuitable for polytunnels by the Inspector's decision on this site in 2006 (APP/W1850/C/07/2041603). We therefore **object** to this proposal on these grounds.

With regard to the landscape and visual impacts arising from the wider site, we advise the Local Planning Authority to take account of the advice provided by the Wye Valley AONB unit. The AONB staff can provide an assessment based on a detailed knowledge of this location and on how the development relates to policies and priorities for the AONB set out in its management plan. The LPA is also advised to consider the proposal's fit with Unitary Development Plan Policy LA1: Areas of Outstanding Natural Beauty.

This application includes an Amended LVIA. We are disappointed to note that our recommended additions to the LVIA (first made in 2009) have not been acted upon. Specifically, potential views from footpaths in the Harewood to Hentland area do not appear to have been considered and close-distance views from the Herefordshire Trail have not been thoroughly evaluated.

The Amended LVIA contends that the site and the area of polytunnel coverage is 'small scale' and that therefore the proposal complies with Policy LA1. Defining scale will always be relative.

It is Natural England's opinion that because policy LA1 is a landscape policy, the magnitude of the impacts on the landscape's character and quality should determine whether or not an application is small scale. In this case, the LVIA identifies significant impacts on the landscape character and significant visual impacts. Although screening planting is proposed to reduce these impacts, this will take a number of years to mature.

Natural England does not consider 25ha of polytunnels with significant landscape and visual impacts to be 'small scale'. We hope that this view is helpful but of course it is up the Local Planning Authority to interpret and apply its own policies.

National policy must also be applied to development decisions affecting protected landscapes. The National Planning Policy Framework states that *"Great weight should be given to conserving landscape and scenic beauty in ... Areas of Outstanding Natural Beauty"* and *"Planning permission should be refused for major developments in these designated areas, except in exceptional circumstances and where it can be demonstrated that they are in the public interest"* (paragraphs 115 and 116). It is also clear that the presumption in favour of sustainable development does not automatically apply within AONB's (paragraph 14, footnote 9).

For any queries relating to the specific advice in this letter only please contact Hayley Pankhurst on 0300 060 1594 or by email hayley.pankhurst@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely,

Hayley Pankhurst

Lead Adviser
Land Use Operations

Land Use Planning Consultations



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Improving the overall quality of our service

The overall quality of our service throughout your consultation process:

- 2) *In relation to your particular consultation, do you have any suggestions, ideas or feedback on how we can improve our service to you? If you have responded 'dissatisfied' or 'very dissatisfied' for question 1, please provide further information on why this is the case.*

If you would like to be contacted about this consultation please tick this box ☐ and add your direct e-mail address here:

Thank you for taking the time to let us have your views.

Rob Cooke, Director for Land Use.

Using and sharing your information

The data controller is Natural England, Foundry House, 3 Millsands, Riverside Exchange, Sheffield S3 8NH

Your information will be stored and processed in accordance with the Data Protection Act 1998. This Act gives you, as an individual, the right to know what data we hold on you, how we use it, with whom we share it and for it to be accurate.

Any information you provide will only be used by Natural England for the purposes of service standard monitoring.

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