

MEMORANDUM

To : **MR E THOMAS, SOUTHERN PLANNING SERVICES**

From : **MS J. WHEATLEY, TEAM LEADER, CONSERVATION**

Tel : **01432 260157** My Ref :

Date : **8th April 2013** Your Ref : **SE/100966/F**

SITE: **Pennoxstone Court Farm, Kings Caple, Herefordshire, HR1 4TX**

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

Planning application SE/100966/F has been remitted to Herefordshire Council for redetermination. The landscape consultation response to this application, dated 8th September 2010 should be read in conjunction with this report. It is included as an appendix.

A Supplementary Landscape and Visual Report (January 2013) has been submitted to support this application. This consultation response takes into account the following items for which fresh information/analysis has been provided in this report:

- Zone of Visual Influence (ZVI);
- Landscape mitigation measures which have been undertaken to date;
- The degree of compliance of this development with the Herefordshire Unitary Development Plan (UDP) policy LA1: Areas of Outstanding Natural Beauty.

Zone of Visual Influence

The Supplementary Landscape and Visual Report includes the calculation of the theoretical ZVI through the use of a modelling process. The ZVI illustrates the extent to which the polytunnel sites are potentially visible from the surrounding area. The provision of this more detailed information is welcomed.

The ZVI images (figures 6 to 10) are useful in demonstrating the potential visibility of the polytunnels based on the underlying landform of the area. The maps do provide clarity that the key viewpoints selected for the visual analysis are within the extent of the ZVI and that no additional viewpoints are required. The methodology process presented is suitable and the output is deemed accurate. It is acknowledged that the actual visual extent is less than that shown in figures 6 to 10 as these images do not take account of buildings, hedges and tree cover. The figures do demonstrate that rotating the polytunnels does provide *subtle* variations in the ZVI.

Figures 6 to 10 illustrate, as expected, the relationship between the topography of the Wye valley in this location and the visibility of the polytunnel sites: the area of high potential visibility is the western side of the river valley; the arc of rising ground from Altbough, to the north, Redrail, to the west and Caradoc Hill and Sellack to the south.

As stated previously, the elevated nature of a significant number of public vantage points on this elevated ground means that no amount of mitigation could screen polytunnel development effectively when viewed from these vantage points.

It is argued in the document that both the actual ZVI and the polytunnel development are small in scale in the context of the AONB; it is stated that the actual ZVI affects less than 5 sq km of the AONB. The AONB designation does cover a large area; however, it is specifically the river valley, with its particular scenic qualities, which is at the heart of the AONB; it is the 'Wye Valley AONB'. This polytunnel development site, being situated in the river valley, is therefore in the part of the landscape with the highest value and highest sensitivity, in the context of the whole AONB. The dominance of the coverage across this spur of land is very large scale in relation to the setting.

Furthermore, the fact that there are two river crossings available to pedestrians, in this part of the river valley - the road bridge at Hoarwithy and the pedestrian bridge 3.5km downstream at Sellack Boat, makes this area particularly attractive to walkers because it is possible to access footpaths on both sides of the river and to do circular walks. The only other bridges across the River Wye between Hereford and Ross-on-Wye are the Holme Lacy road bridge, 10km upstream and the pedestrian bridge at Foy, 8km downstream. This particular part of the Wye Valley AONB is therefore, more intensively used for walking than other parts of the river valley where there are no bridges; viewpoints from public footpaths are of particular significance.

The scale of the ZVI and the fact there is no viewpoint from which all of the covered tunnels would be visible together is of little relevance to the way in which people experience the landscape. People living and working in and visiting the Wye Valley do not experience the landscape in plan form, they experience it by travelling through it, gaining a succession of views which will include some or all of the polytunnel sites, depending on their route.

Landscape mitigation

The proposals are shown on the 'Landscape Strategy' plan (January 2013) and comprise new copse planting, tree screening belts, enhancement of existing hedgerows, new hedgerow planting and the planting of groups of Willow and Alder.

The 'Landscape Strategy' plan should be read in conjunction with the 'Summary Planting Plan, revision F' (March 2010), within the Ecological and Landscape Management Plans (August 2011) which was submitted for the discharge of conditions. A further letter and plan has been received from the applicant identifying the planting that has been carried out (dated 10/04/2013). It is agreed that the planting detailed in this record has been undertaken; this was verified in a site visit undertaken in April 2013. The new planting comprises:

- New boundary hedgerow planting to west and north of Old Sward.
- Two new cross field hedgerows at Garden Field.
- Hedgerow planting adjacent to the Church.
- Additional planting not forming part of the mitigation scheme has also been carried out close to Pennoxstone Court and on the eastern boundary of Wetlands and Front Meadow.
- Three new cross field hedgerows have been planted at Windmill Field, however they are along the leg rows of polytunnel frames, with the southern two under the covers. Due to the constraints of the frames, covers and limited space these will not establish suitably to fulfil the function intended by the mitigation – to visually break up the expanse of coverage and to

create new wildlife corridors. The northern section is not under cover, but is interrupted by metal framework.

No copse planting has been undertaken to the east boundary of Windmill Field, adjacent to the residential dwelling. No gapping up has been undertaken to the southern boundary of Old Sward. No gapping up has been undertaken at Ellen Field or Top Ruxton. It is accepted that no planting has been undertaken on Forty Acre and George Harris, where there is currently no polytunnel coverage. Existing hedgerows have generally all grown up to at least 3m high. The hedgerow verges vary in width.

The photographs in the current LVIA are welcome, however it is not accepted that these clearly identify any noticeable change to the original LVIA photographs, taken October 2009. The planting which has been undertaken has not matured sufficiently to contribute as a screen or filter, it would take a minimum of five years for the planting to mature sufficiently to contribute to screening. Therefore the assessment of landscape and visual impacts contained in the previous landscape consultation response (8th September 2010) still stands – adverse impacts identified then remain the same.

Policy LA1: Areas of Outstanding Natural Beauty

It is asserted in the submitted 2013 LVIA that the polytunnel development is 'small scale' development; for the following reasons:

1. The scale of the polytunnel structures themselves. It is asserted that polytunnels are relatively low structures; that the majority of existing agricultural, residential and other buildings have a ridge height usually in excess of double that of polytunnels. It is acknowledged that the polytunnels on the site, the majority of which are Spanish tunnels, with a ridge height of 3 – 3.7m, are relatively low structures.
2. The scale of the area of covered polytunnels, (25 hectares) is small in relation to the scale of the whole of the Wye Valley AONB; the area of covered tunnels represents only 0.076% of the AONB.
3. The theoretical ZVI of approximately 5 square kilometres is small scale in the context of the whole of the Wye Valley AONB.

These arguments are not accepted. It is argued in response that the proposed development cannot be considered to be small scale because:

1. It is the horizontal spread of polytunnels which causes the majority of the adverse visual impacts. Contiguous tunnels in a field(s) have a much greater plan area than the built structures referred to and when viewed from elevated vantage points, it is the plan area of structures which is more relevant than their vertical height.
2. The polytunnels are not viewed in the context of the whole of the Wye Valley AONB, as demonstrated by the ZVI, they are viewed in the context of a ZVI of approximately 5 square kilometres. The scale of the proposed development is large in relation to the sensitive landscape of the Kings Cable spur of land. Therefore the perceived intensity of polytunnel development is greater than is suggested.
3. As stated previously, people do not experience the landscape in plan form, as they move through the landscape in the vicinity of the development site they gain successive views of the polytunnels.

It is considered that the polytunnel development does adversely affect the intrinsic natural beauty of the landscape. It is asserted that the use of polytunnels is part of the evolving agricultural landscape. However, this cannot be squared with the fundamental test of Policy LA1: *'priority will be given to the protection and enhancement of the natural beauty and amenity of the area in the national interest in accordance with the relevant management plans'*.

The polytunnel development does not meet the test of '*enhancing the quality of the landscape*'. Firstly, in relation to baseline landscape resources, the baseline condition, particularly in relation to Windmill field, Ellen field, 40 Acre, Old Sward and George Harris, is a degraded landscape due to the loss of hedgerows and increase in size of the fields. Whilst it is acknowledged that the proposed planting scheme will restore some of the characteristic landscape features, this will only partially restore what has been lost. .

The mitigation measures proposed will reduce the adverse impact to some degree but will not adequately mitigate the detrimental effect upon the landscape – this is another test in Policy LA1. In assessing the proposed mitigation, all of the mitigation measures proposed: moving tunnels away from the valley sides, dispersal of polytunnels over a greater number of sites, rotation, the enhancement of existing planting and proposed new planting have been considered.

The conclusion remains the same. The removal of the majority of polytunnels from the prominent south-west facing slopes below Pennoxstone Court is beneficial and has reduced adverse visual impacts on views from the east.

However, the switch from sites on the south-west facing slopes below Pennoxstone Court to sites to the north and east of King's Caple (Forty Acre Field, Old Sward and Ellen Field) and the dispersal of tunnels over six areas has some negative aspects. Ellen Field, 40 Acres and Old Sward are in prominent, quite elevated locations and are visible from various elevated viewpoints on the western side of the River Wye. The topography of the area, the location of the six sites on a convex spur of land, overlooked by rising ground on the western site of the Wye valley, mean that from certain viewpoints, a number of the polytunnel sites are viewed in combination, increasing the degree of adverse impact on the Wye Valley Area of Outstanding Natural Beauty.

The efficacy of rotation, as a mitigation tool, is limited by the relatively compact nature of the landholding – all of the tunnelled fields are on the same spur of land, not dispersed over a wide area. .

Given the negative landscape impacts which have been identified, the ten year permission requested is considered to be long term, not transient.

It is concluded that no valid arguments have been put forward to support the assertion that the polytunnel development is in accordance with Policy LA1. It is maintained that the development conflicts with Policy LA1.

Other policy considerations

The proposal will adversely affect the overall character of the landscape, as defined by the Landscape Character Assessment. The proposed polytunnels represent inappropriate development that cause unacceptable adverse change to the landscape of Kings Caple and is therefore contrary to UDP Policy LA2.

The National Planning Policy Framework para. 115 states that great weight should be given to conserving landscape and scenic beauty in AONB, which have the highest status of protection in relation to landscape and scenic beauty. The polytunnels do introduce an artificial feature into the AONB and the scale in relation to the Kings Caple area is considered to be a major development. The detrimental landscape character and visual effects can only be moderated to a minimal extent, as described above.

Policy LD1 of the emerging Core Strategy, on local distinctiveness, states that the Wye Valley AONB is an exemplar of local distinctiveness and the adopted management plans will be material to future development proposals. The development would have a negative impact on the Landscape Management Zone Kings Caple Lowlands (LMZ 5) as identified in the AONB Management Plan. As stated by the AONB officer (12 March 2013), the primary purpose of the AONB to conserve and enhance natural beauty should take precedence where there is a conflict with other Management Plan policies.

APPENDIX

MEMORANDUM

To : **MR E THOMAS, SOUTHERN PLANNING SERVICES**

From : **MS J WHEATLEY, TEAM LEADER, LANDSCAPE & BIODIVERSITY**

Tel : **01432 260157** My Ref :

Date : **8th September, 2010** Your Ref : **SE/100966/F**

SITE: **Pennoxstone Court Farm, Kings Cagle, Herefordshire, HR1 4TX**

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

This memo should be substituted for my previous memo dated 5th July 2010. This revised memo takes into account the findings of a further site visit to the Kings Cagle area, on 17th August 2010, undertaken with Mr Thomas and Mr Withers of Planning Services and also revised landscape details submitted on 27th August 2010.

The village of King's Cagle, with Pennoxstone Court Farm lying on the eastern fringe of the village, is situated on a spur of land on the eastern side of the Wye Valley, overlooked by rising ground on the western side of the Wye Valley. The six areas which comprise the application site are dispersed around the King's Cagle spur of land. With regard to landscape character, the Lower Wye Valley is characterised by mixed agricultural use. The King's Cagle spur of land falls within the landscape type Principal Settled Farmlands, as defined in Herefordshire Council's Landscape Character Assessment 2004 (updated 2009). The lower ground - the River Wye floodplain, is described as Riverside Meadows.

This part of the Lower Wye Valley is highly sensitive from landscape, historic building, archaeological and ecological perspectives. The King's Cagle spur of land, including the application site, falls within the Wye Valley Area of Outstanding Natural Beauty. This part of the Wye Valley is particularly rich in terms of historic parks and gardens. Pennoxstone Court, Poulstone Court and Aramstone, which are all located on the King's Cagle spur of land, and Caradoc Court, which is located on a high ridge on the southern side of the River Wye, are historic parks of local interest – they have the status of Unregistered Parks and Gardens. St. John the Baptist's church, in King's Cagle, which is a Grade 1 listed building and Cagle Tump Motte, a Scheduled Ancient Monument, are located on the highest point of the King's Cagle spur of land. The River Wye is classified as a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC).

The proposal, as it was in the previous application, (DCSE2008/3036/F) is to restrict the area of polytunnels on the south-western facing slopes below Pennoxstone Court to Garden Field only (the existing lawful tunnelled area, to the north-west of Garden Field is to be relocated into Garden Field with the area vacated being thereafter excluded from polytunnel use), to maintain the use of Packhouse and Plum Field, Windmill Field/Top Ruxton and part of the George Harris field for polytunnels and to bring three new fields into use for polytunnels: Ellen Field, which lies to the north of King's Cagle, 40 Acre Field, which lies to the north-east of the village and Old Sward, which lies on the eastern fringe of the village.

Environmental Statement: Landscape and Visual impact Assessment

Baseline Landscape and Visual Resources

It is important that the baseline landscape information is comprehensive and accurate because it is on this information that the analysis of the capacity of this particular landscape to assimilate polytunnel development is based.

I consider that the baseline landscape information is comprehensive and accurate, with the exception of the description and analysis of some of the historic landscape issues. This section doesn't fully describe the distinctive historic landscape character of the King's Caple spur of land on which the application site is situated which is created by the full range of historic assets: historic pattern of hedgerows, parklands, listed buildings and the Scheduled Ancient Monument, acting in combination.

The description of historic assets in the vicinity of the application site is very partial: only Caple tump, a Scheduled Ancient Monument is mentioned. There is no reference to the four parklands of local importance: Pennoxstone Court, Poulstone Court, Aramstone and Caradoc Court within the visual envelope of the application site. These parklands have the status of 'Unregistered Parks and Gardens' and are afforded similar policy protection to Registered Parks and Gardens in the Herefordshire Unitary Development Plan. Likewise, there is no reference to the presence of the Church of St. John the Baptist, which a Grade 1 Listed Building, which is also within the visual envelope of the application site.

I acknowledge that some information about historic assets is included in the appendices – Appendix 9: Archaeology and Cultural Heritage contains maps showing the Unregistered Parks and Gardens and the historic pattern of hedgerows (Tithe Map for King's Caple - 1839) and Appendix 10: Landscape and Visual Impact Assessment contains a map of Statutory Designations, including listed buildings. However, explicit reference should have been made to these assets, the interrelationships between them and their cultural value, in the baseline landscape description.

In addition, I note that whilst listed properties and Scheduled Ancient Monuments have been identified as key landscape receptors to be considered, (paragraph 10.104) Unregistered Parklands are not identified as key receptors. This appears anomalous, given that they are an integral part of the historic landscape.

In relation to the historic pattern of hedgerows, there is a general reference to the loss and decline of field boundary hedgerows during the twentieth century and the increasing openness of the landscape (paragraph 10.88). However, there is no detailed analysis of the loss of hedgerows, over time, from the six areas which comprise the application site. A comparison of the Tithe Map of King's Caple (1839) with current aerial photographs shows that 7 internal hedgerows have been lost from Windmill field, 1 from Ellen field, 3 from 40 Acre, 11 from Old Sward and 3 from George Harris. However, it is stated in the baseline landscape assessment (paragraph 10.55) that the polytunnels are set '*within a framework of small/medium square fields*'. This generalised description is not applicable to the fields identified above, which have increased in scale considerably, due to the loss of hedgerows. In these areas, the baseline condition is a degraded landscape through agricultural intensification. This is a significant point because the loss of the framework of hedgerow in these areas makes it more difficult for polytunnel development to be assimilated into the landscape.

Visual Appraisal

I consider that the viewpoints selected for assessment are representative of the views of the application site which are available from public places and the nearest residential properties.

Landscape and visual impact issues

My analysis is based on site visits to the application site and the surrounding area undertaken in 2008, 2009 and 2010, in order to assess the current proposals, as they evolved. I also refer to the Landscape and Visual Impact Assessment (LVIA) contained in the Environmental Statement.

The plans showing the typical polytunnel coverage on rotation for the spring and autumn seasons for selected years (2012, 2017, 2020) are very helpful in terms of describing the complex rotation of polytunnels across the six areas included in the application site. These plans indicate that Garden field, Packhouse, Plum and Windmill field will be used most intensively for polytunnels, with the use of the fields Top Ruxton, Ellen, 40 Acre, Old Sward and George Harris being more intermittent.

Evaluating the visual impact of polytunnels involves assessing a number of inter-related issues: the visibility of the polytunnel sites, the cumulative impact of the polytunnels, with reference to the timing and duration of polytunnels on particular sites and the appropriateness and efficacy of the proposed mitigation measures. These issues are addressed in turn.

Views into the sites from the wider landscape

The topographical position and dispersal of the polytunnel sites around the King's Caple ridge of land mean that different sites, or combinations of sites, come into view when travelling around the land on the western side of the River Wye. Below is a description of the visibility of the sites and the impact, in particular, the cumulative impacts, of the polytunnels, from representative viewpoints.

Views from the north

Albough

From the minor road through Albough, in the vicinity of Albough Farm, there are glimpsed views of part of Packhouse, Windmill Field/Top Ruxton, and Ellen Field (LVIA viewpoint 15). There would be cumulative private views of these sites from the upper, south-east facing windows of houses at Albough. Adding Ellen Field to the range of fields used for polytunnels has increased the cumulative adverse impact of polytunnels on views from Albough.

The LVIA assesses the cumulative impact as '*moderate*', which is a fair assessment, in relation to public vantage points on the road, but I consider that there would be a substantial adverse impact on the private views from the upper windows of houses, as identified above, which would afford more expansive views of the polytunnel sites.

With reference to the indicative rotation plans, it is acknowledged that this cumulative adverse impact will be reduced by the relatively low use of Top Ruxton for polytunnels (it is indicated that this field will be used for one year out of every three, for part of a growing season), the intermittent nature of the polytunnel use of Ellen Field and the fact that only half of this field would be covered in polytunnels over the course of a growing season.

In terms of planting, one of the key mitigation tools, as identified in the LVIA, is the introduction of strategic hedges within the polytunnel sites, to break up the mass of polytunnels. However, the proposals for new internal hedgerows/tree belts are very limited - no new internal planting is proposed for Ellen Field (despite the fact that an internal hedgerow was lost from this site in the past) and the proposed cross-field hedgerow planting in Windmill Field is limited and discontinuous.

Views from the east

No long distance views are possible from the east.

Views from the south

Sellack

From the minor road to Sellack, adjacent to Sellack cemetery, which is in an elevated position on the slope below The Old School, polytunnels on the George Harris field are prominent (LVIA viewpoint 19). Parts of Old Sward and Forty-Acre Fields are also visible from this viewpoint. The boundary hedges of Ellen Field and Garden Field are visible but not polytunnels on these sites.

The proposed rotation schedule would reduce the cumulative impact to some degree. The indicative rotation plans show that polytunnel use of George Harris would be relatively infrequent - one year out of every three, for part of a growing season. It is indicated that there would not be concurrent use of Forty-Acre field and Old Sward for polytunnels and that only part of these fields would be used in a growing season.

The proposed tree/hedgerow planting on the boundaries of these sites will provide some screening, however, the topography of the Wye valley will limit the efficacy of any type of screening because the viewpoint adjacent to Sellack cemetery is elevated in relation to George Harris, Old Sward and Forty Acre. From this viewpoint the proposed cross-field hedgerow in Forty-Acre Field will only make a very limited contribution to screening because of its orientation (northwest – southeast).

Caradoc Hill

It was noted on site visit that from elevated viewpoints on Caradoc Hill, (LVIA viewpoint 27) polytunnels in Garden Field are more prominent than the adjacent lawful tunnelled area, because of the angle of vision. From this viewpoint, polytunnels in Garden Field are seen in combination with polytunnels in the Pack House and Plum fields.

The indicative rotation plans show that Garden Field will be under intensive polytunnel use with polytunnels occupying the whole site for 5 out of the 6 seasons described and half of the site for the remaining planting season. This means that it is planting, not rotation, which is relied on as the mitigation tool. The proposed screening belts to the south-east of Garden Field will, as they mature, partially screen the polytunnels when viewed from Caradoc Hill, but could not fully screen the site, because of the elevation of the viewpoint.

Views from the west

Redrail, footpath HN9

The most significant cumulative impact of the polytunnels is experienced walking along this footpath, which traverses the east-facing, open slopes above the minor road between Hoarwithy and Poolmill. There are open, elevated views of Garden Field and filtered views of Plum and Packhouse, Ellen Field, Forty-Acre Field, Windmill Field/Top Ruxton in combination, from a 300 metre (approximately) section of footpath HN9. Moving southwards along this section, Forty-Acre Field becomes more prominent. From the southern end of the footpath, where it crosses the top edge of the field above Redrail Farm, Ellen field and Forty-Acre Field remain prominent, being almost on the skyline.

From vantage points along footpath HN9, polytunnels on Plum and Packhouse fields are relatively well-screened, so the proposed continuous use of these fields for polytunnels which is indicated will only have a slight adverse visual impact.

The proposed rotation schedule would reduce the cumulative impact in relation to Ellen field, 40-Acre and Top Ruxton, because polytunnel use on these fields would be intermittent. In relation to Garden Field, this site is in a very sensitive, visually prominent position on the south-west facing slope below Pennoxstone Court. The proposal to relocate the adjacent area of lawful polytunnels into Garden field would reduce the adverse impact slightly for two reasons – the polytunnels would occupy a slightly smaller area and visually they would be partially contained by the belt of mature trees along the south-western edge of Garden Field.

In relation to mitigation planting, the topography of the Wye valley will limit the efficacy of the proposed planting because of the elevation of the middle section of HN9 – the views are down onto the site.

Views of the sites from the King's Caple spur of land

I concur with the general findings of the LVIA with regard to medium distance and close views of the site from the King's Caple spur of land. The key views are summarised below. I have also identified the key visual impact issues that relate to each site.

Garden Field

There are no views of this site from the King's Caple spur of land, due to the absence of public rights of way crossing the south-west facing slopes below Pennoxstone Court, where Garden Field is situated. No adverse effects are predicted.

Packhouse & Plum Fields

Views into these fields are restricted by landform and the boundary hedgerows and trees.

Windmill Field & Top Ruxton

Close views are available from the public footpath (KC13), which descends from St. John the Baptist Church and along the eastern boundary of Windmill Field and there are glimpsed views from gateways and occasional gaps in the hedgerows along the lanes to the north and south of the site.

I maintain my view that the polytunnels on Windmill Field have a substantial adverse impact on close views to and from the church and those available from the lanes abutting the site. This impact will be significant, because the indicative rotation schedule shows that a substantial area of Windmill Field will be used continuously for polytunnels.

The native tree belt proposed along the eastern site boundary will help to screen views from properties. Whilst the proposed new hedgerows within Windmill Field are welcomed the efficacy of this mitigation, in relation to views in from public footpath KC13 will be limited, because these views are down onto the site

Ellen Field

This is largely screened by the field boundary hedgerow but there are views into the site through field gateways. There are potential views from properties close to the northern boundary of this site, such as Armastone cottages and Green Barn.

Forty Acre Field

This is largely screened by field boundary hedgerows but there are views into the site through field gateways. There are potential views from properties on the north and eastern perimeters of King's Caple but the proposed enhancement of the hedgerow to the west of this field will help to screen these views.

Old Sward

Views into the site from the lane which abuts the site to the east are screened by the dense roadside hedgerow. Polytunnels would be visible from footpath KC8, which runs between King's Caple and Pen-alt. This footpath passes through the north-western corner of the field called Old Sward. The area in Old Sward which is to be utilised for polytunnels is set back from the footpath. There is no existing hedgerow along part of the north-western field boundary of Old Sward or along its western boundary. As noted previously, the historic pattern of hedgerows at Old Sward, as shown on the Tithe Map for Kings Caple (1839) has been severely degraded over time. The site called Old Sward formerly comprised five field compartments. The amalgamation of these fields has resulted in the loss of eleven hedgerows. The absence of hedgerow along the western and part of the north-western boundaries of Old Sward means there would be open views of polytunnels from the section of footpath KC8, where it passes through the north-western corner of Old Sward. It is proposed to plant new native species hedgerows to replace these two missing hedgerows. However, it would take a

minimum of five years for these hedgerows to mature sufficiently to contribute to screening. It should also be noted that the new hedgerow along the north-western site boundary would not be planted on the line of the historic hedgerow – it would be further into the field in order to separate the footpath from the polytunnel area. The restoration of the historic landscape character of the area would therefore be compromised somewhat by the need to screen views of the polytunnel development from the footpath.

There are also views into Old Sward from the section of the minor road on the southern boundary of Old Sward, between Poulstone Farm and the Poulstone Court frontage, due to the lack of a field boundary hedgerow along the northern side of this section of road. The proposed replacement section of hedgerow planting would screen this view.

George Harris Field

There are close views into this field from adjoining properties on the northern and western boundaries and from an access gate on the northern boundary. Maintaining a 30 metre standoff to property boundaries, as indicated, will help to reduce adverse visual impact.

Impacts on landscape character

Rural landscape character

All of the proposed polytunnel sites fall within the landscape type Principal Settled Farmlands as defined in the Landscape Character Assessment. Key characteristics of this landscape type are field boundary hedgerows and mixed farming land use. As described previously, the landscape character of Windmill Field/Top Ruxton, Ellen Field, Forty Acre, Old Sward and the George Harris field has been degraded by agricultural intensification over a long period of time which has resulted in the loss of field boundary hedgerows, the amalgamation of fields and subsequent increase in the scale of field compartments. This more open landscape exacerbates the adverse impact of polytunnels, because of the effect of visual coalescence.

The proposed planting strategy includes the following elements: new copse planting, tree screening belts, enhancement of existing hedgerows, new hedgerow planting and the planting of groups of Willow and Alder. This is appropriate in the main and will help to reinforce the character of Principal Settled Farmlands but I have concerns about certain elements.

It is disappointing that no new cross field hedgerows are proposed for Ellen Field, Old Sward and the George Harris field. It is acknowledged that in respect of the rented fields, it may be difficult to employ this form of mitigation, because of the need to gain consent for new cross field hedgerow planting from the landowners of these fields. However, given that the application site is within the Wye Valley Area of Outstanding Natural Beauty, the need to provide adequate mitigation is paramount.

It is acknowledged that some new cross-field hedgerow planting is proposed for Windmill Field, and Forty Acre Field. However, this only partially addresses the degradation of landscape character that has occurred through the loss of hedgerows and increase in the scale of the field pattern.

Historic landscape character

As stated previously, I consider that the polytunnels on Windmill Field have a substantial adverse impact on close views to and from the church. The proposed tree belt and hedgerow planting within Windmill Field and the tree belt along the eastern boundary will partially mitigate the adverse impact, in respect of views towards the church. However, this planting will have less effect in respect of views from the church, because the church is in an elevated position, with views down onto Windmill Field.

In addition, the parklands of local importance – Pennoxstone and Poulstone Court, are affected by polytunnels in Garden Field and George Harris, respectively. In relation to Pennoxstone, the proposed mitigation planting adjacent to and in the vicinity of Garden Field, will only have limited efficacy, because of the elevated nature of the viewpoints that overlook this part of the application site.

In relation to Poulstone Court, I could not advocate locating polytunnels adjacent to the area of parkland, because they degrade its setting. However, I acknowledge that the reduction in the area of polytunnels in this field and pulling them away from Poulstone Court has reduced the level of adverse impact on the historic parkland.

Conclusion

The removal of the majority of polytunnels from the prominent south-west facing slopes below Pennoxstone Court is beneficial and has reduced adverse visual impacts on views from the east.

However, the switch from sites on the south-west facing slopes below Pennoxstone Court to sites to the north and east of King's Caple (Forty Acre Field, Old Sward and Ellen Field) and the dispersal of tunnels over six areas has some negative aspects. Ellen Field, 40 Acres and Old Sward are in prominent, quite elevated locations and are visible from various elevated viewpoints on the western side of the River Wye, as detailed in this memo. The topography of the area, the location of the six sites on a convex spur of land, overlooked by rising ground on the western site of the Wye valley, mean that from certain viewpoints, a number of the polytunnel sites are viewed in combination, resulting in a cumulative adverse impact on the Wye Valley Area of Outstanding Natural Beauty.

The mitigation measures proposed: new planting, rotation and the avoidance of the concurrent use of adjacent areas, where possible, will reduce the cumulative impact to some degree but cannot fully mitigate the detrimental effect upon the landscape. In relation to new hedgerow and tree planting, it would take a minimum of five years for the planting to mature sufficiently to contribute to screening. The efficacy of rotation, as a mitigation tool, is limited by the relatively compact nature of the landholding – all of the tunnelled fields are on the same spur of land, not dispersed over a wide area. .

In relation to Garden Field, from a landscape perspective, it is undesirable to have any polytunnels on the south-west facing slopes below Pennoxstone Court, because of the visual prominence of this area, impact on the setting of a parkland of local importance (Pennoxstone) and the fact that mitigation planting would have limited efficacy, due to the elevated nature of the vantage points overlooking this site. However, I acknowledge that Garden Field is one of six sites and that the cumulative adverse impact of the six sites, in combination, has been reduced to some degree, as stated above. In view of this, I consider that it may be considered to be unreasonable to require Garden Field to be excluded from polytunnel use altogether.

With regard to the overall visual impact, I conclude that the polytunnel development is visible from numerous viewpoints from the surrounding, elevated areas, all within the Wye Valley Area of Outstanding Natural Beauty and it will remain visible, albeit with a reduced adverse impact, even if the proposed mitigation measures are implemented. It will cause some harm to the Wye Valley Area of Outstanding Natural Beauty.

With regard to landscape effects; the impact of the proposed development on landscape character, the polytunnel development has an adverse impact on the rural and historic landscape character of the area and on the character of the Wye Valley Area of Outstanding Natural Beauty. The proposed planting will offer a positive benefit in terms of restoring landscape character, albeit this will be a partial restoration of landscape character, due to the limited proposals for new cross-field hedgerows to replace those lost over time.

Accordingly I conclude that the proposed development does not accord with Policy LA1: Areas of Outstanding Beauty of the Unitary Development Plan.

If it is determined that polytunnel development is acceptable in principle on this site, then a condition should be attached requiring the submission of a comprehensive management plan to ensure the successful establishment and maintenance of all the landscape proposals.