

19 June 2018

Mr R. Close
Principal Planning Officer
Planning Services
Herefordshire Council
PO BOX 4
Hereford
HR4 0XH

Dear Mr. Close,

RE: REQUEST FOR A SCREENING AND SCOPING OPINION

PROPOSED ERECTION OF POLYTUNNELS, WATER MANAGEMENT FACILITIES AND SEASONAL WORKER ACCOMMODATION AND FACILITIES ESSENTIAL FOR TABLE-TOP STRAWBERRY PRODUCTION ON LAND AT OCLE PYCHARD, HR1 3QQ.

UNDER THE SCHEDULE 2, DESCRIPTIONS OF DEVELOPMENT AND APPLICABLE THRESHOLDS AND CRITERIA FOR THE PURPOSES OF THE DEFINITION OF "SCHEDULE 2 DEVELOPMENT", ENVIRONMENTAL IMPACT ASSESSMENT (ENGLAND AND WALES) REGULATIONS 2017.

I am writing on behalf of our client, Mr George Leeds to formally request a screening opinion as to whether the proposed development, which includes the erection of permanently, and seasonally covered polytunnels, etc. falls to be within the scope of the Environmental Impact Assessment (England and Wales) Regulations 2017?

These proposals are now the subject of a formal planning application, (ref 182191) following an earlier pre-application enquiry to Herefordshire Planning Authority.

Documents submitted with this formal request for a screening opinion under the provisions of the Environmental Impact Assessment (England and Wales) Regulations 2017 are: -

1. Flood Risk Assessment and Surface Water Management Plan for Agricultural Development. May 2018. Hydro-Logic Services (International) Ltd.
2. Archaeological Desk Based Assessment. May 2018. Border Archaeology Ltd.
3. Economic Impact Assessment. Mid west Planning Ltd. June 2018.
4. Allan Moss of Allan Moss Associates Ltd "Landscape and Visual Impact Assessment (LVIA)" June 2018.
5. Christopher Seabridge and Associates Ltd "Ecological & Resource Protection Assessment". May 2018.

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6. Christopher Seabridge and Associates "Ecological Enhancement & Management Strategy" May 2018.
7. Design and Access Statement. Mid West Planning Ltd. June 2018

The proposal is to erect a series of 8.2m span polytunnels in multi-span blocks on the land outlined in red at Ocle Pychard, as depicted on the plan attached reference Ocle Pychard PL-04. There will be 11 blocks of tunnels (A1 –A8 & A10-A11), with associated access tracks and drainage of surface water to the attenuation ponds.

In summary the proposed development comprises: -

- The erection of 19.71 Ha of polytunnels with all-year round covers.
- The erection of 17.31 Ha of polytunnels with seasonal covers. (Covers on from 1 Feb-15 Nov)
- The development of two surface water attenuation ponds and underground drainage system to convey surface water to them.
- The installation of a closed drainage system including underground storage tanks for collection of water from the table-top growing areas.
- The installation of permeable farm access track network.
- The siting of 72 caravan pitches for seasonal workers with mini sewage treatment plant, and worker facilities within existing farm buildings at Lodge Farm.
- Landscaping, including ecological enhancement measures and the establishment of new apple orchards.
- Erection of a loading bay and infill building for chiller and cold storage at Highway Farm.

The area within the application site is 64.60 Ha. Of this 37.02 Ha will be covered with polytunnels, the remaining 27.58Ha will be used to provide seasonal workers' campsite, worker facilities, cold storage, access tracks, ecological, landscaping and water management enhancement measures.

A prior notification for an irrigation reservoir (180712), and hedgerow removal notification (181510) were made to Herefordshire Council which has effectively given planning consent for the construction of an irrigation reservoir at the Ocle Pychard site. This development is part of the overall scheme for the farm, but it is outside of the planning consent for polytunnel development now sought.

Economic Need and Impact.

An Economic Need and Impact Statement to analyse the economic benefits and impacts of the proposals has been put forward with the planning application. The economic benefits and possible impacts of the proposal to the farming business and to the wider economy, including tourism where affected, has been considered and compared to alternative cropping on the land.

This document describes the economic and employment need of the proposals, including current permanent and seasonal employment levels at the applicant's main Withers Farm, Wellington Heath, Ledbury, and proposals for new permanent and seasonal workers at the Ocle Pychard site.

An assessment of the existing spending from Withers Farm and from the combined existing and proposed local spend as a result of the Ocle Pychard development has been calculated and reported.

The potential impact of the polytunnel and associated infrastructure development has been considered in light of the location and the existing levels of tourism, and found to be minimal, not least because the application site is not within the Herefordshire Area of Outstanding Natural Beauty, and is low lying and well-screened, and therefore the proposal will not have the same magnitude of impact that it otherwise could have had on tourism and visitors to the area who might be particularly interested in the landscape.

Landscape and Visual Impact

Allan Moss is Mr Leeds' Landscape Consultant who initially carried out a Landscape Capacity study of the site, and subsequently produced a full Landscape and Visual Impact Assessment of the development at the site.

The results of the Landscape Capacity Study show that approximately 60% of the land purchased at Ocle Pychard has sufficient capacity to accommodate change (polytunnel development). Some fields score twice due to their changing levels and visibility from public vantage points. The proposed application area at Ocle Pychard was assessed to have a high, medium/high and medium capacity to accept polytunnel development from a landscape character and visual amenity perspective. Only fields and part fields with a medium or higher capacity to accept change have been considered for the proposed polytunnel development because these areas have a low impact on the landscape.

The LVIA assesses the impact of the proposed permanently covered and seasonally covered polytunnel development on the landscape character of the 'Timbered Plateau Farmlands' as being Minor/Moderate to Moderate in the short term, and as Minor and Minor/Moderate in the longer term as the trees and hedges mature. The relative low impact of the development on the landscape is consistent with the findings of the Landscape capacity Study, which shows that the siting of the development is influenced by the landscape.

The LVIA is included as supporting information for this request for a screening and scoping opinion.

Residential Amenity

The Draft Poly tunnels Planning Guide by Herefordshire Council 2017 replaces the 2008 archived SPD "Poly tunnels" which is clear on what is expected to retain and protect residential amenity. To date the applicant has an excellent track record with neighbours at Withers Farm and aims to foster good relations at the new Ocle Pychard site. The archived and draft Herefordshire poly tunnels guidance sets out what the requirements are for residential buffer zones, and that they must be maintained clear of storage and anything connected with the operation of the poly tunnels for the lifetime of the development. The applicant has demonstrated that he is able to comply with this guidance in the design of the site layout and will abide with any reasonable planning conditions that may be attached to a planning consent in this respect.

The applicant has chosen to plant apple orchards between the residential properties to

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the north and east of the proposed polytunnels to provide enhanced buffer zones to the minimum requirements.

Transport and Highways including Public Rights of Way

The location of the proposed polytunnels is well-located on fields with good connectivity to the proposed cold store and dispatch building situated at Highway Farm. This arrangement removes the need to transport produce from the polytunnels by road to the cold store and dispatch building.

Highway Farm yard has until very recently been used in connection with a livestock farm producing beef and sheep. Details of historical vehicle movements are not available from the previous occupant of Highway Farm; however, it is reasonable to assume that there would be regular vehicle movements including, movements of livestock, feed deliveries, hay, straw and silage delivered, and manure carted away from site, as well as vehicle movements associated with people such as vets, salespeople and farm contractors etc. The introduction of table-top strawberry production will displace the livestock farming activities.

Lodge Farm will be the site of the seasonal workers accommodation. Up to 330 seasonal workers will be accommodated in caravans with additional worker facilities contained within the existing farm buildings. Seasonal workers are not allowed to bring private motor cars to the farm. All seasonal workers will be given the opportunity to go to Herford for shopping trips, and for leisure days out by minibus.

Public Rights of Way

The development of polytunnels, attenuation ponds, access tracks and seasonal worker accommodation etc. at the Ocle Pychard site does not result in the need for realignment of the local network of public rights of way. The proposed development has been designed in such a way to fully mitigate the impact of the scheme on the public rights of way.

Polytunnels in field A3 have a wider buffer area along field boundaries where the public bridleway is located and field A9 has been designated for apple orchard planting and as a site for one of the two attenuation ponds. Polytunnels have been kept away from the public footpath (Three Choirs Way) which is located to the south of the farm and to the north of the attenuation pond in field A13, the apple orchard in field A18, and the irrigation reservoir consented under Prior Notification (Ref: - 18/0712).

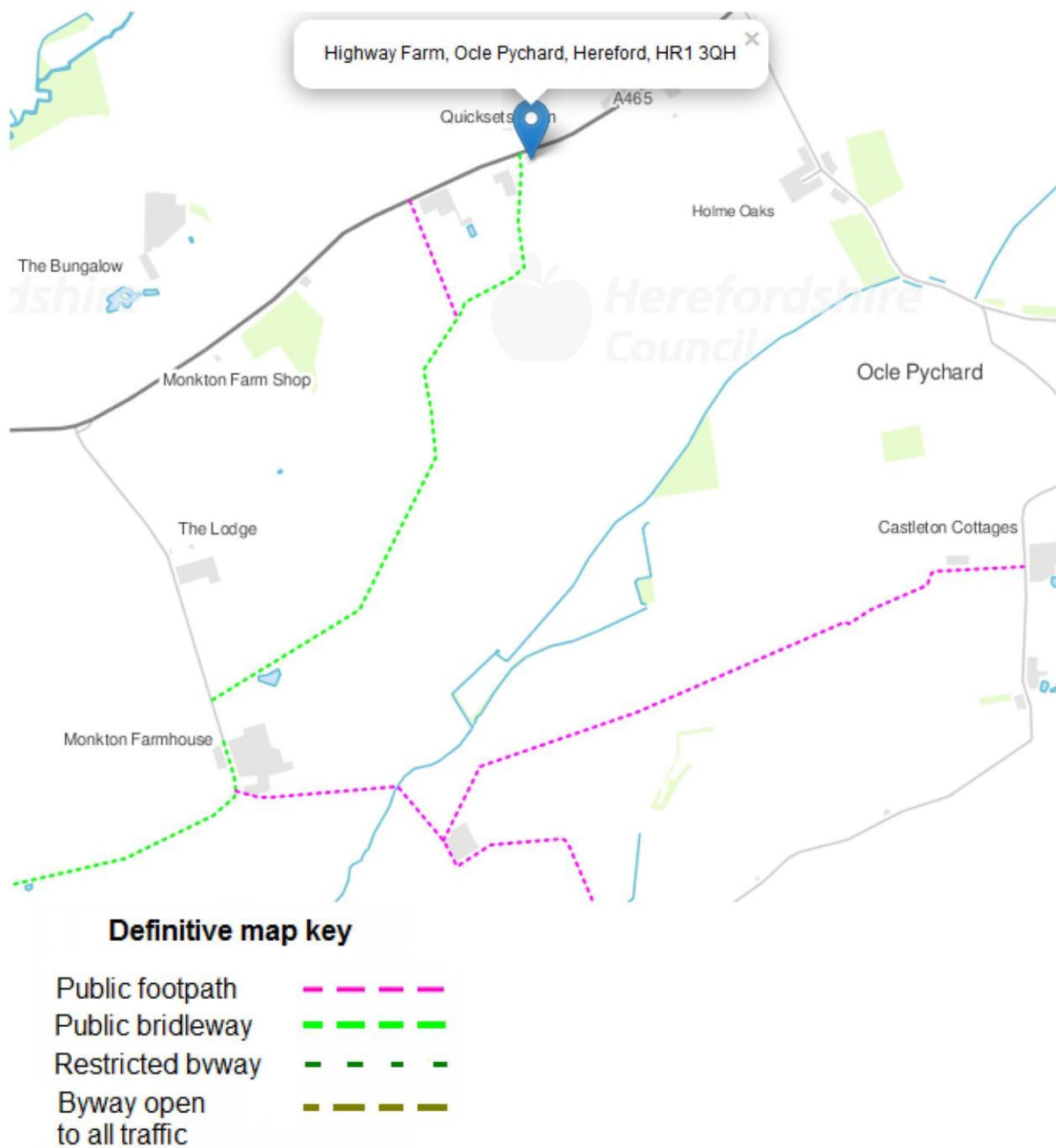


Figure One: - PROW Definitive Map Extract with Key, for the land at Ocle Pychard showing the public bridleway and public footpath routes.

Flood Risk and Surface Water Management

Consultant Hydrologist Bethany Easdon of Hydro-Logic Services (International) Ltd has prepared a comprehensive Flood Risk Assessment (FRA) and Surface Water Management Plan⁴ for the Ocle Pychard polytunnels and associated development proposal. The development applied for is within Flood Zone 1 and therefore has a very low risk of flooding and the Sequential and Exception tests are not required.

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The Flood Risk Assessment provides run-off volumes and a management strategy for the temporary containment of water run-off from the polytunnel covers in two attenuation ponds to prevent adding to the likelihood of flooding downstream of the tributary of the River Lugg, which runs alongside the southern boundary of the application site, in peak rainfall events.

The scheme incorporates the strategic use of French drains, (Please refer to Plan reference Ocle Pychard PL-11 for details) and two attenuation ponds discharging to wetland areas to mitigate flood risk to 1 in 100 year, plus 20% rainfall design, and plus 35% for peak river flows for climate change, in accordance with the recommendations of the NPPF and the Environment Agency, and in accordance with the requirements of local planning policies SS1, SS6, SS7, LD2, SD3 and SD4. The scheme is intended to protect the adjacent tributary of the River Lugg from increased flows as a result of the development, by limiting outflow from the two attenuation ponds to below the greenfield rate of run-off.

In addition to the Flood Risk Assessment, consideration has been given to the protection of natural resources such as soil and water. Chris Seabridge and Associates have recommended the use of buffer zones along vulnerable watercourses and the two attenuation ponds discharge to two wetland areas to reduce the risk of sedimentation and phosphate contamination to the River Lugg Site of Special Scientific Interest (SSSI) and the River Wye SSSI European Special Area of conservation (SAC). Please refer to the, Flood Risk Assessment (FRA) and Surface Water Management Plan for more information.

Mr. Peter Gwynne of Agri-Management Solutions has designed a sealed drainage system to capture water from the table -top strawberry areas within the polytunnels. Any surplus water that could contain fertilizers and pesticides coming from the table-top strawberry growing medium will be segregated from rainwater and conveyed in a separate sealed system to two underground chambers where it will be re-used via the irrigation system. Please refer to Plan reference "Ocle Pychard PL-11" and "Ocle Pychard Sealed Drainage System" plans submitted for more details.

Biodiversity

Christopher Seabridge and Nigel Baskerville of Christopher Seabridge and Associates Ltd have prepared two reports; "Ecological & Resource Protection Assessment"⁸ and "Ecological Enhancement & Management Strategy"⁹ for the project. The ecological report details the existing flora and fauna and wildlife habitat. The Ecological and Resource Protection Assessment concludes that the proposals will not have an adverse impact on protected species. No BAP habitats will be lost, and mature trees and hedges will be protected. The report also considers natural resources such as soils and water, particularly in the context of water run-off potentially having a negative impact on the River Lugg SSSI and River Wye SAC and SSSI.

As part of this assessment they have identified potential impacts the development may have and advised the applicant how to comply with legislation (identified in their report), in particular to mitigate against Diffuse Water Pollution from Agriculture. Potential impacts of the development include soil erosion and contamination of watercourses with fertilizer and pesticides. The year-round covering of a proportion of the polytunnels on the lower lying land (i.e. the land nearest to the watercourse) is considered a positive mitigating factor. In addition, the introduction of buffer zones

along the watercourse and most vulnerable ditches will reduce the risk of contamination of the watercourses by sediment.

Targets set in the Ecological Enhancement & Resource Protection Policy report for habitat creation and enhancements are:

- Establishment 0.12Ha. of new native species woodland.
- Establishment of a replacement native species-rich hedgerow along Highway roadside boundary.
- Translocate existing hedge
- Development of a network of tall and thick hedgerows by year 10.
- Management of a two-year rotational hedge trimming programme across the site to ensure a good crop of blossom and subsequent berries.
- Gaps in hedgerows filled to create continuous stretches of hedgerow corridors.
- A diverse age range of native hedgerow trees in the landscape.
- A range of different aged trees from saplings to mature/veteran.
- Establish 4m wide floristically enhanced buffer strip alongside River Lugg tributary.
- 2 no. x 3m wide floristically enhanced buffer strips alongside ditches.
- Established hedgerows and field margins used as commuting routes to foraging areas further afield
- Establish and manage new wetland plots to a high standard.
- Increase nesting opportunities for farmland birds in areas of field margins, woodland edge, mature trees and hedgerows by installing nest boxes.

Targets set in the report for resource protection are:

- Ensure all rainfall from the polytunnels is managed through a drainage system identified within the Flood Risk Assessment (FRA) and Surface Water Management Plan⁴ to reduce the risk of run-off and soil erosion.
- Annually undertake a risk assessment and actively manage the run-off from the poly tunnels in accordance with the Polytunnel Code of Practice, to reduce the potential of any fertilisers or pesticides used in the cultivation of the fruit crop causing DWPA.
- Manage the polytunnels and access tracks to reduce the potential risk of run-off and soil erosion.

A key element to the scheme is to water run-off in times of heavy rainfall, which otherwise could lead to flooding of the nearby watercourse downstream towards Withington Marsh. The erection of polytunnels can improve water management and reduce the potential for flash flooding by capturing run-off into attenuation ponds. The creation of two attenuation ponds and the establishment of three buffer zones and two wetland areas will help to minimise run-off and provide betterment to wildlife habitat and species protection at the Ocle Pychard site.

Archaeology and Possible Impact on Heritage Assets

Due regard will be had to the proximity of heritage assets that may be affected by the proposals such as listed buildings, ancient monuments and archaeological remains. The applicant has commissioned an Archaeological Desk Based Assessment in the first instance which is included as supporting information for this request for a screening opinion.

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If it is deemed that the proposed development falls within the EIA regulations, please provide a scoping opinion as to the requirements for the Environmental Statement at the same time as replying to this request for a screening opinion.

We look forward to receiving your response within the normal timescale.

Should you have any queries or require further information to deal with this request, then please do not hesitate to contact me.

Yours sincerely

Phil Plant

Phil Plant BSc (Hons) MRICS
Senior Consultant
Mid West Planning Ltd

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7. Design and Access Statement. Mid West Planning Ltd. June 2018
8. Plans: -

LCS-01	1:10 000	A3	Landscape Capacity Study for Poly tunnels
PL -01	1:10 000	A3	Land Ownership Plan
PL -02	1:2500	A0	Location Plan
PL -03	1:2500	A0	Site Plan - As Existing
PL-03A1	:2500	A0	Site Plan - As Existing with Aerial Photo Overlay
PL -04	1:2500	A0	Proposed Layout of Poly tunnels
PL -04A	1:2500	A0	Proposed Layout of Poly tunnels with Aerial Photo Overlay
PL-05	1:2500A0		Landscaping Details

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PL-05A1:2500A0	Landscaping Details with Aerial Photo Overlay
PL -06 1:500 A0	Lodge Farm Seasonal Workers Accommodation
PL -06A 1:500	A0 Lodge Farm Seasonal Workers Accommodation with Aerial
PL -07 1:1250	A2 Lodge Farm Seasonal Workers Accommodation Block Plan
PL -08 1:100	A0 Highway Farm Infill Building (Existing Arrangement)
PL -09 1:100	A0 Highway Farm Infill Building (Proposed Arrangement)
PL -10 1:500	A2 Highway Farmyard Block Plan
PL -10A 1:500	A2 Highway Farmyard Block Plan with Aerial Photograph Overlay
PL-11 1:2500	A0 Proposed Surface Water and Irrigation Run-off Drainage for Poly tunnel Development
PL -12 1:50 A3	Proposed Poly tunnel Cross-Sections