



The countryside charity
Herefordshire

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13 May 2024

Mr Adam Lewis
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Senior Planning Officer
Herefordshire Council
Plough Lane
Hereford
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Dear Mr. Lewis,

Re: Planning Application ref. P240655/F for the erection of polytunnels and associated infrastructure essential for blueberry and cherry production. (part retrospective) on land at Mahollam Road, Huntington, Kington

I am writing on behalf of the Executive Committee of the Herefordshire Branch of CPRE to object to this further application for polytunnels in this area. The last application P221321/F was Refused on 27th October 2023 and the associated one for caravans P221322/F was also Refused. It should be noted that these were part retrospective as is the current one for polytunnels. Currently there is an associated planning application, still undecided, ref. P240298/F, seeking permission to site 18 caravans on land between two of the fields on this site, i.e. between Hawaii and Meadow fields, and again 10 of these '*were placed on site without the necessary permissions*' as noted by the Historic Buildings Officer in his objection to this latter application. We, HCPRE, disapprove of this frequent local practice of using the term 'part retrospective' to facilitate the retention of unauthorised developments. NPPF Para. 59 Enforcement is relevant.

This application is for polytunnels on 'approx.' 2.87 Ha in Meadow Field (blueberries) and 2.09 Ha in Hawaii Field for cherries, both with 'seasonal' covers, those for the blueberries *in situ* from 1st April to 30th September and those for the cherries from 1st April to 31st August. Thus the gleaming polythene covers will be visible throughout the Spring and Summer.

Landscape: Although this is not a designated, protected landscape it is a unique, rural one and should be protected from adverse and intrusive 'semi-industrial' developments. The Landscape Institute states that '*valued landscapes need not be designated*' and that evidence in a case should include '*community based evidence*'; the current strength of the objections from local residents to this and to former applications on this site supply this evidence. The polytunnels are visible from Hergest Ridge, the Hereford Trail, Dysgwylfa Hill to the south-west, Brilley to the south, the Birches Farm to the east on the A4111 and from the southern slopes of Bradnor Hill as well from as the main cluster of dwellings in Huntington. Users of the footpaths in and around Huntington village will see the polytunnels; a Material Consideration in planning decisions is that views from Public Rights of Way should not be adversely affected. NPPF (2023) Policy 15 Conserving and enhancing the natural environment Para. 180 and the current Herefordshire Local Plan Core Strategy (CS) Policies SS6, RA3 and LD1 apply.

Historic Heritage: Additionally there are two Scheduled Ancient Monuments, Huntington Castle, (Grade II listed) approximately 200 m. to the west of the site and Turret Castle (1007314), approximately 525 m. to the south east of the site. The Church at Huntington, St Thomas of Canterbury (1349556) is Grade II* listed. Additionally, there are Grade II listed buildings i.e. Lower House Farmhouse (1082464) and K6 Telephone Kiosk adjacent to the Old Post Office (1111813) at Huntington. Huntington Court in Huntington Park are both Unregistered Parks and Gardens and there are



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10 Grade II listed buildings within Huntington Parish. The Herefordshire Council Polytunnels SPD (July 2018) Guidelines note the impact of polytunnel proposals on the historic environment and reinforce the importance of considering their impact on the character and setting of heritage assets. Also, the ancient field enclosures and woodland areas are still evident and should be protected. NPPF Policy 16 paras. 196, 198, 200 and especially para. 203 c. *the desirability of new development making a positive contribution to local character and distinctiveness* and CS LD4 para. also refer.

Inadequate road network: We note that the Planning Statement details the storage facilities at Lower House Farm for the fruit harvested from these fields. In peak season '*once or twice a day*' it will be taken, by articulated lorry, to the Haygrove packhouse at Ledbury. The residents and visitors in this formerly peaceful hamlet are very aware of the problems arising from the increase in traffic from the activities associated with the intensive polytunnel fruit growing at this site. The roads are narrow and the verges are consequently damaged. We think that the principles of CS Policy MT1 should be considered.

Flood risk and Drainage: the proposals are not clear as regards the layout of the drainage system. The two existing polytunnel sites used by Haygrove Growers already extract water from Gladestry Brook. The River Arrow is a 'spate' water course and the levels can be very low; increased extraction from the Gladestry Brook could endanger the rare white-clawed crayfish. Pollution with the run-off from the polytunnels is another considerable risk, both to these water courses and to the pond where there are great crested newts.

Biodiversity considerations: Intensive fruit growing in polytunnels is not conducive to habitat improvement; despite this it is noted, (para. 7.26 in the Planning Statement) that the 'biodiversity net gain' (BNG) assessment equals 28.16% (where the minimum required is 10% above baseline) and that the scheme will improve the hedgerows and the 'floristic' value of the grassland around the tunnels. However, the Ecological Survey, 4.2 re Habitats notes that '*The proposed site of the polytunnels will occupy approximately 5.6 ha of cherry and blackcurrant crops*. The surrounding modified grassland habitat is considered to be of low conservation value *due to a lack of habitat structural diversity and absence of uncommon/rare plant species*' .. yet the application is for polytunnel protection of cherries and blueberries? An HRA should be submitted, although in the case of the associated caravan application P240298 this is Negative.

Amenity considerations: As stated above the objections detailed in many residents' letters indicate their concerns and detailed observations through living and working at or near Huntington. Additionally, tourism is an important income generator for the B. & Bs. and holiday accommodation facilities but as the countryside is 'damaged' the demand tends to reduce. If the current applications succeed there will be at least 108 more people living, seasonally, in this formerly secluded hamlet; medical, social and educational services are already stretched.

CPRE strives to protect the open countryside and the rural landscape from inappropriate development; the cumulative effect of more polytunnels with the associated seasonal workers accommodation and consequent activities, noise, light and disturbance, at Huntington is detrimental to this idyll. We trust that this application will be Refused.

Yours faithfully,

Virginia Morgan
For PLAN Herefordshire CPRE