



OBJECTION TO APPLICATION TM/08/03739/FL

Erection of agricultural polytunnels on the landholding of
Baron's Place Farm, Mereworth, Kent

Prepared by the Tonbridge and Malling CPRE
Kent District Committee



The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquility and diversity of rural England, by encouraging the sustainable use of land and other natural resources in town and country.

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INTRODUCTION

'CPRE believes that polytunnels have a place in the great diversity of English farmed landscapes. But they have significant effects on landscape, soil and amenity and their construction should be decided transparently, taking into account the wider public interest. Where landscape and amenity interests are strong, polytunnels should not be allowed to cause significant damage to the environment and amenity.'

From the CPRE Policy Position Statement June 2006

There are a number of issues relating to this application that cause sufficient concern that we recommend it's rejection, these include:

1. No definition of terms used in the application
2. Conflicts with existing planning policies relating to rural development
2. Adverse impact on Conservation Areas
4. Loss of Residential Amenity
5. Loss of Landscape Amenity
6. No site plans for proposed structures have been provided
7. No Flood Risk Assessment has been undertaken
8. No Landscape Impact Assessment has been undertaken
9. No waste management plan has been put in place
10. Conclusions

1.0 TERMINOLGY

The application refers to 'rotational' and 'successional' tunnels but gives no definition of these terms or time limit for either to remain in place. It is our understanding however that 'rotational' tunnels are part of a traditional rotation cropping scheme and will be in place for 2 to 5 years while 'successional' tunnels are left in place.

For the purposes of this document 'successional' tunnels will be considered to be permanent structures and 'rotational' tunnels temporary.

1.1

The application claims to 'regularise the existing situation' with the majority of the tunnels being taken down and put up on a rotational basis. The application actually proposes a total of 68 hectares of permanent structures by 2010 which is 39% of the total area of 175 hectares under polythene at any one time. Currently only 9.42 hectares of tunnels have been in place for longer than 5 years and therefore qualify as existing successional tunnels. Therefore the application is asking for an additional 58.58 hectares of permanent structures. This is not regularising the existing situation, it is a significant new development.

2.00 CONFLICTS WITH EXISTING PLANNING POLICIES

2.1

Although there is a presumption in favour of agricultural buildings in Green Belt, this does not remove the obligations in PPG2

'The visual amenities of the Green Belt should not be injured by proposals for development within or conspicuous from the Green Belt which, although they would not prejudice the purposes of including land in Green Belts, might be visually detrimental by reason of their siting, materials or design.'

'To retain attractive landscapes, and enhance landscapes, near to where people live'

The tunnels with their associated infrastructure are visually detrimental by reason of their siting, materials and design. They are also adjacent to residential dwellings and close to village centres.

2.2

Some of the farm falls within a Special landscape Area covered by Policy EN5 of the Kent and Medway Structure Plan.

POLICY EN1 of KMSP requires that *'development in the countryside should seek to maintain or enhance it. Development which will adversely affect the countryside will not be permitted unless there is an overriding need for it which outweighs the need to protect the countryside*

POLICY EN3 of KMSP *Kent's landscape and wildlife habitats will be protected, conserved and enhanced. Development will not be permitted if it would lead to the loss of features or habitats which are of landscape, historic, wildlife or geological importance...*

Where a need for development in the countryside is justified, important features will be retained. Proposals should reflect the need for conservation, reinforcement, restoration or creation of countryside character and provide for appropriate management of important features and the wider landscape.

The proposed development will not conserve and enhance habitat. No justification for the development has been provided.

2.3

Policy CP1(3) of the LDF requires that the *'need for development be balanced against the need to protect and enhance the natural and built environment. In selecting locations for development and determining planning applications the quality of the natural and historic environment, the countryside, residential amenity and land, air and water quality will be preserved and, wherever possible, enhanced.'*

No evaluation of the impact of the application has been made in relation to the natural and historic environment or residential amenity. Currently and in the past polytunnels have been erected within a few metres of the boundaries of residential properties in contravention of industry guidelines produced by the NFU and the Soft Fruit growers Association.

2.4

POLICY CP14 Restricts development in the countryside to that which is necessary to:

secure the viability of a farm, provided it forms part of a comprehensive farm diversification scheme supported by a business case;

inappropriate development which is otherwise acceptable within the terms of this policy will still be need to be justified by very special circumstances.

We understand that the farm is currently viable and this proposal represents intensification rather than diversification. No special circumstances have been cited, neither has a business case been made to support the extension of polytunnel use proposed in the application.

2.5

PPS7 deals with sustainable development in rural areas

PPS7 para 1. (vi) *All development in rural areas should be well designed and inclusive, in keeping and scale with its location, and sensitive to the character of the countryside and local distinctiveness.*

The large scale polytunnel operation and the development of permanent tunnels with their associated infrastructure including irrigation systems, reservoirs with no landscaping or planting schemes, large dumps of used growbags and plastic sheeting fails to comply with the above.

PPS7 PARA 15. Recognises the importance of traditional land based activities:

Planning policies should provide a positive framework for facilitating sustainable development that supports traditional land-based activities and makes the most of new leisure and recreational opportunities that require a countryside location.

However, this paragraph also makes clear that any such development should also respect the quality and character of the wider countryside.

Planning authorities should continue to ensure that the quality and character of the wider countryside is protected and, where possible, enhanced. They should have particular regard to any areas that have been statutorily designated for their landscape, wildlife or historic qualities where greater priority should be given to restraint of potentially damaging development.

This development degrades rather than enhances the quality and character of the wider countryside, part of the development is also within a Special Landscape Area as defined in the KMSP.

2.6

The application identifies a total of 73.86 Ha for 'successional' or permanent tunnels by 2010. If strawberries are grown in the same ground over many years, fertility decreases and soil borne disease that affects the roots increases. For this reason conventional rotation is used which necessitates the removal of the tunnels. Not only is this a costly, labour intensive operation but the other rotating crops have a lower profit margin. However, by using permanent tunnels and changing the growing medium it is possible to grow strawberries continuously in the same location.

Several fields of permanent tunnels are already in use for a grow bag operation, some on 'table tops' and if successful the applicant will be able to extend this to a total of 68 Ha. The strawberries are grown in bags of coir in which nutrients are fed to the plants via the irrigation system. This type of operation raises the grow bags to waist height on trestles to improve harvesting efficiency. It is also far more visually intrusive than ground level growing when the covers are removed. Permanent structures of this nature that are not using the soil as growing medium are an inappropriate development on high grade agricultural land in the green belt.

PPS7 Para 28 states:

The presence of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification), should be taken into account alongside other sustainability considerations (e.g. biodiversity; the quality and character of the landscape; its amenity value or heritage interest; accessibility to infrastructure, workforce and markets; maintaining viable communities; and the protection of natural resources when determining planning applications,

Where significant development of agricultural land is unavoidable, local planning authorities should seek to use areas of poorer quality land (grades 3b, 4 and 5) in preference to that of a higher quality, except where this would be inconsistent with other sustainability considerations. Little weight in agricultural terms should be given to the loss of agricultural land in grades 3b, 4 and 5, except in areas (such as uplands) where particular agricultural practices may themselves contribute in some special way to the quality and character of the environment or the local economy. If any undeveloped agricultural land needs to be developed, any adverse effects on the environment should be minimised.

The proposed development on agricultural land is not unavoidable as the land is currently suitable for growing strawberries and a range of other crops as part of a viable agricultural enterprise.

The erection of permanent tunnels represents a loss of 73.6 hectares of high grade agricultural land and will have a significant impact on biodiversity; the quality and character of the landscape; its amenity value and heritage interest

3.00 ADVERSE AFFECT ON CONSERVATION AREAS

KMSP Policy QL6 states: *'Development which would harm the character or appearance of a Conservation area will not be permitted'*

KMSP para 5.11 enlarges on this: *'It is important to take into account the impact of proposals outside Conservation Areas where these might affect important views in and out of such areas'*

KMSP Policy QL8 states: *Listed buildings will be preserved and their architectural and historic integrity and the character of their settings will be protected and enhanced. Development which will adversely affect them will not be permitted.*

KMSP para. 5.21 enlarges on this: *'the settings of historic landscapes and views in to and out of, them are also important and should be protected'*

These two policies are interconnected as most of the listed buildings concerned are within conservation areas. Roydon & St Michael's, West Peckham and Mereworth Castle are all conservation areas that adjoin land that has been identified for polytunnels in the application. No buffer zones have been specified contrary to claims in the application.

3.1

Roydon conservation area surrounds Church Bank Field on three sides and the southern edge of the field abuts a row of cottages, the Greensand Way long distance path also passes through it.. There is no indication of a 'buffer zone' as proposed in the application. The fields Colonels and Old Ley are also clearly visible from the conservation area as are the more distant fields of Stanfords and those on the hillside above West Peckham.

3.2

West Peckham conservation area encompasses the village centre and the properties along the south side of Mereworth Road. The village is a cul de sac opening out onto a pleasant green bordered by the 16th Century Swan Public house and 10th Century Church of St Dunstan's to the East. The opposite side of the green is marked by a hedge beyond which is open farmland containing a small number of houses and cottages. This openness is a unique feature of the village, it has no defining boundary to the west but open fields punctuated by a number of residential dwellings. Further west is the parkland and conservation area of Oxonhoath.

Nine Acre Field abuts the conservation area and tunnels in this field and in Bottom Arnolds are clearly visible from the village green as is the field Stan Lane. Apart from one field immediately to the east of the green which is not in the ownership of Hugh Lowe Farms all the other fields to the north, east and south of the village are designated for tunnels.

In addition, those to the north west and south west are designated for permanent tunnels not in a rotational scheme. It is our understanding that there are plans to use these for table top growing. This requires additional infrastructure inside the tunnels in the form of trestles on which grow bags are placed in which strawberries are grown. In the winter even with the plastic covers removed this form of growing is highly visually intrusive.

Together with the two reservoirs we consider that the application represents an unacceptable level of visual intrusion which seriously compromises the setting of West Peckham conservation area.

3.3

Mereworth Castle Conservation Area is generally unaffected by the application although the formal drive to the north of Wateringbury Road abuts fields designated for polytunnels along its entire western edge.

4.00 LOSS OF RESIDENTIAL AMENITY

There are residential properties in the parishes of Mereworth, West Peckham and East Peckham that adjoin fields used for polytunnels. These properties suffer an impact on their residential amenity through loss of view, glare from the plastic coverings and the noise generated by wind and rain on the tunnels. Early morning disturbance includes the noise made by pickers together with the buses and minibuses they arrive in and tractors moving pallets of picked strawberries.

This is exacerbated by the applicant not adhering to current industry codes of practice in relation to the recommended distance between polytunnels and residential properties.

5.00 LOSS OF LANDSCAPE AMENITY

Paragraph 6.4.17 of the Core Strategy states

The Borough contains some significant tourist attractions. These include the AONB, many historic buildings, attractive villages and various visitor attractions. Tourism is a major contributor to the local economy, providing a source of income, employment and activities. The importance of tourism is reflected in the West Kent Area Investment Framework and Local Area Agreement. Policies TSR2, TSR4, TSR5 and TSR6 of the South East Plan apply to tourism development.

Two long distance footpaths, The Weald Way and The Greensand Way, pass through much of the area in which it is proposed to erect permanent and temporary structures and there is a network of local paths which render the surrounding area open and accessible. These pass through a varied and unspoilt landscape including open farmland, woodlands and the steep slopes of the Greensand Ridge. A part of the TMBC Quiet Lanes network also passes through the area. The south facing slope of the Greensand Ridge is defined as a Special landscape Area in the KMSP and rises steeply to the wooded fringe of Mereworth Hurst which affords striking views south across the Medway plain to the High Weald.

The South East Toll Ride long distance bridleway also runs through land identified in the proposal. In addition there are many other bridleways making the area very popular for horse riding, particularly as there is easy access to Mereworth Hurst.

West Peckham is a well known beauty spot, the quality and accessibility of the surrounding unspoilt countryside makes it a popular destination for the casual visitor and serious walker alike.

The proposed polytunnel operation will have a detrimental impact on enjoyment of the landscape, it affects not only long distance views but also the 'ground level experience', passing through the tunnels on foot, bicycle or horseback. The local network of both long distance and local footpaths are very well used and are an asset to Public Houses and other local businesses. The proposals could undermine tourism in the area and have an adverse effect on these businesses.

6.00 SITE PLANS

No site plans have been provided showing the position of the proposed permanent and temporary structures in relation to existing residential properties, boundaries or other landscape features.

The plans that have been provided for the tunnels are inaccurate and misleading because they fail to show the frames that are attached to the front of the permanent tunnels, which present a much more solid and bulky appearance.

It is also stated that polythene sheet is applied to the curved surfaces only. In fact many are totally enclosed on the sides as well as the ends which also increases the visual impact.

The tunnels are covered with sheeting of an opaque white appearance, not clear plastic as stated in the application.

7.00 FLOOD RISK

No Flood Risk Assessment has been undertaken. The polytunnels proposed in this application will render significant areas of land impervious to water absorption.

8.00 LANDSCAPE IMPACT ASSESSMENT

No Landscape Impact Assessment has been undertaken along the guidelines of the Landscape Institute and Institute of Environmental Management and Assessment. This is essential for a development of this scale in a sensitive rural location which affects the setting of three conservation areas and a significant number of listed buildings.

9.00 WASTE MANAGEMENT PLAN

Recent judgements in the European Courts bring agriculture into The Waste Management Regulations 2006. All waste produced by farming, including plastics, is now classified as Industrial Controlled Waste.

Waste can only be stored on the farm for up to 12 months and there is an absolute duty of care defined in section 34 of the Environmental Protection Act to prevent the escape of controlled waste. There is evidence that the current polytunnel operation has caused a significant escape of plastic waste into the environment.

Although large quantities of waste plastic and used growbags are produced the application contains no waste management plan. Licensed exemptions may be necessary for reprocessing or recovery of used grow bag material.

KMSP Policy WM3 States: *Development proposals will be required to demonstrate they are able to make a contribution to reducing growth in the volume of waste generated in Kent.*

KMSP Policy WM3 (1): *...requiring the submission of a waste minimisation and recycling plan alongside major development proposals*

10.00 CONCLUSIONS

The application does not regularise current practice but seeks to extend the scale of the operation.

Such a large area of polytunnels in the Metropolitan Green Belt and partially in a Special Landscape Area represents a significant development. Of particular concern are the proposals for permanent tunnels on such a large scale.

Similar scale applications that have been granted elsewhere require the removal of all tunnels and parts of tunnels on a regular basis. eg: every year in Brierely Farm, Surrey and every two years in the Arrow Valley in Herefordshire.

Permission for any rotational or temporary tunnels should be conditional upon a Flood Risk Assessment and Landscape Impact Assessment being commissioned and any resulting mitigation work being completed before consent is granted.

Any permissions should be conditional on the establishment of a waste management plan together with measures to prevent the escape of controlled waste.

If any permissions are granted there should be conditions placed on the length of time that any tunnels can remain in place.

The applicant should be required to provide site plans for each field demonstrating that the siting of tunnels respects residential properties and sensitive areas in accordance with industry codes of practice.

The erection of permanent structures covering 68 hectares constitutes an unacceptable level of development in the Green Belt. Any proposal for 'successional' tunnels should be rejected.

PROXIMITY TO CONSERVATION AREAS

-  Fields designated for temporary tunnels
-  Fields designated for permanent tunnels
-  Conservation Areas
-  Greensand Way
-  Weald Way



Mereworth Castle Conservation Area continues to the north of the A26 where it is abuted along it's entire length by fields designated for polytunnels



St Michael's Church and Roydon Conservation area surrounds Church Bank field on three sides. The southernmost edge of the field also abuts four residential properties



The entire western side of West Peckham Conservation Area is surrounded by fields designated for polytunnels.

VIEWS FROM CONSERVATION AREAS



North from West Peckham village green



North West from West Peckham village green



South west from St Michael's Church

VISUAL IMPACT IN WINTER



Polytunnels have a high visual impact with and without the polythene covers. In winter there is no foliage on hedges and trees to screen the fields.

Pedlam Brook field in February with no frames or covers



Old Platt in February



9 Acres in February from the Greensand and Weald Ways



Strakes in February

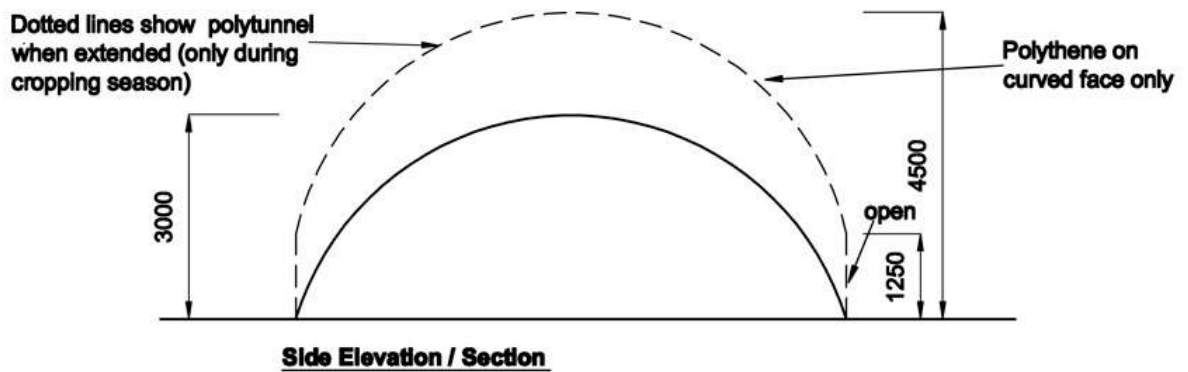
TABLE TOP GROWING



The use of permanent tunnels for trestle growing systems is particularly visually intrusive. The removal of the covers in winter reveals the galvanised steel frames, plastic bags and irrigation systems. A sea of white plastic appears to hover above the ground at waist height.



PLANS



The plans submitted do not correspond with the tunnels actually in use and are therefore misleading. Some of the tunnels are fitted with large square frames at the ends which are visually more intrusive than the plans suggest. Although the plans clearly state that polythene is on the curved face only, the picture below at 9 acres clearly shows it on the vertical sides and across the front, presenting a solid wall of plastic. The plans claim the plastic is clear when in fact it is opaque white which causes significant glare and is very intrusive.



PLASTIC WASTE IN THE ENVIRONMENT



Rolls of waste plastic in fields



Stacks of used growbags



Plastic shreds litter all the fields that have been used for polytunnels. (above)The Weald Way crossing 'Hadlow Road' field. (right) It also escapes into the wider environment - the Greensand Way



Field margin Stan lane