

Polytunnels Supplementary Planning Document		
Schedule of Comments Received from Consultees to Draft Consultation and Council's Response		
Name	Comments Made	Council Response
General Comments		
Leintwardine Group Parish Council	Dust and pollution should be minimised.	
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	The NFU are concerned about the length of the document and the number of supplementary guidelines within it. Normal planning considerations have been omitted such as public rights of way, highway safety and archaeology.	The SPD has addressed the many issues that may need to be considered in any polytunnel development. This has included public rights of way, highways safety and archaeology.
	The SPD should avoid emotive vocabulary, which evokes quite misleading connotations and factually incorrect statements.	Noted. The SPD has been written in a balanced manner to fairly reflect the issues that need to be addressed. Incorrect and misleading statements will be corrected.
Gary Woodman - Chamber of Commerce	The chamber is concerned with the balance of the overall document, statements like 'industrial scale' and cost effective greenhouses' are not helpful or correct in their description of the operation.	Acknowledged. These statements are proposed for change
Mr N J Cockburn - Grower	Several items such as footpaths, traffic, unregistered parks among others are already dealt with as normal planning considerations elsewhere and are being duplicated here.	The SPD sets out the planning issues in summary and later in more detail linking the necessary planning policies that need to be considered.
Aubrey Green - Arrow Valley Residents Association	Absent: No commentary or guidelines on accommodation to serve the polytunnels. Without accommodation for workers and ancillary buildings polytunnels cannot operate. It is a significant oversight not to connect these issues within a single SPD. Nor any mention of sewage effluent disposal from accommodation. Water samples should be taken at the entry point into rivers, water courses by DEFRA / EA at a minimum of monthly intervals.	Planning policy guidance for associated buildings is guided by both national and local planning policies and is therefore not covered in this document.
Duncan McCallum - DPDS Region	Many of the requirements in terms of ecology, archaeology etc are requirements of any planning application and it should be made clear that the requirements in the SPD are all inclusive and that information will be required in relation to any material consideration in any particular case, which may be in excess of the SPD.	Noted, the SPD identifies all possible issues that a proposal may need to consider. Each application will need to be considered on their merits

Frank Hemming - Resident	I have not found a definition of sustainability in these documents. I have found the following definition of a sustainable society useful. "A sustainable society is one that can persist over generations, one that is far seeing enough, flexible enough, and wise enough not to undermine its physical, biological or social support systems." This is a definition I will try to apply.	Noted.
Mike Price - GOWM	I note that you have followed the advice given to local planning authorities by the Chief Planner in his letter of 25 July 2007 and that applications will be considered on their merits. It is helpful to set out when planning applications will be required, what information will be needed in a planning application and the criteria which the Council will take into account when considering applications.	Noted. Section 2 is proposed for change to help simplify when planning permission will be required. The information that may be required to accompany an application is set out in Section 5.
	The draft document sets this out and contains a good deal of back ground information on the reasons for managing the provision of polytunnels in a particular way. The final document may benefit from having the background information in appendices. I think that the document, at the moment, is complicated and that in drawing up the final version it would be of benefit if it were structured to address the following issues, in order:-Is planning permission required? The information the LPA requires with a planning application (with a clear statement of reasons); The criteria by which applications will be considered.	Noted. There are many issues that need to be covered within this document. The Council intends to provide a summary sheet for applicants.
Justin Burnett (on behalf of Mark Davies) - Environment Agency West Area Planning	We are generally satisfied with the content of the SPD given that it has been produced further to the consideration of our previous comments on the draft documents.	Noted.
	It should be noted that we are currently in the process of preparing a 'guidance document' on the above which we anticipate will outline suitable techniques and be of assistance for those proposing polytunnel development. We would look to make this available following any publication, which could be a document of reference in the future.	Noted, however no data available to include within SPD.
Donna Tavernor - CLA West Midlands	Whilst we recognize that polytunnels are not pretty, they are producing food for local and national consumption and through the profitability of the grower, providing resources to maintain the landscape.	Noted.
	CLA are pleased to see that the local planning authority want to assist application by having pre application discussions so that any issues can be identified at an early stage and any information required can be collected.	Noted.
James Dodds - JDIH Envireau	Details on hard copy of runoff system.	Noted.
Guidelines 7, 8, 9 & 10		

Mr Peter Huyton - Resident	Are good and should not be changed.	Noted.
Paragraph 1.1		
Aubrey Green - Arrow Valley Residents Association	"With the use of polytunnels for agricultural soft fruit production expected to rise...." What is the basis for this supposition?	Noted. Wording proposed for change.
Mr A Fraser - Marden Resident	"Correct English to read Herefordshire Council has prepared...."	Correction.
Paragraph 1.2		
Mr A Fraser - Marden Resident	In general the document needs to indicate what it shall require in definitive statements in case an appellant should appeal a decision.	Eash application will be judged on a case by case basis. Wording in this para. is sufficient.
Paragraph 1.5		
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	This paragraph refers to polytunnels as 'cost effective greenhouses'. This phrase is misleading as the document does go on to say that they may take various forms. It would be more accurate to state that they are used for crop protection, particularly from the rain.	Agreed. Wording proposed for change.
Paragraph 1.6		
Gary Woodman - Chamber of Commerce	Without the use of polytunnels, as crop protectors, soft fruit production would not be viable in the UK's Climate.	Agreed. Wording proposed for change.
Mr N J Cockburn - Grower	The main use, i.e. protection from the weather is not mentioned at all and should be rectified. There is no 'industrial scale' use of tunnels, this sort of language is emotive and should be changed to large scale.	Agreed. Wording proposed for change.
Graham Biggs - South Herefordshire Growers Group	Industrial is not a term to be associated with polytunnel farming, in fact to many it would be an insult. Please see NFU response.	Agreed. Wording proposed for change.
Donna Tavernor - CLA West Midlands	Soft fruit and vegetable production benefit from the use of polytunnels which create a micro-environment around the plants, allows for more manageable production taking out the vagaries of the weather, preventing mud-splash and the need to spray fungicides and other crop protection chemicals. It also means that harvesting continues uninterrupted throughout the season in reasonable working conditions.	Acknowledged. Wording proposed for change.
Paragraph 1.7		

Mr A Fraser - Marden Resident	All cross references used refer to 2005, there must be other, more up to date information, and that should be used. It is all very well stating that polytunnels cover 2% of the cropping land but that gives a disproportionate impression to the overall effect, particularly if you live in Marden where the village is virtually surrounded by them. This statement should be removed. It would be more acceptable if you stated that the intention was to ensure that the use of polytunnels was not to the detriment of the local community whilst allowing farmers to grow crops under polytunnels.	Acknowledged. Wherever available and possible more up to date data will be used.
Nick Evans - Uni of Worcs and CRC	The SPD quotes figures referring to 2004 at the latest. These are dated. The Briefing Note Theme 1 paper from the workshop at the University of Worcester held in January 2008 contains figures derived from Defra's 2007 Survey of Agriculture and Horticulture and the 2006 Glasshouse Survey, demonstrating that more recent data are available. A copy is available on request.	Acknowledged. Latest figures are proposed.
	Reference to the area of crop production in the UK is not relevant given that this incorporates all arable land. This could be grossly misleading as soft fruit production constitutes a very minor percentage of cropland in England.	Agreed. Change proposed.
Paragraph 1.8		
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	This para implies that all growers are moving towards tabletop production and is therefore misleading.	Acknowledged. Wording proposed for change.
Mr N J Cockburn - Grower	There is very little movement towards Tabletop production, it is quite rare. Nutrients not pesticides are provided to the crop in the same way as soil grown plants.	Acknowledged. Wording proposed for change.
Aubrey Green - Arrow Valley Residents Association	Hereford Council need to assess the commercial health of companies proposing table top polytunnels with a ten year payback. Table top polytunnels should not be sited on agricultural land. They should be sited on brownfield sites. Limited reference of Tuesley Farm. Given this High Court judgement applied the generic tests in the three legal precedents highlighted this is a surprising omission.	Comments noted. However It is not felt appropriate to restrict table top growing from agricultural land and using brownfield sites only. Tuesley Farm is detailed at the beginning of the SPD.
Duncan McCallum - DPDS Region	This section is misleading and irrelevant. The need for planning permission does not arise from table top growing or other production methods. The paragraphs may be misunderstood to mean that need for planning permission arises or the SPD refers only to polytunnels where such methods are used and should be omitted.	Noted. This section only acknowledges the table top method of growing. Any development that relies upon farm scale polytunnels that meet the tests will require planning permission.

Frank Hemming - Resident	If "table top" methods are used, is this agriculture or industry? Why Herefordshire as there is no gain from using the soil? The substrates are all unsustainable over generations.	Noted.
Hayley Pankhurst - Natural England	Natural England welcomes the inclusion of a section on 'Table Top and Raised Bed Growing' (1.8-1.10). This growing method offers the potential to benefit water management; growing the crop off the ground allows the natural processes of infiltration to take place unaffected. This growing method could also reduce landscape and visual impacts. Table top growing requires less land and reduces the need for rotation, meaning that polytunnels can be located in the least sensitive areas both in the landscape as a whole, by de-coupling the need to locate polytunnels on the most suitable soils, and within an individual site.	Noted. Further information proposed.
Paragraph 1.9		
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	A reference source is needed for the statement, 'at least 10 years production is needed to recoup the cost of installing the table top growing infrastructure.'	Noted. Sentence proposed for deletion.
Mr A Fraser - Marden Resident	I do not dispute the fact that table-top growing is an expensive investment and that farmers will require some years of successful production to recoup the costs. However, I do not believe it is advisable to quote a 10 year period in this SPD as applicants will ask for 10 years as a minimum rather than really looking at the minimum timescale required.	Noted. Sentence proposed for deletion.
Paragraph 1.10		
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	The Council makes a good point that the plants are not 'soil dependent'. They could therefore be grown on urban brown field sites close to labour and distribution centres.	Noted. See also response above.
	The substrate used is probably peat-based. DEFRA and The National Trust for example both have strong policies to discourage the continued use of peat. The accompanying text was taken from DEFRA web site on 17 July 2008: www.defra.gov.uk/hort/peat/index.htm - 'Peat is a major constituent of most horticultural growing'. Herefordshire Council should investigate further before approving table top production using peat-based substrates.	Noted. However the use of peat based concentrates is not a planning matter.
Mr A Fraser - Marden Resident	Although table-top growing on a given site may be for more than 3 or 4 years I see no reason to call it permanent; firstly because it conflicts with the previous paragraph and, secondly, because a defined number of years is not, by definition, permanent.	Agreed. Change proposed..

Nick Evans - Uni of Worcs and CRC	'dependant' should be 'dependent'. Also Para 4.33.	Correction.
Paragraph 2.1		
Duncan McCallum - DPDS Region	This section is extremely confusing and would leave many people with no idea whether planning permission is needed or not. The diagram does not help and there is no explanation of what the development rights consist of. There is no reason why reference should not be made to the relevant part of the GPDO and a link to a website is inadequate since document links frequently change. It is not complicated to explain what the PD rights are.	Acknowledged. Whilst the issue as to whether a development requires planning permission is complex it is agreed that this section is too complicated. Section 2 is proposed for change to simplify.
Paragraph 2.3		
B G Mann - Marden Resident	Metal bars put into soil are not permanence.	The degree of permanence is to be considered on a case by case basis.
Mike Price - GOWM	I also note that the SPD relates to policies within the adopted UDP.	Noted.
Nick Evans - Uni of Worcs and CRC	'size' should surely make some reference to the area covered.	The SPD refers to the farm scale forms of development as needing permission. No size limit is being applied. Each proposal will need to be considered on its merits.
Paragraph 2.4		
Mr A Fraser - Marden Resident	A polytunnel is 3-dimensional, as is the overall site. At no stage has any definition been attempted to define if all polytunnels, from those just 8 inches to 1 foot high up to 10 or 12 feet are all defined as polytunnels and fall within this SPD. Area is mentioned later in the document but there is no mention of height. At present it is understood that farmers consider that the low level tunnels are not implicated by this SPD. Clarification is required. My view is that all tunnels must be included. I also think that the reference to concrete is not wise as it provides yet another argument to avoid the regulations. Delete the reference to concrete.	Whilst change is proposed to clarify developments requiring planning permission, this SPD makes clear that it is intended to address the farm scale commercial polytunnels. It is these larger scale structures that cause concern. Further change to delete bracketed examples.
Donna Tavernor - CLA West Midlands	Concerns the issue as to whether polytunnels require planning permission. The CLA would like paragraph 2.4 to clarify the legal situation. It is the CLA stance that planning does not apply to all forms of polytunnels.	Changes are proposed to clarify where permission will be required. The legal requirements are set around the tests derived from case study. Not all forms of polytunnel requires permission.

Paragraph 2.5		
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	Clarification by Mr. Justice Sullivan in Tuesley Farm Appeal case (15.12.06) that those polytunnels did constitute development.	Noted.
Donna Tavernor - CLA West Midlands	The Hall Hunter-Tuesley Farm case, which has in part led to the HCC draft SPD, was clearly only concerned with "Spanish" polytunnels and described by "one manufacturer as "large walk-in plastic tunnels" (para 22 Inspector's decision) i.e. 'commercial polytunnels'. In addition the inspector in the Tuesley Farm case set out at paragraph 45 that many councils consider that "portable polytunnels do not require planning permission". The inspector went on to list a number of items brought on to agricultural land which he states "clearly are not buildings". The list cited in paragraph 45 is as follows: ""low tunnels", "French" tunnels, covers for cherries, pig arks, chicken houses, cloches, huts for agricultural uses, hop poles and polythene sheeting, nets and fleeces used for covering plants at ground level"". Lastly, the Government recently published circular 04/08 entitled Planning-Related Fees in April and the relevant extract is set out below on page 8. The section highlighted in bold suggests that the Government recognize that not all polytunnels require planning permission.	Changes are proposed to clarify where permission will be required. The legal requirements are set around the tests derived from case study. Not all forms of polytunnel requires permission.
Paragraph 2.6		
Donna Tavernor - CLA West Midlands	CLA would like to see paragraph 2.6 setting out exactly which polytunnels involve development, and hence require planning permission, and which don't, so that a layman can understand the SPD so as not to lead to confusion.	Examples of polytunnels that do not require planning permission are proposed to be included in the re-written section. It is not possible to specify exactly which developments will require permission. This will be decided by the tests previously referred.
Paragraph 2.7		
Aubrey Green - Arrow Valley Residents Association	"Ideally planning applications for polytunnels should also include.....". This is a passive statement. AVRA holds this measure should be mandatory.	Acknowledged. The full extent of polytunnel development and associated requirements are encouraged to be considered early i.e. whole farm plans, so that the full extent of the proposal can be considered. This however cannot be made mandatory.

	<p>“Comprehensive assessment” should also consider the transportation of the workers to the polytunnels, i.e., accommodation should be at the point of work not on a satellite & hub system.</p>	Noted. Whilst accommodation should be at or close to the point of work this SPD is primarily to deal with the polytunnels themselves.
	<p>Ideally should be "must". If workers accommodation can be justified by their need to serve the polytunnels, then the corollary is also true.</p>	Noted.
Paragraph 2.8		
Mr A Fraser - Marden Resident	<p>I agree with the implications of this paragraph, but to be consistent with section 5, I believe you should require that all polytunnels development requiring associated buildings and other services must be submitted together as per the Whole Farm concept identified in section 5.</p>	Acknowledged. Whilst this cannot be mandatory, change is proposed to refer to the cumulative effect of development as a whole.
Nick Evans - Uni of Worcs and CRC	<p>Flow Diagram - this is rather too general, lacking definition (e.g. what constitutes 'development') to offer practical guidance and should be removed or revised to incorporate more specific detail.</p>	Flow diagram is proposed for deletion. See also proposed changes to this section.
Hayley Pankhurst - Natural England	<p>To increase clarity for applicants this section should include a reference to the potential removal of permitted development rights within an AONB. This removal could be due to Article 4 Directives (from the GDPO) or to classification as Article 5 land (which all land within an AONB is). While Article 5 status does not remove the majority of Agricultural permitted development rights, it will be relevant to ancillary uses which may ordinarily be permitted development but may not be within an AONB.</p>	Noted. This section is proposed for change to help simplify the requirements around planning permission. Addition of further detail as suggested would not assist this clarification.
Paragraph 2.9		
Leintwardine Group Parish Council	<p>Accessory buildings should be of good quality and not detrimental to the surroundings</p>	Noted and agreed.
Aubrey Green - Arrow Valley Residents Association	<p>Storage should be specified particularly for hazardous materials with bunds where necessary rather than a catch all in utility buildings.</p>	Noted. Storage facilities proposed to be included.
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	<p>Specific details must be part of any planning application where polytunnel use involves worker accommodation. Seasonal exceptions only apply where the caravans/mobile homes are totally removed between the seasons. 'Ideally' is too loose an expression. All the ancillary details should be specifically detailed in any large-scale polytunnel planning application.</p>	Acknowledged. Change proposed.

Duncan McCallum - DPDS Region	In most cases information will be required on the employee accommodation and facilities, irrigation works, etc to assess the impact in the same way as it is for traffic, flood risk etc and the Council would be acting negligently if it determined applications without this information. The paragraphs can be considerably stronger. If this level of guidance is to be given in a supplementary planning document, there should be reference to the likely need for environmental impact assessment of proposals in this section, (headed Planning Control) and guidance given on the circumstances where this is likely to be required.	Information to be submitted with any application is set out in Section 5. A full environmental impact assessment is not a requirement under the regulations.
Martin Field Clerk Bodenham Parish Council	Seasonal workers accommodation should be defined more clearly , e.g.caravans, dedicated buildings, portakabins, accommodation pods etc. Applications should contain details of the full extent of the proposed development as the "polytunnels first" approach does not allow a judgement to be made with full knowledge of the scale of the development from the outset. "Creeping" development has led to many of the past problems with this form of cultivation.	Acknowledged. Changes are proposed to gain an understanding of the full extent of development proposed.
Donna Tavernor - CLA West Midlands	Therefore in Paragraph 2.9 5th line planning applications for polytunnels – include 'if required' after polytunnels.	Noted but no change though necessary.
Hayley Pankhurst - Natural England	We also welcome the draft SPDs recommendation that associated development be included in the polytunnel application, and strongly recommend that this is the case. The inclusion of associated development in the application will allow for better consideration of total impacts and the incorporation of integrated solutions, such as water management which includes runoff from the site and sewage disposal. In addition, we suggest that the inclusion of associated development would fit with the 'whole farm' approach advocated by the council, and may reduce the costs and risks of achieving planning permission in the long run.	Noted. Changes are proposed.
Paragraph 2.10		
S & A Group - Grower	S&A Group disagree that the application for Polytunnels should come in advance of applications for associated developments, on the basis that this will provide insufficient certainty for the business. For this reason it would be more appropriate to submit concurrent planning applications that deals with all the different elements on each site.	The SPD is requesting that applications include associated development so that the full extent of the development can be considered.
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	Agreed and 'various developments' should be specified as part of the planning process.	Acknowledged. Change proposed.

Mr A Fraser - Marden Resident	This paragraph conflicts with paragraph 2.9 and section 5. As written it implies acceptance on a drip feed basis, perhaps over many years, of additional requirements for a given farm. And that will result in an enormous operational complex out of all proportion to the local community. The farmer will continue to ask for additions to meet his requirements. I suggest that unless all the associated applications are submitted no future, associated applications will be accepted.	Acknowledged. Changes are proposed.
Paragraph 2.11		
Mr A Fraser - Marden Resident	As the preceding paragraphs refer to additional buildings it would be helpful if references to building design policy were included.	Noted. Any associated buildings will be required to be of good design and is guided by other Plan policies.
Paragraph 2.12		
Aubrey Green - Arrow Valley Residents Association	What does "unless material considerations indicate otherwise" mean?	This phrase indicates that normal planning policy will be applied unless there are other justifiable reasons/ instances which should override .
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	'Material considerations' is a phrase often used by planners; it was usefully clarified in an addendum to the record of the Consultation Meeting held on 10.09./07 : ...'there is no statutory definition of this phrase and its interpretation has been left to the Courts. As a guide any consideration that relates to the use and development of land is capable of being a planning consideration' (see App.4 - 2 of the Draft Polytunnels SPD Statement of Consultation accompanying this document)	Noted.
Duncan McCallum - DPDS Region	It would be helpful to applicants to note more specifically that policy not mentioned may also be relevant to any particular application.	Acknowledged. Change proposed.
	The principles of rural economic development and policy set out in Planning Policy Statement 7. Planning Policy Statement 7- Sustainable Development in Rural Areas was reviewed by Government in 2004. It firmly recognizes the important and varied roles of agriculture and its important place in the management and economy of rural areas. PPS7 espouses to a multi-functional, diverse rural economy with profitable land management at its centre should not be ignored. PPS7 made no changes to the issue of temporary structures used for agricultural purposes.	Noted.

Donna Tavernor - CLA West Midlands	The SPD makes reference to PPS7, but the document makes no mention at all to PPS1 Delivering Sustainable Development and the need for a balanced approach to be taken to sustainable development. Nor does it make reference to the PPS1 Supplement Planning and Climate Change and in particular to paragraph 25 regarding the accessibility of rural sites. National planning policy is there for a reason, and needs to be included in the SPD.	Acknowledged. Change proposed.
	The CLA view is that the policies and policy context within the document to be, generally, worded in a negative manner. Government has been at pains to ensure that national planning policy statements are worded in a positive statement in the hope that this “positive policy” message filters down to local policies. The PPS on Planning and Climate change and Draft PPS4 Planning for Sustainable Economic Development are worded in a positive manner. Draft PPS4 positively promotes economic development in rural areas. CLA would asks that the SPD is amended to produce a more positive attitude towards the use of polytunnels.	The issues identified in para. 2.13 summarise the policy requirements. There has been no attempt to word them in a negative fashion. Every attempt has been made throughout this SPD to maintain a justifiable and balanced interpretation of policy requirements.
	Herefordshire is predominately rural so it is important that agricultural and farm diversification are promoted. The Regional Spatial Strategy also states under policy PA15 that this included new innovative crops, on farm processing and local marketing.	Noted. Whilst the SPD acknowledges the need for farm diversification this policy objective needs to be included. Change proposed.
Hayley Pankhurst - Natural England	Polytunnels are perhaps unusual in that they directly link agricultural practices with the planning system. As the involvement of growers with the planning system, and indeed the involvement of the planning system in agricultural matters may otherwise be minimal there would be some value in recognising within the draft SPD the minimum standards to which growers should already be adhering. Whilst it is recognised that these matters are outside of the remit of the planning system, clarifying these regulatory standards would aid Development Control Officers unfamiliar with agricultural regulations and help to avoid having to negotiate a planning condition for matters dealt with under Defra regulations.	Agreed. Change proposed.
Paragraph 2.13		
B G Mann - Marden Resident	Flooding has increased in the village, outstanding beauty has gone.	Noted.
Pyons Group Parish Council	It would appear that with all policies listed under the Planning Policy Context that all contingencies are catered for – so long as all Polytunnels require planning permission. However it begs the question why these policies have been ignored in recent years.	Noted.

Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	Policy DR13 - The noise generated by the industrial scale and nature of the polytunnel developments is, dramatically underestimated by planners and councillors. 'Quiet enjoyment and tranquillity' are human rights but increasingly difficult to find in some rural areas. Herefordshire Council should be prepared to address the noise issue through this policy.	Noise is an issue that is to be addressed. UDP policy DR13 and guideline 13 of the SPD make this clear. Noted.
Frank Hemming - Resident	Key UDP Policy S2 - The use of artificial nitrate fertilizer is not sustainable as it is dependent on diminishing supplies of natural gas through the Haber Bosch process. Its use also inhibits the activity of soil microbial associations and thus the uptake of minerals, necessitating the use of phosphate fertilizer. Phosphate is a diminishing resource. Nitrate and phosphate are both becoming increasingly expensive. Organic cultivation would appear to be an answer to this problem, but not if sources of fertility such as manure are themselves dependent on the use of these fertilizers.	Noted. However the use of fertilisers other than in the context of pollution is not a planning matter.
	Key UDP Policy S4 - If the development is dependent on supermarkets this helps undermine the local economy by removing wealth from the county to shareholders.	Noted.
	Key UDP Policy S6 - Transport of goods to supermarket regional distribution centres and then to supermarkets involves more transport cost and pollution than local distribution. (Tim Lang and Jules Pretty) Also use of energy DR1 and DR4.	Noted.
Chris Lambert - The National Trust	We welcome the table summarising the UDP policies and are particularly pleased to note the references to protecting the settings of the historic parks and gardens and listed buildings. The settings of archaeological sites are protected in UDP Policies ARCH3 and ARCH4 but this is not mentioned in the draft SPD. Suggested change - Add reference to the settings elements of UDP policies ARCH3 and ARCH4.	UDP archaeological policies 1-6 are referred in the SPD table and also at para. 4.60. Whilst no further change is felt necessary to the table it should be noted that a change is proposed to include a further guideline on archaeology.
Mr A Fraser - Marden Resident	Suggest Key UDP Policy (KUP) S6 should be included under Supplementary Guideline (SG) 10. Suggest KUPs DR4 and DR6 are included under a new SG19a water resources. Believe KUP DR13 should be referred to SG13. Consider KUPs LA5 and LA6 should be included in SG4 and SG5.	Agreed. Changes proposed.

Hayley Pankhurst - Natural England	In order to receive their Single Farm Payment growers must meet Defra's Cross Compliance requirements for Good Agricultural and Environmental Conditions (GAECs) and Statutory Management Requirements (SMRs). Relevant GAECs are likely to be GAEC 1 'Soil Protection Review', GAEC 3 'Waterlogged soil', GAEC 8 'Public rights of way' GAEC 13 'Stone walls' GAEC 14 'Protection of hedgerows and watercourses' and GAEC 15 'Hedgerows'. Relevant Statutory Management Requirements (SMRs) are likely to be SMR 1 'wild birds', SMR 2 'groundwater', SMR 4 'Nitrate Vulnerable Zones' and SMR 5 'habitats and species'. Further information can be found at: http://www.defra.gov.uk/farm/singlepay/furtherinfo/crosscomply/index.htm	Noted.
Paragraph 3.1		
B G Mann - Marden Resident	All of these points affect us.	Noted.
Aubrey Green - Arrow Valley Residents Association	Landscape & Visual Amenity. Add long-distant visibility of polytunnels located on slopes or capable of being viewed from high ground as an issue.	Noted. Reference to long distance views proposed to be added.
	Residential Amenity. Add 'smell of fruit' as an issue. Add 'water run-off' as an issue. Add 'increase in rodents and vermin' as an issue as they eat left over / decaying soft fruit in the tunnels. An issue also not raised is the permanence of the proposed polytunnel development. Is it equitable a farmer erects polytunnels near a residence for ten years? In such circumstances the buffer zone should increase from 30 metres to 50 metres.	Noted. Changes are proposed to address pollution and general nuisance as set out in the UDP policy DR4. Water run-off is an issue already identified. Permanence and temporary permissions are addressed in Section 6. The guideline relating to distance from residential property should not be determined by time related permission.
	Water - A bund or ditch of reasonable capacity must be provided to prevent run-off onto roads, footpaths, other owners' land must be provided at the downhill edge of relevant fields. See also 4.53	Section 3 summaries the planning issues. It is not appropriate to include details of run-off prevention in this list.
	Economic needs must evaluate and QUANTIFY effect on impact on tourism.	Noted.
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	Landscape and Visual Impacts - The prominence of polytunnels in the areas listed within the landscape must be the critical consideration.	Noted.
	Residential - The first sentence should be changed to 'Those living close to polytunnels will be adversely affected.' The Council should add 'spray drift' and 'reduction in property values' to their list of impacts.	Noted. Changes are proposed to include pollution and general nuisance as issues.

C/RE	Archaeology - Surveillance and pre-emptive planning restrictions must be enforced when large-scale polytunnels developments, particularly with associated reservoir construction, roads and hard-standings, are planned.	Noted. These are possible requirements to be considered.
Mr A Fraser - Marden Resident	Residential: you should include the following adverse implications experienced in villages such as this e.g. urinating in public, illegal camping, stealing, prostitution, vibration felt in property due to the running of generators, litter as well as the few items you have identified. Transport: you need to add 13/14 century bridges, the ruining of local road surfaces, left hand drive articulated lorries without adequate rear view mirrors, farm owned buses running in convoy. There is nothing here on wildlife and that requires a brief addition, as it is very important.	Noted. Changes are proposed to include general nuisance. Effects on wildlife also proposals to be added.
Nick Evans - Uni of Worcs and CRC	The planning issues listed here are NOT in the same order as they appear subsequently in the document, nor to they have identical titles to those in the remainder of the document (E.g. 'Public Rights of Way' are listed here but are entitled 'Highway Issues' later on). Consistency is essential. 'Economic Needs and Impacts': there is no mention of fundamental aspects of the rural economy, such as those relating to the survival of family farm businesses or to established rural residents (such as issues relating to house prices). 'Landscape and Visual Impacts': clarification is needed that and AONB is a protected area. 'Residential Amenity': notwithstanding that this is a poor term and that one relating to 'quality of life' would be better, there seems to be no priority to the importance of the factors listed. For example, our research shows that noise is the number one concern of residents. The discussion from 4.38 should reflect the priorities assigned to them by residents. 'Archaeology': there is no indication that the 'impact' referred to is a negative rather than positive one.	Agreed. Changed to order proposed. In respect of the issues identified there are only brief summaries and do not go into any detail.
Hayley Pankhurst - Natural England	Landscape and Visual Impacts - The wording of this section should be altered to reflect that it is not just developments within AONBs that require important consideration, but also those that affect views into or from the AONB. This is particularly relevant to upland areas such as the Malvern Hills or river valleys such as the Wye Valley where views are likely to be far reaching.	Noted and wording changed.
Paragraph 4.2		

S A Group - Grower	The overriding principle is that considerable weight should be afforded to economic considerations, in the balancing of material planning issues, especially as against landscape impact. Nevertheless, we are concerned that there appears to be discord between the principle itself as stated in para 4.2 and the supporting text that follows. We believe that amendments need to be made to the supporting text so that it accurately reflects this principle.	Noted. The supporting text 4.3 - 4.11 identifies the benefits that may accrue from any one development. It is considered that this fairly assesses those benefits. No change is necessary.
Mr N J Cockburn - Grower	It is said in this para that economic benefits must be balanced against landscape impact, but guideline 2 states that priority will always be given to landscape in AONBs, this is a key contradiction which needs to be corrected in the document.	Whilst in general terms economic benefits need to be balanced against landscape impact in AONB's priority needs to be afforded to the landscape. This reflects UDP and national policy.
Nick Evans - Uni of Worcs and CRC	There are frequently more than 'two' key issues, particularly when social factors are taken into account.	Agreed. There are often more than the two key issues.
Paragraph 4.3		
Pyons Group Parish Council	Economic benefit is almost entirely to the farmer; there is little local spin off – no employment and financially the benefits disappear abroad.	There often are economic benefits to the local community. However these need to be assessed on a case by case basis.
S A Group - Grower	The S&A Group welcomes the recognition given in the SPD consultation document of the importance of the economic benefits of erecting polytunnels.	Noted.
	Recent appeal decisions of the Planning Inspectorate have confirmed and identified the wide scope of such economic benefits.	Noted.
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	"Economic benefit" ought to be preceded by 'enormous' to properly describe how critical polytunnels are to soft fruit production.	It is not felt necessary to assess the degree of any benefit.
	The soft fruit farms of Herefordshire would not be viable without the use of polytunnels in the UK climate. Their contribution to the local rural economy must be given full consideration when determining a planning application.	Noted.

Mr N J Cockburn - Grower	The economic benefit to the wider local and national economy is without doubt and is not in dispute, the word potentially should be removed.	Noted. The word potentially makes clear the economic benefits that could be accrued to the wider community. It should not be removed as this would imply that every scheme would have automatic local economic benefits and this may not always be so.
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	This section makes many assertions about economic benefits which are not qualified by research and appropriate date, for example, Clause 4.10 on seasonal workers, food miles and pesticide usage and 4.12 on the effect on tourism. These issues have been addressed at the relevant place but the Council's attention should be drawn to a more general point on economic arguments. There should be clear and robust evidence to justify any economic claims. Economic justifications rely heavily on predictive data for future prices. The agricultural and horticultural sectors are heavy users of oil and its by-products: plastics, pesticides. Recent evidence suggests major projects are being justified on an unrealistic future oil price. The well-respected Stockholm Environment Institute (SEI) is critical that a government consultation on the economic case for expanding Heathrow Airport 'forecasts that oil will cost \$53 a barrel in 2030.' The SEI says the government is 'strangely out of step with common predictions for oil prices', going against a futures market that predicts a price of \$140 a barrel in 2016 (July 23, 2008). Herefordshire Council should not only re-examine their future oil price predictions but also those of the growers in this highly energy-intensive polytunnel industry.	This section identifies the economic benefits that could be accrued. It is for each applicant to set out what the benefits may be from each proposed.
Donna Tavernor - CLA West Midlands	<p>The importance of a thriving rural economy, which includes the use of polytunnels as a profitable production method, to maintaining areas of high landscape value including Areas of Outstanding Natural Beauty must be recognised and land managers should not have their businesses unfairly restricted because they farm in such locations.</p> <p>Over-regulation of polytunnels in designated areas is likely to put profitable and efficient producers out of business with consequential knock-on effects on the rural economy. Ultimately imports of soft fruit and vegetables could rise with associated problems of increasing food miles and increased CO2 emissions thus affecting the UK's GHG emission levels.</p>	<p>However, national and UDP policy places priority to the landscape.</p> <p>Noted. The SPD sets out the issues that may need to be considered on any one application. This confirms a balanced approach to be taken.</p>

	Polytunnels are often sighted as being detrimental to other business in an area e.g. tourism however the CLA is unaware of any evidence that polytunnels in National Parks or Areas of Outstanding Natural Beauty have an impact on tourism levels and margins in these areas. We would ask that Herefordshire consider this point carefully as we believe that a stance against polytunnels purely based on unsubstantiated facts and figures is unfair to producers.	Noted. The SPD makes clear that there is no current evidence of the effects of polytunnel developments upon tourism.
Nick Evans - Uni of Worcs and CRC	The economic benefit referred to could be couched more specifically as a growing consumer market in the face of health campaigns, such as 'five-a-day'. This was consistently mentioned by growers in our research.	Noted.
Hayley Pankhurst - Natural England	Economic benefit - The 'Economic Need and Impact' section of 'Section 4: Detailed Assessment of Planning Issues' sets out economic benefit as a "fundamental argument in favour of polytunnels" (4.3). In establishing this argument the section presents evidence from PPS, the RSS and case law. This detailed establishment of policy context is less apparent in the corresponding sections on Landscape Impacts, Water and Biodiversity. It is important that the draft SPD does not unintentionally prejudice development control decisions through a difference in detail and tone from section to section.	Noted. The economic case is clearly one which can be made to show the benefits of a development. The SPD also sets out the other issues where negative impacts can result and where they need to be assessed. The SPD has attempted to set out the possible negatives so that a balanced consideration can be taken to each proposal.
Paragraph 4.4		
Nick Evans - Uni of Worcs and CRC	The statement that tourism in Herefordshire is inherited from pre-industrial times is highly questionable. Evidence is needed if this assertion is to remain in the document.	The statement refers to the economic base of Herefordshire and is not just stating that tourism in Herefordshire is inherited from pre-industrial times.
Paragraph 4.5		
Nick Evans - Uni of Worcs and CRC	'midlands' should be 'Midlands'.	Correction.
Paragraph 4.6		

Nick Evans - Uni of Worcs and CRC	Mentions the 'rural economy', which ideally should be the heading for this section.	Agreed whilst much of this sub-section sets the context of the rural economy, the main purpose of this section is to assist applicants in setting out the various economic benefits that could accrue and that are supported by planning policy. No change.
Paragraph 4.7		
S A Group - Grower	Accordingly, the S& A group respectfully suggest that the SPD explicitly adopts and endorses the approach in Pennoxstone court et al, making it clear that the economic benefits associated with polytunnel use will be afforded considerable weight in decision process.	All of the information provided with a planning application will help judgement. Para 4.7 makes clear that the economic argument is of particular importance. The weight to be attached to any one proposal will be on their merits. It would be wrong to imply that in AONB's the economic case is afforded more weight than landscape designation.
Mr N J Cockburn - Grower	Where tunnels are sited in AONBs, it is only necessary under current planning law to show benefit generally, and not specifically to the local community, although such benefit does occur. This paragraph should be removed.	UDP Plan Policy LA1 (which reflects national policy) states that development in AONB's will only be permitted when it is small scale, does not adversely affect the intrinsic natural beauty of the landscape and is necessary to facilitate the economic and social well-being of the designated area and their communities. No change.
	The section on AONB landscapes would appear to make it impossible for any growers to use tunnels in an AONB. This is a direct contradiction to announcements made at an enforcement appeal where it was said that there could be tunnels in an AONB and that the present level of usage was acceptable.	The SPD states the UDP policies which refer to AONB's. It also mentions that small scale development can occur and that there will need to be a balance between economic and landscape issues.

Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	The Council's UDP policy LA1 requires far more than an economic argument for approval. It requires all its sub-clauses to be satisfied.	Agreed. The economic case is only one issue for consideration.
Mr A Fraser - Marden Resident	Whilst AONBs are important so are local communities. This paragraph should be changed to reflect the fact that clear evidence must be shown for any area in Hereford as all the countryside should be given the same level of consideration. I suggest a merging of paragraphs 4.7 and 4.8.	Agreed.
Hayley Pankhurst - Natural England	Economic Need and Impact - Paragraph 4.7 states that "the economic argument is of particular importance when polytunnel developments are proposed in AONBs". While there is a need to provide increased justification for polytunnels in AONBs, it should not be a matter of weighing up the economic advantages against the landscape protection afforded by the AONB designation. LPAs have a duty of care for AONBs under the Countryside and Rights of Way Act 2000, and this is not secondary to the requirement to promote economic growth (see also section 4.17). Unlike National Parks the requirement to provide economic activity is not a primary responsibility of AONBs. Only in cases of "exceptional national need" should the requirements to protect the landscape be secondary.	Within the Pennoxstone appeal, the Inspector stated that economic should be balanced by landscape.
Paragraph 4.9		
Aubrey Green - Arrow Valley Residents Association	This information has been supplied by the soft fruit industry and shows no sign of independent scrutiny. It should be edited by an independent assessor or removed.	The SPD has referenced the source of the information provided in this subsection. It is provided to give some factual background. It is not apparent that this information is inaccurate. In respect of commercial benefits it helps set out the information that applicants should consider providing.
	UK agriculture is not in decline – world-wide demand for most products is increasing dramatically with the rise in living standards world-wide. Grain prices etc. have increased dramatically over past 24 months.	Agreed. Change proposed.
	Bullet point 1 - The Council should be reminded that the phrase 'today's customers' refers not to shoppers but to the supermarket buyers who demand cosmetic perfection.	Noted.

Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	Bullet points 3 & 4 - UK polytunnels do not enable a 'continuous and reliable supply'. Late May to November is just about the longest season they can manage. Year round 'perpetual summertime' comes courtesy of Spain, North Africa, Israel and small amounts from USA. All these imports are arranged through supermarket 'category managers' who are often the large UK growers themselves. Far from being noble patriots, then, they encourage and promote imported fruit. For example, Berryworld (see www.berryworld.co.uk accessed 17 July 2008) states: '[it] accounts for approximately 20 per cent of soft fruit supplies to UK multiple retailers. The company currently represents growers covering more than 2,500 acres of soft fruit production in the UK and other countries in Europe, North and South America, the Middle East and South Africa. Global sourcing ensures year round supply, and enables us to offer the widest selection of berries and currants.'	Noted. Change proposed.
Duncan McCallum - DPDS Region	It is inappropriate in SPD to refer to lobbying bodies and their websites and as a result the whole section on economic benefits and landscape it unbalanced.	See above.
Frank Hemming - Resident	Demand for High Quality Produce. From personal experience I have yet to taste a supermarket and presumably polytunnel grown strawberry that tastes as good as a garden grown or truly locally grown strawberry.	Noted
Mr A Fraser - Marden Resident	This paragraph represents the grower's view of the need for polytunnels. Whilst I can appreciate the views of growers I believe that these statements should not form a part of the planning justification.	This paragraph provides examples of the commercial information a grower may consider providing to help inform of the economic benefits that could accrue.
Donna Tavernor - CLA West Midlands	CLA agree that the fundamental argument in favour of polytunnels is the economic benefit to the farmers and the wider rural economy and national economy.	Noted.
Nick Evans - Uni of Worcs and CRC	Is largely derived from a potentially highly biased source, so that a clear caveat should be issued to the reader that this is the case. For example, the statement about 'going out of business' in the second paragraph might realistically be an overstatement – going out of a specific soft fruit enterprise would seem to be more accurate. There is no mention of food miles here.	The factual information has been referenced and is provided as informative and as some background. Reference growers going out of business is proposed for deletion.
Hayley Pankhurst - Natural England	Read as a 'coaching manual' for applicants as to what to put into their planning application. This unbalances the document and seems inappropriate.	Noted.
Paragraph 4.10		

Leintwardine Group Parish Council	Migrant workers will strain local facilities such as schools, doctors and possible social security offices. This should be avoided otherwise any financial benefit to the community will be lost. Therefore, local jobs first especially the unemployed and then migrant workers.	Noted.
	Health. Compare conditions in Spain where there is a high migrant workforce, the suicide rate is high, is this due to adverse working conditions or migrant loneliness?	Noted.
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	Reduction in food miles. Soft fruit continues to be imported therefore there is still scope to increase the soft fruit supply in the UK.	Noted.
Aubrey Green - Arrow Valley Residents Association	Impact on Local Services. (1) Local bus services are now over-crowded and the provider has made no attempt to increase seat numbers. If seasonal workers board at a stop before local residents, elderly community members often have to stand. (2) If workers are housed away from local communities on isolated farms, communities suffer few direct benefits. Seasonal workers shop in supermarkets where profits are repatriated out of the locality.	Noted. The paragraph is proposed for change to be more general.
	Reduction in Food Miles. Supplementary Guideline 1. Paragraph should be deleted unless evidence can be produced showing the environmental benefits flowing from the reduction in food imports is greater than the environmental negatives involved in importing seasonal workers, growing crops out of season in UK under plastic etc. AVRA hold no research has been conducted into the externalities in this area.	This bullet point is proposed for change. It is necessary for some consideration to be given to whatever small contribution to reducing food miles. This needs to be considered against other environmental issues as raised.
	'There may be economic benefits to the economy of the wider rural community'. On the other hand there may not. Consider the cost of repairs and maintenance to local roads and infrastructure by increased use of heavy lorries, the effects of severe water run-off on roads and water courses, the possible down-turn of tourism in polytunnel areas to say nothing of the largely unquantifiable effect of the developments on residents' physical and mental wellbeing. Have these disadvantages ever been properly researched and balanced against the also largely unresearched advantages to the communities who bear the brunt of the developments?	Bullet points 1 and 2 as proposed for change set out in general terms the economic benefits of migrant workers and some negative impacts. There is no local research information and so these can only be general statements. The impacts on roads by heavy traffic etc and environmental issues are set out elsewhere.

<p>Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE</p>	<p>Bullet point 1 - There is only anecdotal evidence of how seasonal workers contribute to the local economy. The Government's £15m fund to mitigate the extra burden on public services due to migrants is described by the Commons communities and local government select committee as 'a drop in the ocean' (Guardian, p11 Wed July 16, 2008). Observation and experience indicate that the migrants' basic shopping is carried out at national supermarkets that recirculate a paltry amount of their takings locally, compared with local shops.</p>	<p>Evidence of local spend is not available and the points raised here are acknowledged. There will however be some local spend in local communities which is all the bullet point is saying. No change.</p>
	<p>Reduction in food miles - Substituting local fruit for imported fruit has had no effect on reducing overall trends in food transport which is upwards. The following statistics are quoted from a Defra report: 'The Validity of Food Miles as an Indicator of Sustainable Development', published July 2005. 'Food miles increased by 15% in the 10 years to 2002. The average distance we now drive to shop for food each year is 898 miles, compared with 747 miles a decade ago. Food transport accounts for 25% of all the miles driven by heavy goods vehicles on our roads. The use of HGVs to transport food has doubled since 1974. Transport of food by air has the highest CO2 emissions per ton and is the fastest growing mode.' The last 10 years has seen an enormous increase in the international transportation of fruit by air and road. This is mainly because we eat more fruit and more exotic fruit. The comments above, under Clause 4.9, bullet points 3 & 4, are relevant with regard to the way the UK soft-fruit industry is also responsible for increasing imports. As for California, it has never</p>	<p>See above.</p>
	<p>been a big supplier of soft fruit to UK. In 2007, information was conveyed, by a major Herefordshire grower, to the effect that California's total strawberry export to UK was equivalent to about 50 acres of his Herefordshire production. As far as national economic benefits go, the same July 2005 DEFRA report also attempts to put a cost on the social and environmental impacts of food miles. Taking into account the time lost to traffic congestion, wear on the roads, ill health caused by air and noise pollution and accidents caused by food transport, its authors suggest the cost of food miles is £9bn a year to the UK. This is greater than the total contribution of the agricultural sector to GDP (£6.4bn) and half the total value of the food and drink manufacturing sector (£19.8bn).</p>	
	<p>CPRE specific comment - I accept the contribution that seasonal workers may add to the economy but warn against reliance on this. There is evidence that this source of labour is drying up as the A8 countries develop their own economies. Local services therefore may themselves suffer if they become reliant on a temporary input.</p>	<p>The contribution to the local economy is just one of the factors to be considered.</p>

Frank Hemming - Resident	<p>Employment and the rural economy. If seasonal workers send money abroad how does this contribute to the local economy?</p> <p>Reduction in Food Miles. Fruit air freighted from California would soon become too expensive to be viable as costs of aviation fuel rise, even without the competition from fruit grown in the UK. In the end, whether soon, or “over generations” the present supermarket system of distribution will cease to be viable economically as transport fuel costs rise. It is already unsustainable.</p>	<p>Acknowledged. The degree of local spend is not known.</p> <p>See above.</p>
Mr A Fraser - Marden Resident	<p>I believe the wider benefits are, sadly, misplaced. The majority of labour used is temporary foreign labour and, as a consequence, has little effect on the UK indigenous labour market. That is, except for the fact that if EU citizens have been employed and are subsequently refused further work they are entitled to remain in the UK and become a legitimate burden on the Local Authority and Government handouts. Although those working obviously spend some money in the UK the prime intention of the majority is to send the money back home for families or for support whilst undergoing university courses. If you insist on keeping the majority of this bullet point then you must change it to reflect this comment. The second bullet has confused temporary workers with those that have come for longer periods of time. It is not a moot point that foreigners are putting services under strain, why else would the hospital ask villagers about the numbers of overseas workers employed in the local area if it was not concerned about the numbers. Schools already have problems with multi</p> <p>ethnicity and additional foreigners exacerbate the situation. This statement must be amended to reflect the real world. The third bullet point concerning pesticide fails to reflect the practical situation. It is simply not true that fewer pesticides have to be purchased; the same pesticides are still in use. What may be true is that, with polytunnels, there is not the need for the same quantities of those pesticides. That is a very different situation from that given. There is still very real concern about chemicals leaching into the ground and back to the water sources as well as the potential for chemically induced soft fruit to have harmful effects on humans when the fruit is eaten. These views must be presented if this paper is to represent a fair statement of the situation. The fourth bullet point, the reduction in food miles; although Californian fruit might not be coming into the UK today there is no legal reason why it should not be imported if there were unforeseen growing problems in the UK. Fruit already comes in from the continent and these other sources permit the</p>	<p>Acknowledged. Change proposed.</p>

	growers to artificially extend their fruit production seasons by packaging the foreign imports (and increase profits) so it is disingenuous to make the statement about imports. Consequently that aspect should be deleted; it may be better to say that foreign imports are expected reduce and not feature one particular source.	
Nick Evans - Uni of Worcs and CRC	Overall, the points in this section are insufficiently nuanced. 'Employment and the Rural Economy': pickers can earn higher wages not only by virtue of a longer season, but by the picking of a higher proportion of class 1 fruit. 'Impact on local services': The statement that 'local inhabitants have objected' sounds as though it speaks for everyone. This is not the case. What does 'a moot point' mean? Further on, there is a point about local bus services, yet most producers run their own transport. 'Pesticide usage': the figure of a 50% reduction is one perpetuated in the popular media. Our research demonstrates that, from speaking to experts in the field, a 30% reduction is more accurate. Of course, and relating to information contained in Para 1.7, pesticide usage is far greater vis a vis arable production. 'Reduction in Food Miles': can it be categorically stated that 'imports have been eliminated' from California? To my knowledge, these continue in modest quantities at specific times.	Noted. See changes proposed.
Hayley Pankhurst - Natural England	It should be noted in 4(b) that AONB's are the primary landscape designation over an above local designations for Landscape.	Noted.
Paragraph 4.11		
Leintwardine Group Parish Council	There should be economic benefit for all not just farmers although they need all the help and support possible.	Noted.
	Job creation is important in this deprived part of the UK.	Noted.
	The range of food grown should be much greater than just soft fruit. With increasing food prices, this range is critical and many year round veg could be grown with very low food miles.	Noted.
Douglas Gardner - Marden Resident	The economic benefits mention in para 4.11 regarding the Inspectors comments at the kings Caple appeal decision, but it fails to mention that the Inspector decided that those benefits were outweighed by the serious harm caused by the polytunnels to the natural beauty of the AONB and should be amended to do so.	Paragraph 4.11 refers to the economic weight given by the Council and Inquiry Inspector at Pennoxstone Court. It does not however refer to the other issues that were also considered. It is therefore proposed for deletion.

Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	The Inspector also said of the most sensitive areas in landscape terms: '.....Mitigation planting would not overcome the harm to the landscape. I consider that the polytunnels in those fields conflict with the protection accorded to AONBs in national policies and with UDP LA1. I conclude that those polytunnels cause serious harm to the natural beauty of the landscape and the countryside of the Wye Valley AONB and that this harm is not outweighed by the acknowledged benefits.' The Council's choice of the Pennoxstone Court Inquiry Inspector's words and this choice are both selective. Such selections should not be used out of context with their origins to form part of a policy document.	Sentence added to explain that landscape was also an issue.?
Hayley Pankhurst - Natural England	makes reference to the Kings Caple case in terms of the Inspectors comments on economic impact, but curiously does not mention the unmitigated landscape impacts which resulted in enforcement action being taken. As discussed in our previous comments, case law is not given the same weighting in the landscape, water or biodiversity sections of the SPD. This unbalances the document by implying a weighting in favour of the economic considerations.	Noted.
Paragraph 4.12		
Ross & District Civic Society	The comment on the visual impacts of polytunnels should read that they "could well prove detrimental" (or "are likely to be detrimental") to tourism & leisure interests.	Noted. Wording has changed to reflect the comments.
Pyons Group Parish Council	The fact that statistics are not available to prove the adverse impact of Polytunnels on tourism is no justification for ignoring the potential harm. If tourism is important and attracted by Herefordshire's countryside, it is obvious that swathes of tunnels, particularly in AONBs, must have a negative effect.	Noted. The paragraph indicates that polytunnels and their visual impact could prove detrimental to tourists and other leisure visits to Herefordshire's countryside. However little evidence is available.
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	The SPD should not lose sight of the fact that farmers and growers are responsible for managing landscapes that attract tourism and other leisure visits to the countryside. Unless these growers can sustain viable businesses this management role is compromised.	Noted.
Mr N J Cockburn - Grower	There is no evidence of any detriment to tourism from tunnels and any reference to such should be deleted.	Paragraph 4.12 should remain as a statement to recognise that there is currently little evidence that can be used for or against any proposal.

Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	The Council's comments are noted concerning lack of statistical evidence on the effects of polytunnels on tourism. Personal experience, in talking to tourist providers, is that the presence of polytunnels highly influences tourists' return visits and choices of trips. The Council should consider commissioning research into the effect of polytunnels on tourism particularly in and around the polytunnel hot spots. The Council should apply these comments to many of the assertions on issues of sustainability, food miles and general economic theory in Section 4.	Noted.
Mr A Fraser - Marden Resident	I believe you should include in this paragraph the statement that house sales have been blighted by the proliferation of polytunnels.	This is not an issue around tourism.
Martin Field Clerk Bodenham Parish Council	In the light of the critical importance of tourism to the Herefordshire economy research should be undertaken as a matter of urgency as planning applications cannot be properly assessed without this evidence.	Noted.
Nick Evans - Uni of Worcs and CRC	Refers to an unproven assertion rather than anything that can be ascertained through factual evidence. Repeated in Para 4.37.	Noted.
<i>Supplementary Guideline 1</i>		
Duncan McCallum - DPDS Region	In determining the weight that the Council will give to material considerations, this is a policy and an explanation of how Council policy will be applied. It should be in a LDD document, subject to independent scrutiny, not in SPD. It should be omitted.	This guideline makes clear that the economic benefits of a proposal should be afforded considerable weight. This does not need to reply upon an LDD document. Such a guideline follows current government advice for all proposals to be considered on others merits and reflects Inspectors views at appeal decisions. No change.
Mr A Fraser - Marden Resident	I suggest should be modified to require growers to show that they will reduce reliance on imported fruit.	
Paragraph 4.13		

Douglas Gardner - Marden Resident	<p>To readdress the present imbalance in the draft SPD the section headed 'Landscape & Visual Impacts' in sections 4.13 – 4.22 should be extended to include the following points raised by the Council's barrister, Mr Richard Kimblin, in his closing statement to the Kings Cople Inquiry, namely: "1 / Policy LA1 provides that developments in an AONB, in addition to not adversely affecting the intrinsic natural beauty of the landscape, must be of 'small scale'. It is not tenable to describe a built development of the size of a block of agricultural polytunnels over several hectares as 'small sale'. 2/ The Council has a duty of care to protect and enhance the landscape of the AONB and damage to such an interest is not excused by economic advantage. Where agriculture damages this landscape there can be no support for such development at all. 3/ Exceptions to Policy LA1 will only be permitted where the development is of greater national interest than the purpose of the AONB."</p>	These paragraphs which relate to an appeal decision are contained in the policy context and elsewhere. It is not necessary to repeat them here.
Aubrey Green - Arrow Valley Residents Association	<p>Such development cannot comply with the requirements of Policy LA1, the suggestion that it is 'not feasible' to exclude such developments from AONBs should therefore be deleted from the SPD. It is not feasible to allow them.</p>	Agreed. Change proposed.
Donna Tavernor - CLA West Midlands	<p>"...the visual impact of polytunnels is invariably the most...". This is incorrect. Each case is individual. In some instances environmental, traffic or social issues may be primary.</p>	This is why the Council encourage the whole team approach which is detailed in Section 6.
	<p>The CLA believes that it is important that growers demonstrate commitment to sound soil and water management principles. Often this can be achieved by temporary polytunnels being rotated around an agricultural holding in order to reduce the impacts on landscape, soil and water. However where polytunnels are temporary in nature it is difficult to undertake landscaping to reduce the visibility unless it is part of an overall plan of landscaping to include for increased hedge heights and sympathetic planting.</p>	Agreed. Hence the need for landscape assessments to be provided (5.7)
	<p>Landscapes do need to be assessed as different landscapes have potential to tolerate polytunnels; also the landscape is evolving with modern agricultural practices. Growers should be encouraged into having a whole farm approach when planning polytunnels locations, so that the public can understand the rotation and know when the tunnels will move, as there are not permit structure.</p>	

Hayley Pankhurst - Natural England	Landscape Impacts - The 'Landscape and Visual Impacts' section of 'Section 4: Detailed Assessment of Planning Issues' should be strengthened to give greater and more appropriate weight to landscape impacts, particularly in relation to Area of Outstanding Natural Beauty (AONB). Natural England recommend that a succinct summary of relevant national, regional and local policy and case law be included early on in the 'Landscape and Visual Impacts' section. Case law has established the value of Herefordshire's landscape as a whole, as has the adopted UDP and Landscape Character Assessment SPG. PPS7 confirms the special value of AONBs. While it is noted that this weight is given in the guidelines (Supplementary Guideline 2), setting out the policy context earlier in the section would establish a stronger tone from the outset. In addition, as the purpose of this draft SPD is to inform applicants and interested parties (1.1) an understanding of the planning policy context cannot be assumed.	Agreed change proposed to add sentence to para 4.17 to highlight the national policy stance of PPS7 to reflect these comments.
Paragraph 4.14		
Nick Evans - Uni of Worcs and CRC	Correct grammar – 'to fully address'. Repeated para 5.7. Also 5.10 'to simply include'.	Correction.
Paragraph 4.16		
Aubrey Green - Arrow Valley Residents Association	More detail is needed so parties can assess whether a particular development will "overwhelm and destroy the inherent character of the landscape". What criteria will be used? Will they be qualitative and/or quantitative?	Most applications will require a landscape assessment (paras 5.7 - 5.9). Assessments will be guided by guidelines for landscape and visual impact assessment as set out in para 5.9.
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	No large industrial-scale polytunnel site in Herefordshire, Gloucestershire, Surrey or Spanish Almeria can exist without undue harm being done to the landscape.	Noted.
Martin Field Clerk Bodenham Parish Council	Undue harm is too subjective a term and should be more closely defined for the guidance applicants and persons wishing to make representations.	Paragraph 5.9 refers to the Landscape Institute of Environment Management and Assessment as being the most definitive work providing guidelines to access landscape and visual effects.
Paragraph 4.17		

Ross & District Civic Society	These paragraphs need to be 'beefed up' to emphasise that the Council will adopt a robust line towards applications in AONB's. It should be made clear that it will be the exception rather than the rule to allow further expansion either by an existing grower or newcomer. It ought also to be made clear that this rigorous approach will be applied to polytunnels already erected, and in particular to any dating from, say, mid-2006 when the Tuesley farm case was pending. In 2007 the Pennoxstone Court inspector used expressions such as 'slight', 'moderately adverse', 'seriously detrimental' & 'high adverse impact' when considering the visual effects. In our view, only in those few instances where the impact is 'slight' should approval be granted. The polytunnels south of the A48 between Ross & Monmouth make a hugely adverse visual impact.	Agreed. Additional information is proposed to be included to confirm the special value of AONB's. See above. Comments to Inspectors Report are noted.
Leintwardine Group Parish Council	All rights of way and AONB's should be preserved.	Noted.
Pyons Group Parish Council	These paragraphs appear to have been ignored in the past.	Noted.
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	The section on Protective landscapes and AONB does not adequately reflect the current planning situation within Herefordshire, as recent judgements have indicated that polytunnels may be acceptable within an AONB. The wording of supplementary guideline 2 presumes against development within AONBs and dismisses the economic justification for them, the wording ought to be more flexible and acknowledge that development in these areas can be acceptable.	Guideline 2 states that where development is being weighed against landscape impacts then priority will be given to landscape over other planning considerations when in an AONB. This guideline follows UDP and national policy. No change.
Douglas Gardner - Marden Resident	The 'Detailed Assessment of Planning Issues' is weighted in favour of the commercial interests due to the description of the perceived economic benefit of this type of development as the foremost issue. It suggests that the Council are promoting the economic argument, and are not realising that the polytunnel developments are inappropriate in AONBs. It goes on to suggest that small scale developments may be acceptable in AONB's which one assumes is the individual tunnels that might be used by a small nursery business, but the paragraph goes on to refer to farming businesses, how can it be suggested that any type of this development is small scale? Any existing developments within the AONBs should be relocated on suitable sites outside it.	Changes are proposed to set out the context of national and local planning policy (see above). Current UDP and national policy does not totally rule out polytunnels within an AONB. Guideline 2 confirms the policy position that in marginal cases priority needs to be afforded to the landscape. No further change necessary.
Hayley Pankhurst - Natural England	The wording in paragraph 4.17 should be amended to identify that AONBs are 'national' statutory protected landscapes.	Noted and wording changed.
Paragraph 4.19		
Pyons Group Parish Council	These paragraphs appear to have been ignored in the past.	

Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	The phrase, 'amongst other things', suggests a more tolerant attitude to development in AONBs than UDP policy LA1 recommends. LA1 also requires the development to be small-scale, i.e. less than 1 hectare (see clause 5.16). It is difficult to understand how a full interpretation of LA1 could sanction large-scale polytunnels.	The phrase refers to the other instances when development will be permitted. All are required to be satisfied not just one. A change is proposed to make this clear.
Paragraph 4.20		
Pyons Group Parish Council	These paragraphs appear to have been ignored in the past.	Noted.
Paragraph 4.21		
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	The Wye Valley AONB Management Plan for the period 2004 - 2009 is the statutory Management Plan and as such must be adhered to in any planning decisions affecting this AONB. (see page 2, text by Ashley Thomas, Chairman of the Wye Valley AONB JAC)	Acknowledged. Changed proposed.
Hayley Pankhurst - Natural England	With reference to 'Section A: Protected Landscapes', Natural England recommend that the draft SPD be strengthened to provide greater clarity to applicants. It should be made clear that impacts on the AONB will be a material consideration, as per PPS7. Paragraph 4.21 must be corrected as AONB Management Plans are in fact a statutory document, required under section 89 of the Countryside and Rights of Way Act 2000.	Agreed. Changes proposed.
Paragraph 4.22		
Mr N J Cockburn - Grower	This para suggests only small scale tunnel development will be allowed in the AONB. This is contrary to Council's publicly stated policy, it should be amended to better reflect the situation, i.e. that tunnels at their present levels are acceptable in AONBs.	Paragraph 4.22 is considered to follow UDP Policy LA1. No change.
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	No reasons are given for the 'unfeasibility' of a blanket ban on industrial-scale polytunnels in AONBs. 'Small scale' appears to be under one hectare in total acreage; this should be clarified.	National and UDP policy refers to exceptions allowing development in AONB's. Following Government guidance each application needs to be decided on its merits. Small scale is not defined.

Chris Lambert - The National Trust	Polytunnels create landscape impacts that are capable of affecting AONBs even where the development is outside the AONB. The Council should have regard to this in accordance with Section 85 of the CROW Act 2000. Suggested change: Add reference to regard being had to impact on the AONB from development outside.	National or UDP policy makes any reference to development outside that may affect an AONB. Where such situations apply then consideration of the wider landscape impact would need to be considered in any landscape assessment.
Donna Tavernor - CLA West Midlands	As previously stated we have concerns over the legal issues surrounding the use of polytunnels. CLA are concerned that this paragraph implies that all forms of polytunnels will require some form of permission the CLA does not believe this is an accurate interpretation.	Whilst the SPD needs to be read as a whole a change is proposed to confirm planning permission.
Hayley Pankhurst - Natural England	Reflects UDP Policy LA1 by stating "There may well be instances where small scale tunnel developments may be acceptable". However, the SPD provides an opportunity to define 'small scale' and site context for polytunnel applications, overcoming a potential weakness of LA1. It is recognised that previous developments may have set a precedent on size. Therefore it is Natural England's recommendation that greater emphasis be placed upon requiring site specific assessments of landscape sensitivity and resilience, as alluded towards in paragraph 4.20 of the draft SPD. The requirement for applicants to provide an assessment of impacts should be made explicit, and applicants should be referred to Section 5 of the SPD for further information. The need to consider cumulative impacts is currently presented under the 'landscapes with no statutory designations section, but should instead apply to all landscapes, including the AONB.	It is not thought appropriate to define the size of what may be small scale. It is likely that this could vary between applications and would need to be considered in the context of the site, its location and characteristics. In respect of assessments changes are proposed to para 4.22 as recommended. The cumulative impact of polytunnels is addressed under Guideline 3 mainly on the assumption that only limited development will be allowed in AONB's and therefore the cumulative effect would not normally apply.
	the wording implies a presumption that there will be polytunnel development within AONBs. Natural England recommend that this section be amended to state that each case will be decided on its merits, and the potential impact on the AONB will be considered along with the wider economic and social benefits.	Noted and wording changed.
<i>Supplementary Guideline 2</i>		
Douglas Gardner - Marden Resident	This should be amended to read: 'It is recognised that agricultural polytunnels are not an acceptable form of development in AONBs'.	Acknowledged. A change is proposed to help make this clear.
Gary Woodman - Chamber of Commerce	AONBs, this is written with the presumption against tunnels and the economy, whereas the Cockburn judgement, some polytunnel development may be acceptable within an AONB.	Acknowledged. A change is proposed to make clear where development is acceptable.

Mr Peter Huyton - Resident	Object to the phrase 'in marginal cases'. This can be interpreted as only being applicable in marginal cases. It should be omitted so that, in accordance with planning policy LA1 and the AONB management plan, the guideline states that priority will be afforded to the landscape over all other planning considerations.	The guideline is proposed for change to help clarify when development is acceptable in line with UDP and national policy.
Duncan McCallum - DPDS Region	This is also a policy and should be omitted for the reasons given above. Furthermore it conflicts with the duties of the Council with regard to AsONB and with government guidance in PPG7. There must exception circumstances to allow major development in AsONB. The guideline should be omitted.	See above.
James Waltham - Haygrove Ltd	This section implies that planning applications will not be granted for polytunnels within AONBs. Recent judgements have established that some developments are acceptable. We suggest that the wording of the SPD reflects a more balanced view. It is essential that each site is judged on its merits.	The guideline is proposed for change to help clarify when development is acceptable in line with UDP and national policy.
Chris Lambert - The National Trust	While paragraph 4.22 sets out a reasonable discussion of the circumstances in which small polytunnels might be considered appropriate in an AONB, this is not well reflected in Supplementary Guideline 2. The guideline as a whole could also be seen to be a watering down of the protection given to AONBs in national policy and in policy LA1 of the adopted UDP. Suggested change: Revise Guideline 2 to Priority will be afforded to protecting the natural beauty of AONBs. Small scale polytunnel development may be accepted if it meets the criteria of UDP policy LA1.	See above.
Graham Biggs - South Herefordshire Growers Group	When farming inside or outside the AONB, crop protection such as polytunnels are temporary devices used by the farmer. There is no long-lasting damage to the landscape and no evidence of detrimental impact on tourism. The significant benefit to employment and the support to other businesses within the AONB must be considered at least as important for those businesses and employees living and working in the AONB as in other parts of rural Herefordshire. There is much written by both the Chamber and the NFU. Please see both responses.	Noted.
Nick Evans - Uni of Worcs and CRC	The term 'marginal cases' is open to wide interpretation and requires explicit definition.	Guideline 2 is proposed to change. See above.
Paragraph 4.23		

Ross & District Civic Society	Similarly for areas outside the AONB, a robust approach must be adopted. It needs to be stated somewhere that if permission is granted, it will be for a finite number of years before the position is reviewed. That period might be, say, 5 years only, notwithstanding the argument that growers need a longer period of certainty.	Development within non-designated areas will be expected to conform with UDP policy LA2. Applications will be guided by landscape assessments against the Council's Landscape Character Assessment.
Paragraph 4.24		
Aubrey Green - Arrow Valley Residents Association	What is meant by "intensively"?	Land used at a high productivity of cultivation.
Paragraph 4.25		
Aubrey Green - Arrow Valley Residents Association	Whole farm approach should be mandatory.	The SPD encourages growers to consider all of their future requirements rather than piecemeal. However this cannot be mandatory.
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	This clause suggests a greater level of protection for landscapes with no statutory designations than clause 4.22 affords for AONBs. The last sentence refers to 'new' planning proposals; what about existing developments, or retrospective applications?	A greater level of protection is afforded to AONB's and this is confirmed within the SPD. A change is proposed to delete 'new'.
Mr A Fraser - Marden Resident	Whilst agreeing with the sentiments presented there remains the problem where tunnels already erected have become significant yet no action has been taken to enforce their removal and reduce the eyesore to a level more in keeping with the local landscape. It follows therefore that a statement should be added stating that where an excess of polyunnels already exists planning action will be taken to reduce the acreage.	The Council has resolved to consider action in respect of retrospective application and existing developments that constitutes development. The SPD is to provide the guidance for planning applications.
Paragraph 4.26		
Dormington & Mordiford Parish Council	The parish council support the farming community in its need to diversify and maximise land use for productive and sustainable crops. However, we are concerned that large areas of the countryside is being marred by the high profile of polytunnels that dominate the landscape and detract from its natural beauty. We therefore welcome any initiative that reduces impact of such structures whilst allowing growers to make a successful living.	Noted.

Leintwardine Group Parish Council	To preserve heritage and environment along with animal welfare, headland and biodiversity no two adjacent fields should have polytunnels; to prevent cumulative impact.	The whole farm approach is encouraged to prevent adverse cumulative impact. Application for additional development would need to be considered on its merits using the SPD guidance. Planning conditions can be used to control development.
Mr Peter Huyton - Resident	While this refers to a whole farm approach to deciding on where polytunnels could be sited, it doesn't refer to any of the criteria that will be used in making a decision.	Each element of the development will need to be considered against the various guidelines of the SPD.
Aubrey Green - Arrow Valley Residents Association	"Whole farm" approach certainly needs detailing and defining. If a soft fruit company owns / runs six sites within a twenty mile area is this a single farm or six? Is a distinction made between owned and rented land? A limit on polytunnels in an area is necessary.	Para 4.26 is to encourage applicants to consider all of their future requirements. Normally this will relate to one farm holding but could be more. No distinction should be made between tenure. Each application will need to be considered on its merits.
Mr A Fraser - Marden Resident	The whole farm approach is in section 5 not 6, please correct. The intent of this paragraph is most laudable. However, there are two aspects not identified: a) If the farmer renting land applies for planning permission for polytunnels on that land it may be quite obvious he is attempting to extend the area of polytunnels without due regard to the environment. b) If the individual from whom the farmer rents the land applies for permission to erect polytunnels how is that aspect to be covered. I suggest both these points are identified and clarified.	Correction proposed. The SPD is to provide extra guidelines to polytunnel material. Matters of land ownerships are not subject to the SPD.
Nick Evans - Uni of Worcs and CRC	'year to year' rotation of polytunnels simply doesn't happen in practice.	Agreed. Change proposed.
<i>Supplementary Guidelines 3 & 4</i>		

<p>James Waltham - Haygrove Ltd</p>	<p>The SPD states that the local planning authority will seek to limit the total area of an agricultural holding or unit that may accommodate polytunnels, and specifically on whole farm applications, the area of land within certain landscape zones. It is our view that each application must be judged on its individual merits and therefore the basis of a restriction by total farming area, or zone, is extremely limiting. The suggestion of a percentage of land area approved for polytunnels is excessively simple as land is rented, and de-rented, at a greater frequency than new planning could possibly cope with. It is surely all about which fields are a problem and which are not. How much land a farmer happens to own or rent at a given time is an irrelevance to the appropriateness of a field receiving permission. At Haygrove we strive to lead the industry, and have some reputation for it, with example to other growers nationally of good practice in issues that are planning concerns (we have a lot of visitors and sell tunnels). These include more and more permanent mitigation</p> <p>measures on planning issues such as: landscape impact, e.g. tunnel specific tree and hedgerow screening; a 5 year plan on such landscaping that will visually be an increasing statement; surface water drainage avoiding erosion using grassed ditches and drains under roads; water recycling from tunnels for irrigation (half the farm) saving the water table. These have been invested in for the long-term future of the farm, the broader environment, and example. They have been independently recognised for their effectiveness. They are economically impossible without tunnels being able to stay where they are, and in fields where they are not a problem this would seem sensible for everybody. We suggest the county's economy and views and drainage and water use and health and safety (moving tunnels is no small task) will be better served by the SPD being bolder in recognising these realities and actually encouraging more permanence on fields that are not a problem. Planners should be directed by the SPD to positively seek these fields rather than it encourage seeing all tunnels as an illness to be minimise</p> <p>which is the SPD's present tone. Our county and nation demands the food from them and much more importantly the world desperately needs the simply vast air import substitution they provide! We suggest the SPD encourages the measuring of the relative weight and importance of these benefits more clearly, increases emphasis on the need to assess site by site, and avoids the over simplified broad spectrum limits presently proposed.</p>	<p>The purpose of the whole farm approach is to consider overall development instead of a piecemeal approach. This will help to set out for each holding where polytunnels may or may not be sited. This does not mean that all identified areas should be covered. This should help identify land more appropriate for development and ease the planning application process. The whole farm approach is to consider future needs and to address issues that may constrain them. Early involvement of officers/bodies on specific issues such as landscape, drainage etc will help prepare applications. This would also engage community discussion on such emergin proposals. A change is proposed to introduce the concept of whole farm plans early in the SPD to flag up this positive approach to guiding polytunnel development.</p>
<p><i>Supplementary Guideline 3</i></p>		

Gary Woodman - Chamber of Commerce	Cumulative Impact, limits to coverage. Each farm and location are different. It should be recognised that a percentage basis should not be applied in all cases.	Acknowledged. Each application will be dealt with on their own merits.
Graham Biggs - South Herefordshire Growers Group	The limit of a total area of a holding that may accommodate tunnels is to infer that the officers have a method by which they will work to pre-determine the acceptable crop protection for a given farm. This is simply wrong. We are encouraging members to file whole farm applications, these including both single and multiple site farms. All farms are different, all applications will be different. If listed in the SPD this will limit the officers in the execution of their duty and could mean crop protection is used in sites less favourable on all other grounds except the percentage of farm area. Please see chamber response.	Limits applied to the total area of polytunnels will be considered on a need to prevent cumulative development. No method to predetermine acceptable crop protection is undertaken. See also above.
Donna Tavernor - CLA West Midlands	Cumulative Impact – limits to coverage. Each farm and location is different. The CLA accepts that a whole farm approach is the best method to consider an application, however it should be recognised that a percentage basis should not be applied in all cases. The local planning authority need to be very careful when setting limits as to the total area of an agricultural holding may accommodate polytunnels p 14. Some businesses may have a larger proportion of polytunnels to the land they own as their business is structured in towards the use of polytunnels. Any limit in all likelihood will lead to a number of efficient and profitable growers being put out of business with knock-on effects to the rural economy., but it will also lead to an increase in the importation of soft fruit and vegetables thus increasing food miles and will have a consequential impact on the UK's CO2 emissions and climate change.	A percentage basis is not being applied. Restrictions will only be applied to safeguard any adverse impact that may be caused by cumulative development. Each application will be considered on its merits.
	In some cases screening or landscaping may make polytunnels acceptable in some areas. Experiments are taking place with non-reflective materials; this is still in the early stages of development and may affect the appearance of polytunnels in the future.	Noted.
Nick Evans - Uni of Worcs and CRC	This is a non sequetour as it contains a statement that is in no way derived from any of the preceding discussion or evidence presented.	The guideline is worded to reflect the concern of cumulative developments.
<i>Supplementary Guideline 4</i>		

Gary Woodman - Chamber of Commerce	Highway safety, this statement implies that farmers 'will' have to demonstrate vehicle access and that the highway network is adequate, however, working with growers we are aware that if agreed with officers of the Council this 'may be required'. Also, often in the farm locations there is no alternative means of transport and therefore a change of wording would be more representative of each individual case.	It is reasonable to expect that growers can demonstrate acceptable access within their proposals. This will include demonstrating that the local highway network is capable of sustaining additional forms of traffic. This follows UDP policies S6 and DR3.
Paragraph 4.27		
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	Use of non-reflective materials. It needs to be acknowledged that technology is continually developing and it would be counterproductive if the SPD didn't allow growers to try new mitigation techniques.	Agreed. Changed proposed.
Mr Peter Huyton - Resident	Periods of coverage , and Supplementary Guideline 6. This should state that as well as polythene being removed during periods when crops do not need to be covered, the hoops should also be removed. Vast areas of shiny grey metal hoops are also an eyesore and, since much of the policy is one of trying to minimise visual intrusion, the policy should also cover this aspect. It might be inconvenient for the farmer to have to remove the hoops, but since they're likely to be uncovered for up to six months of a year, removing and putting up hoops just twice a year is not a great demand and will have real benefits to the visual amenity of areas.	It is generally accepted that it is the polythene covering that has the greatest visual impact. Given the financial implication of removing metal hoops it is arguable whether significant visual gain could be argued. This would arguably amount to almost total removal of the development. No change.
Mr A Fraser - Marden Resident	The idea that the farmer should identify all fields where he proposes to rotate polytunnels is attractive. However the problem comes in enforcing the agreement and consequently a much firmer enforcement control will have to be implemented. Is the council ready for that? I do not have a section 6, pre-application procedures. It must be made clear in this document that swift action will be taken where planning permission has been granted subject to an agreed programme of landscaping and that landscaping is not undertaken which will result in the planning permission being withdrawn.	Noted.
Nick Evans - Uni of Worcs and CRC	There is reference to the removal of plastic from metal hoops. In a strict interpretation, this could be problematic as, technically, rolled back plastic is stored within the hoops over winter.	Noted. See also above.

Hayley Pankhurst - Natural England	Section (c) 'Mitigation' provides some valuable guidance in terms of landscaping/screening and periods of coverage. However, there are additional means of mitigating landscape impact which are not presented in this section. For example, the size of polytunnel blocks could be limited to break-up the total mass of polythene and increase the effectiveness of screening. Supplementary Guideline 5 meets with approval, but the concept of excluding polytunnels from the most sensitive locations within a site would be simplified by some lead-up discussion.	Agreed. Para 4.27 is proposed for change.
<i>Supplementary Guideline 5</i>		
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	The wording is not clear and 'significant' is highly subjective, it implies that development would not be allowed in any case.	The guideline indicates that visual intrusion will need to be significant for proposals to be rejected.
Mr Peter Huyton - Resident	Is good and should not be changed.	Noted.
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	This Guideline is commended particularly as it notes that, where mitigation is impossible, polytunnel development will not be allowed. It follows that, in areas such as the Wye Valley AONB, where the topography prohibits effective mitigation, such visual intrusions on the landscape will not be permitted.	Noted.
<i>Supplementary Guideline 6</i>		
Donna Tavernor - CLA West Midlands	Polythene removal - CLA accepts that polytunnels for soft fruit should not be covered with polythene during certain periods of each calendar year.	Noted.
<i>Supplementary Guideline 7</i>		
Donna Tavernor - CLA West Midlands	Careful consideration should be given to the affect that polytunnels have on the setting of listed buildings. In situations where polytunnels do not adversely affect the setting of the listed buildings then they should be allowed.	Noted.
Paragraph 4.28		
Aubrey Green - Arrow Valley Residents Association	Thorough analysis and well scoped Supplementary Guidelines. However no commentary on Scheduled Ancient Monuments. This is an oversight and paragraphs should be added. [e.g. Ivington hill fort near Brierley Court Farm]. Should a list of sites worthy of protection be drawn up?	Agreed. A new guideline is proposed under Archaeology which will include Scheduled Ancient Monuments.
Paragraph 4.29		

Chris Lambert - The National Trust	We agree that in the majority of cases, polytunnels are wholly inappropriate in historic parks and gardens. However there are instances in which they might not only be acceptable but would also positively contribute to continuation of historic garden uses. To give two examples from National Trust properties outside Herefordshire, the walled kitchen garden at Hanbury Hall Worcestershire contains polytunnels that sustain continuation of the historic use of this area as a place for producing food, plants and cut flowers. The polytunnels cannot be seen over the walls so do not interfere with the pleasure grounds. At Powis Castle, the glasshouses and polytunnels of the nursery complex are essential to the sustainable provision of plants for the historic flower gardens. The nursery complex is a long-standing element in the layout of the historic park and is discretely hidden by tree and hedge screening.	Noted. However the SPD addresses large scale polytunnels and the two examples given may not meet the criteria set out in the SPD.
<i>Supplementary Guideline 8</i>		
Mr N J Cockburn - Grower	Unregistered parks should not be given the same protection as registered parks; in many cases they no longer exist or are inaccurately recorded.	Noted. Within the UDP (LA4) unregistered parks of local importance are afforded similar but not the same protection as registered parks.
Chris Lambert - The National Trust	Polytunnel developments will not be permitted upon a registered historic park or garden except where they are consistent with the historic development of the park and garden and do not detract from the designed landscape or its historic significance. Developments will not be allowed that affect the settings of registered historic parks and gardens. The same approach will apply to unregistered parks and gardens identified by Herefordshire as having local importance.	Noted (see also above).
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	Goodrich Castle is a nationally important, historic site; the outlook from this vantage point is marred by the existing spread of polytunnels in the Wye Valley AONB plain below.	Noted.
Paragraph 4.30		

Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	As polytunnels are temporary structures used for agricultural production and the canal restoration project is a long term project we see no reason why polytunnels could not be sited within the safeguarded route.	Acknowledged. Whilst the canal is safeguarded under UDP policy RST9 it could be argued that polytunnel proposals are temporary structures that could be removed. Avoidance of the safeguarded route could be addressed through whole-farm plans. Para 4.30 and guideline are proposed for deletion.
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	It's a great pity that a now defunct canal with costly development implications as a tourist attraction seems to have greater protection than an existing AONB that already attracts a national audience.	Agreed. Change proposed.
Paragraph 4.31		
Ivor Davies - Marden Resident	HGV movements; apart from consulting the Highway Authority the residents in the area should be consulted as well.	Section 5 encourages pre-application consultation to enable local debate before applications are submitted. Should this not take place as part of the planning process, the immediate neighbouring property and local parish council will be consulted.
B G Mann - Marden Resident	Large HGV's use the small lanes creating dangerous situations.	Noted.
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	The Council should acknowledge that farms and rural businesses are totally reliant on HGV and car transport as there is simply no alternative.	Noted.
Aubrey Green - Arrow Valley Residents Association	Working hours of HGVs need to be given more prominence in this section as the early working hours produce strong concerns from nearby residents.	It is considered that the issues and concerns on lorry movements is well stated in this paragraph. No change.
Mr A Fraser - Marden Resident	After “damage to highway surfaces” add “and 13th century bridges”. Line 10: There will be an increase in the number of cars (not amount) please correct.	Wording has been changed to reflect these comments.
Nick Evans - Uni of Worcs and CRC	Extra traffic is generated where packing plants exist. They are more financially viable if fruit is imported for packing all year round. Vehicular movements are subsequently increased, but there is no recognition of this point.	Noted. However the general point within this para is that there is an increase in vehicular activity due to polytunnels. No further change is necessary.
Paragraph 4.33		

Leintwardine Group Parish Council	The increase in traffic and transport should be carefully monitored.	Noted. Transport assessments should help clarify additional traffic.
	New roads should be kept to a minimum.	Noted.
B G Mann - Marden Resident	Poor access routes into villages often on dangerous bends.	Noted.
<i>Supplementary Guidance 10</i>		
Mr N J Cockburn - Grower	Growers should not have to prove that access is adequate for a pre existing use.	Polytunnel development that causes an increased or different traffic/use on an access of a pre-existing use will need to demonstrate that this access is suitable for the development proposed.
Aubrey Green - Arrow Valley Residents Association	Proposed this paragraph should be more robust and reflect the restrictions that are placed upon members of the local community who are unable to use certain local roads. We suggest it reads as follows: "Polytunnel developments will not be permitted unless the applicant can demonstrate that the vehicular means of access(es) and the local highway network (in terms of both design and capacity) are adequate to cater with the traffic generation, addressing both numbers and types and that local traffic, including pedestrians, cyclists and horse riders are not impeded in any manner or their safety put at risk."	The requirements set out within the guideline are considered to be similar to those suggested. This might need to be demonstrated in a transport assessment. Potentially it is only the large scale developments which will require the transport assessment.
Mr A Fraser - Marden Resident	Add "the applicant must also show how vehicles will be cleaned of mud and other debris before accessing the public roads".	Arrangements for vehicle cleaning on site is normally covered in a planning condition should this be necessary. Mud on roads is a highways offence.
Donna Tavernor - CLA West Midlands	Highway Safety - this statement implies that the grower 'will' need to demonstrate the vehicle access and highway network is adequate. However the traffic generated for soft fruit production is only seasonal. Often in the farm locations there is no alternative means of transport and therefore a change of wording would be more representative of each individual case.	It is acknowledged that production is seasonal, however applications would still need to demonstrate that their proposals can be accommodated on highways/access grounds.
	Polytunnels should not obstruct public rights of ways, the public right of way system was put in place so that people could get from A to B. The enjoyment of the views was not a consideration. Whilst CLA acknowledges that PROW should not be blocked by polytunnels and associated farming operations, these operations should not cease in fields where there are PROW as this would be uneconomical for the local economy.	Noted. Development proposals affecting PROW will need to satisfy UDP policy T6. Existing operations are assumed to respect PROW where the Highway Act provides specific protection.
Paragraph 4.34		

B G Mann - Marden Resident	Public rights of way in the area have been abused and destroyed by migrant workers	Noted.
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	The importance of Rights of Way is correctly stressed. They are important in the enjoyment of the countryside by both residents and tourists. Where are the statistics for the latter?	Noted. There are no statistics currently available on the affects upon tourism.
Hayley Pankhurst - Natural England	Public Rights of Way - The guidance to consider distant views over polytunnels from PROW meets with approval. However, the elevated importance of National Trails should also be indicated here.	Noted.
Paragraph 4.35		
Mr N J Cockburn - Grower	This gives more protection to PROW than already exists under statute. Whilst tunnels shouldn't obstruct footpaths they neither should have to be any further away from footpaths than is required by law now.	It is important for rights of way to be protected and also short distant views.
Paragraph 4.36		
Aubrey Green - Arrow Valley Residents Association	PROW. Too limited a buffer. AVRA propose 10m & 15m respectively.	The guideline identifies minimum requirements. There may be other reasons to increase these distances. Each application will need to be determined on its merits, change proposed.
<i>Supplementary Guidance 11</i>		
Paul Seville - PROW	Should read: "There shall be no polytunnels erected within 2 metres of the centre line of a public right of way and no polytunnel sited within 3 metres of the centre line of a bridleway"	Agreed. Correction proposed.
Pyons Group Parish Council	Has been ignored in the Pyons Group area.	Noted.
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	As PROWs are protected under other legislation it is unclear what this guideline achieves.	The guideline requested the distance from the PROW that the polytunnel can be situated.
Duncan McCallum - DPDS Region	While this might protect the use of the footpath, it should also indicate that the impact on the leisure and recreational use of public footpaths and bridleways is a material consideration and in many instances, greater distances might be required or that planning permission may be refused.	The distances specified indicate the minimum distances. There may be other reasons to increase these distances. Each application will need to be determined on its merits. Change proposed.
Mr A Fraser - Marden Resident	For the sake of clarity change to read "...sited within 3 metres of the side of a bridleway."	Wording is proposed for change to ensure better clarity.

Paragraph 4.37		
Mr Peter Huyton - Resident	This is an important protection for the landscape of Herefordshire and should have the force of being a Supplementary Guideline.	Acknowledged. Change is proposed to guideline. This is also covered in guidelines.
Paragraph 4.39		
Aubrey Green - Arrow Valley Residents Association	No specification of by whom and by what criteria polytunnels are defined as "redundant".	Redundant will be assumed to have taken place when not required for use.
Charles Thwaites - Resident	In general, I felt the Residential Amenity section was very thorough, with most of the arguments being fully aired. However Paragraph 4.39 didn't get the section off to a particularly auspicious start. The box recording the supplementary guideline on redundancy of poly-tunnels is a non-sequitor to the discussion in the previous paragraph. I would have expected a somewhat more punchy guideline to follow such clear sentiments expressed in the first two sentences.	Agreed. Changed proposed to reorder this sub-section.
<i>Supplementary Guidance 12</i>		
Gary Woodman - Chamber of Commerce	Redundancy of polytunnels, the Chamber accept that if the tunnels are redundant they should be removed, however this guideline suggests it is related to the crop, if a grower wishes to change crop it is implying that they will have to reapply for planning permission, this is neither practical nor cost effective.	Agreed. Change proposed to delete reference to the crop.
Mr N J Cockburn - Grower	The word left out but underlined should be crops in order to negate the need to reapply for permission every time a crop changes.	See above.
Mr Peter Huyton - Resident	The six month period is totally inadequate. Para 4.39 refers to the particular problem of polytunnels in proximity to dwellings. It is bad enough that a family has to put up with polytunnels dominating their enjoyment of their property for a period of years. They should not have to wait another six months for redundant polytunnels to disappear, simply because the farmer isn't in a hurry to remove them. The six month period should be reduced to a maximum period of two months.	Within six months is felt a reasonable time from being classed redundant to removal. No change.

James Waltham - Haygrove Ltd	We accept that the position that if polytunnels become redundant then they should be removed, i.e. not remain in situ without a crop being produced. However, the supplementary guideline suggests a restriction on the crop grown, in terms of planning condition. If the grower changes the crop within any one polytunnel from strawberries to raspberries, the current wording states that the polytunnel should be removed and that the grower should re-apply for planning permission. This is impractical. Crop rotation is an essential part of the responsible management of the soil and the wider agricultural environment. This is particularly relevant for a farm such as Haygrove which is one of very few organically approved soft fruit farms. The ability to respond to rapidly changing demands of the market (eg right now) will inevitably result in the need to change the cropping mix as fast, or Herefordshire farms will be made uncompetitive by planning requirements, such as what growers choose to grow, that are surely not planning issues. This supplementary guideline is not practical.	Noted. See above proposed change.
Mr A Fraser - Marden Resident	Believe 6 months is overlong. Change to read 2 months.	See above.
Donna Tavernor - CLA West Midlands	Redundancy of Polytunnels. The CLA accept that if the tunnels are redundant they should be removed, however the suggested condition relates to a specific crop. However, if the grower decides to change the type of crop grown (strawberries to raspberries), this condition implies having to reapply for planning permission. This is not practical or cost effective.	Agreed. Reference to a specific crop is proposed for deletion.
	Noise can be an issue at some sites with polytunnels however it is already best practice to avoid noise nuisance. Applications should not be refused because of the intensification of use of existing vehicular access. Noise is covered by environmental health legislation.	Para 4.41 - noted. Noise is only one consideration of the development.
	The CLA accepts that best practice should lead to polytunnels a minimum distance of 30m from of a boundary of a dwelling.	Noted.
Nick Evans - Uni of Worcs and CRC	is it realistic to specify an individual crop?	The wording suggesting the individual crop has been deleted.
Paragraph 4.40		
Aubrey Green - Arrow Valley Residents Association	Rain on a large area of polytunnels causes a drumming effect which can be heard at a great distance. Recognition of this negative impact needs to be included.	Acknowledged. Changes proposed to para 4.40.

Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	There are many noise nuisances associated with the intensive scale of these operation. Here are a few more: tractor mounted irrigation pumps running all night, spraying machinery generating high noise levels for several hours each day early in the morning and late at night, rain on the tunnel covers, wind in the uncovered tunnel supporting framework, 2-stroke petrol engine driven augers used for tunnel erection.	Noted (see above).
Martin Field Clerk Bodenham Parish Council	This para. should include "persistent wind noise" as reported by Bodenham residents causing stress, loss of sleep and discomfort. Rain noise which is greatly amplified when falling on plastic sheeting also needs to be addressed.	Acknowledged. Changes proposed.
Nick Evans - Uni of Worcs and CRC	Refers to vehicular movements, yet these are not mentioned in the 'Residential Amenity' section.	Noise is a specific issue and is dealt with separately.
Charles Thwaites - Resident	To the causes of early morning noise needs to be added that of spraying, which often has to take place in the calm weather conditions that occur shortly after dawn. Slow moving sprayers create a high pitched whine that can affect local residents for a couple of hours at a most inconvenient time of day.	Noted see above.
Paragraph 4.41		
Mr Peter Huyton - Resident	These refer to all types of noise associated with polytunnels and yet Supplementary Guideline 13 refers only to noise associated with intensification of access or a new access. The Guideline on noise needs to be strengthened to include all types of noise nuisance from polytunnels.	Agreed. Changed proposed.
Mr A Fraser - Marden Resident	Noise is not just man made but is also due to rain and wind on polythene. Suggest these 2 aspects are included in paragraph 4.41 and SG113.	Agreed. Changed proposed.
<i>Supplementary Guidance 13</i>		
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	Some degree of noise is unavoidable and the SPD should distinguish between normal operational noise from farming activities and particular nuisances which are a matter for Environmental Health.	Acknowledged. Changes proposed.
Nick Evans - Uni of Worcs and CRC	Makes no mention of noise associated with the erection of polytunnels and with in-field depots (e.g. for straw).	Acknowledged. Changes proposed.
Paragraph 4.43		

Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	In May 2006 the Agricultural Waste Regulations came into force, this means that farmers can no longer burn most plastics, however they can still legally burn untreated timber, wood, bark and crop residues but need an exemption from the Environment Agency in order to do so. This para needs to be amended to reflect this.	Acknowledged. Changes proposed.
Mr Peter Huyton - Resident	This refers to recycling of sheeting being a preferable option. There appears in this document a lack of awareness of various pollution regulations which cover farming and other industrial operations, and which should result in one or more Guideline. This appears to be major gap in this document.	Acknowledged. Changes proposed.
Aubrey Green - Arrow Valley Residents Association	Burning is not acceptable.	Agreed. Change proposed.
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	'Local burning [...] is not a desirable option [...].' No it isn't desirable. In fact it has been illegal since May 2006 to burn or bury waste plastics on farms (see www.agwasteplastics.org.uk accessed 25 July 2008). The Agricultural Waste Plastics Collection and Recovery Programme oversees this legislation. Herefordshire Council should insist on plastic sheeting being re-cycled at appropriate centres regardless of some growers' apparent reluctance to obey the law.	Acknowledged. Changes proposed.
Mr A Fraser - Marden Resident	Change the last sentence to read: "Local burning of plastic sheeting is not permitted, the disposal of plastic sheeting must be undertaken via an approved process.	Acknowledged. Changes proposed.
Martin Field Clerk Bodenham Parish Council	Disposal of plastic sheeting by burning should be prohibited in view of the unacceptable pollution and nuisance it causes. Disposal by recycling as part of a registered scheme should be mandatory.	Acknowledged. Changes proposed.
Nick Evans - Uni of Worcs and CRC	A statement is made about 'difficult' plastic disposal, yet a scheme exists for plastic recycling, facilitated by Haygrove in Ledbury.	Acknowledged. Changes proposed.
Charles Thwaites - Resident	I wonder if saying that local burning of plastic 'is not a desirable option' is too much of an understatement. Surely this practice is illegal?	Acknowledged. Changes proposed.
Paragraph 4.44		
Mr Peter Huyton - Resident	While it is good to see a recognition of the problem lighting can cause, this section needs to be strengthened so that lighting is kept to an absolute minimum We should be trying to reduce light pollution, not aid its increase.	Agreed, Changes proposed.
Nick Evans - Uni of Worcs and CRC	Section on 'Lighting': there appears to be undue emphasis on an issue that was not once mentioned by anyone in our research.	Noted.
Aubrey Green - Arrow Valley Residents Association	Lighting should not be used within 100 metres of residences.	Acknowledged. Changes are proposed to limit external lighting to that necessary.

<i>Supplementary Guidance 14</i>		
Duncan McCallum - DPDS Region	The impact of lighting is capable of being, and likely to be, a material consideration in the decision to grant planning permission, and should generally be considered at that stage. This should be made clear in the SPD. We support the requirement to submit approval of lighting, but this should not be left to officers to determine but subject to public consultation and committee scrutiny.	Noted.
Paragraph 4.45		
Mr & Mrs Horton - Resident	The 50m gap from a dwelling is not sufficient when the polythene is fitted incorrectly or becomes loose. Can be very noisy in strong winds.	Noted. However this distance is seen to be reasonable in normal circumstances.
	The distance from our garden to the tunnels is not 30m, they abut our garden hedge and garden. This has caused health, noise and visual concerns.	Noted.
	There will be an abuse of the "zone of tranquillity", as the tractors will use this area when spraying etc...	Noted. Changes are proposed to allow other agricultural operations to take place.
	The sprays are unhealthy for the local residents. The short tunnels act as funnels for noise, spray and fumes, which surround the homes.	
	The early starts with noisy machinery is unreasonable to local residents	Noted.
	The farmers are not paying any notice to the need for planning applications and are continuing without permission.	
Ivor Davies - Marden Resident	Polytunnels should not be erected within 50 metres of a dwelling. But 400 metres of a garden fence would be more sensible.	Noted. However this is not considered to be a reasonable requirement.
Pyons Group Parish Council	Proximity to Dwellings: 30m is inadequate as a minimum distance to the boundary of a residential curtilage. Each case should be treated on its merits – after a set minimum distance has been decided.	Noted.
S & A Group - Grower	We support the concept of buffer zones, however the request of 50m in the SPD is arbitrary and should be flexible to consider circumstances such as topography of the site and natural screening to allow lower thresholds.	Changes proposed.
	While it is reasonable to expect such buffer zones to be kept free of polytunnels and their related development, it should be possible for a range of other (less intensive) farming activities to take place in these zones without causing material harm to amenity of adjoining residents.	Acknowledged.

Aubrey Green - Arrow Valley Residents Association	“...polytunnels should not be erected within a certain distance of dwellinghouses (sic)..... Deviations from this general safeguarding distance may be permitted in certain circumstances”. AVRA holds the 50 metre buffer should be unequivocal. No development or associated activity should be permitted with 50 metres of any residential boundary. No deviations should ever be permitted. If deviations are thought possible, the circumstances should be detailed upfront.	Changes are proposed to allow deviation only in exceptional circumstances.
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	Para 4.45 - The Council should have more progressive views on this issue. The 30m distance from properties came from an NFU voluntary code of practice and 50m from properties from the HC code. In the neighbouring Forest of Dean, the Council has stipulated a distance of 50 m between residential property boundaries and polytunnels. This was an improvement on the Herefordshire code since it recognized that gardens were part of what you refer to as ‘the zone of tranquillity’. Where surface water run-off has been a problem, the zone should be substantially increased above the 50 metres and the area should be permanently grassed.	Noted. Changes are proposed to allow deviation only in exceptional circumstances.
Mr A Fraser - Marden Resident	To be consistent with SG15 the paragraph should be amended to read: “...dwelling houses, normally 50 metres or 30 metres from the dwelling’s adjacent boundary with the polytunnels whichever distance is the greater.”	Wording amended to reflect this. Comment will be decided on case by case basis.
<i>Supplementary Guideline 15</i>		
Aubrey Green - Arrow Valley Residents Association	This is a critical guideline and not one AVRA expects to be subject to dilution by polytunnel users [growers].	Noted.
Duncan McCallum - DPDS Region	This is worded as a planning policy (see comments above). Each application would need to be treated on its merits and the wording amended to reflect that it is unlikely that the Council would approve applications within these distances, but equally there will be cases where greater distance is required to protect residential amenity.	Changes are proposed to para 4.45.
Paragraph 4.46		
Graham Biggs - South Herefordshire Growers Group	These are crops being grown with protection as part of normal farming practice. We believe it is totally impractical to operate buffer zones as currently described. Our members need to use these areas to access the fields, to maintain hedges, borders and ditches. Further, it should be permitted to plant these areas with crops not afforded crop protection. We would support the keeping of these areas clear from stored equipment and toilets but in all other ways should be used for normal farming practices. Please see Chamber response.	Acknowledged. Changes proposed.

<i>Supplementary Guideline 15/16</i>		
Mr N J Cockburn - Grower	Buffer zones are acceptable but the expression 'zone of tranquillity' will raise unrealistic expectations and should be deleted. In some circumstances and in agreement with the residents, it may be appropriate to site tunnels closer than 50m from houses and this guideline should be amended accordingly. Growers operate farming not tunnel businesses and this term also needs changing.	Agreed. Changes proposed. 'Zone of tranquillity' term deleted and the term 'buffer zone' used.
<i>Supplementary Guideline 16</i>		
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	The term 'zone of tranquillity' will be better described as 'buffer zones'. Normal agricultural operations must be allowed to continue in this zone such as hedge trimming & topping of grass margins. This guideline must make this clear, as many essential agricultural activities will be connected with the operation of a 'tunnel business'. We would also query the use of the term 'tunnel business'; these are normal agricultural businesses and farms.	Agreed. See above.
Gary Woodman - Chamber of Commerce	The Chamber is extremely concerned with this suggested policy as this could make operating an agricultural business impractical. The Chamber suggest that non-tunnelled crops are allowed to be planted in these zones, that vehicular activity and general environmental management can also occur. The Chamber can accept that no facilities or storage should be placed in this zone.	Agreed.
James Waltham - Haygrove Ltd	The area of land between a polytunnel and a residential amenity, referred to in the SPD as a "zone of tranquillity", is often used for important agricultural operations, e.g. hedge trimming. Additionally, in most cases this area is also valuable agricultural land, which could be used for non-polytunnel cropping. To establish these areas as "non-work" zones is not economically viable.	Agreed.
	In terms of Supplementary Guidelines 16 – Zones of tranquillity, the CLA is extremely concerned by the suggested policy, as this could make operating an agricultural business impractical. If the policy does not allow the use of these areas of the field for agricultural practice this is clearly unreasonable, as if the field had a non tunnel crop within then the farmer would still need to access the field around the edge. The CLA would therefore suggest a practical way forward, within these zones crops should be allowed to be planted, but not under tunnels, vehicle access and movement should be allowed in order to manage the crop, and that growers minimise the use of the area for use associated with the polytunnels.	Agreed. This guideline related to polytunnels and associated development. It is not intended to restrict other agricultural business. A change is proposed to para 4.46 to make this clear.

Donna Tavernor - CLA West Midlands	The CLA strongly advises that for efficient use of resource that good soil and water management is undertaken by growers to demonstrate. It is generally the case that temporary polytunnels are rotated around an agricultural holding in order to reduce the impacts on landscape, soil and water. CLA believes that careful consideration needs to be given to the use of polytunnels in areas of flood risk.	SG18 Noted.
	Winter storage reservoirs mean that abstraction of water over the winter months could be used in addition to rainfall to fill these storage facilities for summer irrigation. CLA believe the wider use of reservoirs should be strongly promoted in view of climate change.	Agreed. Change proposed.
	Following the cessation of polytunnels the land should be reinstated to its previous use for example arable field. Polytunnels are normally used as part of a cropping rotation on farms. Chemical usage in polytunnels is less than if the soft fruit was grown without cover.	Agreed. Noted.
Paragraph 4.47		
<i>Supplementary Guideline 17</i>		
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	We question why a flood risk assessment is automatic for all developments over 1 hectare without any reference to the site or the particular flood risk measures in any proposal.	
Duncan McCallum - DPDS Region	In granting planning permission for polytunnels, the Authority is granting planning permission for a structure for which information on the scale, mass, height and external appearance, including materials is defined. If the structure is not built to the plans permitted it should be subject to enforcement and it is not open to the owner to change these details without a new planning consent. This needs to be made clear within the SPD.	Noted. Implementation of any permitted proposal will be expected to be in accordance with plans and conditions.
Paragraph 4.48		
B G Mann - Marden Resident	Flooding is very bad now.	Noted.
Mr Peter Huyton - Resident	Good Farming Practice is a requirement for all agricultural businesses and requires prevention of soil erosion, control of runoff etc. See the websites of Defra and Natural England for details.	Noted.
Paragraph 4.53		

Andrew Ross - River Lugg Internal Drainage Board	The River Lugg Internal Drainage Board supports in principle the utilisation of Polytunnels as it recognises the economic and commercial benefits that can be realised for the local community. However, RLIDB does have some concerns over the widespread use of polytunnels which clearly has huge implications for surface water management, flood risk and biodiversity, it is the opinion of the RLIDB that the severity of these implications could be dramatically reduced by the implementation of practical, common sense measures that could be implemented through the planning process. These measures are: Providing surface water attenuation may consist of storage tanks or lagoons. This attenuation should provide live storage for 1:100 year rainfall event in the locality with a 20% allowance for the effects of climate change. Indicative figures are in the range of 500 to 750 cubic metres of live storage per hectare of impermeable area. Rates vary depending on soil types, usage, locality etc...	Agreed. Changes proposed.
	Discharging from surface water attenuation at Greenfield discharge rate. In Herefordshire this rate is approx 3.0 litres per second per hectare. Rates vary depending on soil types, usage, locality etc...	Noted.
	Discharging into existing drainage ditches or constructing them where they do not exist so there is a logical flow into the greater river system	Agreed. Change proposed.
	Constructing drainage channels/tile drains/French drains etc as necessary so that surface water runoff from Polyunnel development is captured effectively and directed into attenuation lagoons.	Agreed. Change proposed.
Justin Burnett (on behalf of Mark Davies) - Environment Agency West Area Planning	Management of Nutrient enriched water: We would advise that irrigation water with nutrient or other chemicals added, for example as part of a table top system must be carefully contained and re-circulated.	Noted.
	Run off from horticultural sites with large areas of impermeable surface or areas regularly trafficked can cause erosion of soils. Silt laden water discharging to a watercourse for example can cause detriment to habitat and carries nutrient including phosphate which can cause eutrophication. Rapid runoff from agricultural areas can also remove nutrients, herbicides and pesticides resulting in the pollution of watercourses. The risk of pollution can be minimised by careful siting of structures and management of drainage and irrigation water to minimise soil erosion and nitrification of waters.	Acknowledged. Changes proposed.
	We would advise that Applicants should carefully consider the location of polytunnels and the proximity of all watercourses/water features and incorporate appropriate pollution prevention and attenuation measures.	Agreed. Changes proposed.

	<p>We would also recommend that the following be incorporated at the end of Supplementary Guidance Box 19: "...designed to prevent run-off erosion issues and pollution of the water environment".</p> <p>This will allow the LPA to seek information of existing or proposed mitigation measures to attenuate runoff and prevent soil erosion and pollution of the water environment, in relation to the location of structures, tracks, covered areas and cultivated areas which may involve a survey of water features including existing drains streams, ponds, canals etc.</p>	<p>Agreed.</p> <p>Noted.</p>
Sarah Olney - Natural England	<p>Putting in a structure to clean the water before it reaches the canal - basically this should be a standard requirement below poly tunnels wherever there is a road, house or watercourse or any other sensitive area and should be put into the psd for polytunnels. This will speed up a move to table tops which are less environmentally damaging as long as they are allowed permanent sites where they can put in the infrastructure for water management and landscaping making them move them around discourages them from putting in the capital intensive infra structure and so is more damaging with regard to water quality and landscape.</p>	<p>Noted. Changes are proposed that address purification.</p>
Nick Evans - Uni of Worcs and CRC	<p>Growers will not invest in expensive water capture mitigation without permanent planning permission for polytunnels.</p>	<p>Noted.</p>
Hayley Pankhurst - Natural England	<p>Section (b) 'Surface Water Drainage' of the 'Water' section of 'Section 4: Detailed Assessment of Planning Issues' indicates that water management would be considered favourable. Natural England supports a requirement for active water management, but this must be based upon evidence and must not damage ecological assets. Paragraph 4.53 states that "Careful active management of surface water run-off can often be highly beneficial, including the use of drains and gulleys that allow water to be diverted into watercourses". Whilst the advantages of active water management are clear, this is about preventing harm rather than bringing actual benefit. This should be clarified. The guidance given in favour of directing run-off into watercourses raises concerns and does not constitute good practice. Run-off from polytunnels and their surroundings may be enriched with nutrients and/or sediment. Channelling this directly into watercourses could therefore contribute towards diffuse pollution. We recommend instead that the draft SPD promotes the use</p>	<p>Agreed. Changes proposed.</p>

	of sustainable drainage systems (SuDS) designed to slow the flow of water and filter out nutrients and sediment before it enters watercourses. We would support appropriate water recycling mechanisms which make the most efficient use of irrigation water and rainfall as a part of this. In all instances consideration must be given to 'pathways'; that is the route of water from its on-site source into its receiving watercourse. SuDS should be designed to minimise potential impacts upon highways, houses and ecological assets along this pathway.	
Paragraph 4.54		
Leintwardine Group Parish Council	Are water resources adequate?	Water is a valuable resource, its availability and quality needs protection.
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	This should also include a reference to the use of farm storage reservoirs, these are an extremely valuable tool which will help to respond to the impacts of climate change by storing winter rainfall for use during the summers.	Noted. Changes proposed.
Paragraph 4.56		
Rob Ireson - Environment Agency	To include the following paragraph: "The Environment Agency would seek consideration of an 'environmental report' detailing information on the proposed location of structure, covered areas and cultivated areas including a survey of water features including streams, ponds, canals etc... This should also include details of mitigation measures to be put in place to prevent soil erosion and pollution of the water environment.	Agreed. Change proposed.
Mr A Fraser - Marden Resident	It is all very well referring to polytunnel developments but existing polytunnel installations should be required to justify their abstraction when changing the area watered from the river or bore hole(s), whether or not trickle feed is utilised. This change to be included in the paragraph.	Noted. Abstraction licences for existing developments will be matters for the Environment Agency to consider.

Hayley Pankhurst - Natural England	The issues around low flow and over abstraction highlighted in section (c) 'Water Resources' are welcomed. This section could be linked with the previous section on 'Surface Water Drainage' and used as evidence to support water recycling. Paragraph 4.56 states that the EA seeks detailed information on proposed water use and management, and then goes on to discuss Sites of Special Scientific Interest (SSSIs) and Special Areas of Conservation (SACs). It should be noted that Natural England is the competent authority regarding these National and European level designated sites. Therefore we must be consulted on all applications potentially impacting on SSSIs and SACs, as well as Special Protection Areas (SPAs) and Ramsar sites. In such instances we would require evidence that the proposal would not have a detrimental effect upon the designated site, and would place a high emphasis upon water management using SuDS. In the case of SAC/SPA/Ramsar sites it is worth noting that it may also be necessary for an application to include a Habitat Regulations Assessment in line with the EC Habitats Directive 1992.	Agreed. Changes proposed.
Paragraph 4.57		
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	This clause defines 'significant scale' as sites (of polytunnel development) of more than 1 hectare (2.47 acres).	Noted.
Mr A Fraser - Marden Resident	Consider that you need to include the protection of boreholes (particularly those not belonging to the applicant) from drying up due to abstraction. Perhaps that requirement could be included in my proposed SG19a.	Noted. Paras 4.54-4.57 make clear the need to protect the availability and quality of water resources. No further change is considered necessary.
Nick Evans - Uni of Worcs and CRC	the trend towards table top growing delivers far greater water efficiency.	Noted.
Paragraph 4.58		
Mr Anthony Snell - Grower	Ecology surveys – soil-based temporary polytunnels being part of a farm rotation should NOT require surveys/reports at the same detail as those required by normal building works.	This will be decided on case by case basis and discussed with the ecologists.
Mr Peter Huyton - Resident	There should be reference to the need for compliance with the Wildlife and Countryside Act and other legislation dealing with the protection of species and habitats. See the websites of Defra and Natural England for details.	Further details have been incorporated to section 5 and further information for Biodiversity.

Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	This paragraph is Commended. Although the effects on the biodiversity are said to be 'not always apparent', this could be through many factors; the sterilisation and compaction of the soil must have a significant effect on the health of the relevant biodiversity. Local farmers have commented that crops grown on land rented out for previous intensive strawberry growing, under polytunnels, are not as productive as formerly.	Noted.
Hayley Pankhurst - Natural England	While the 'Biodiversity' section in 'Section 4: Detailed Assessment of Planning Issues' is broadly correct the level of detail provided is considerably lacking in comparison to other sections. Although it is acknowledged that landscape considerations may be of higher concern than biodiversity, polytunnel applications still have the potential to harm or enhance biodiversity interests depending on their execution. This draft SPD should make it clear that biodiversity is a material consideration, and summarise the relevant policy and legislation, making reference to the council's Biodiversity SPG. Reference should be made to the list of habitats and species of principal importance for the conservation of biodiversity given under Section 41 of the NERC Act, and to the Herefordshire Local Biodiversity Action Plan (LBAP), which identifies habitats and species in the county which are under threat and prioritises action to reverse their decline. Surveys required should identify any impacts on these habitats and species and opportunities to enhance them.	Acknowledged. Further details have been added to section 5.
Paragraph 4.59		
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	Requires clarification of this para needed as unsure what is meant by 'high quality land reinstatement'. The land is used for agriculture when it is covered by polytunnels for part of the year and they will continue to be used for agriculture. If they weren't used for polytunnels then they would be merely ploughed and used for another crop, so expensive mitigation work is not required.	The purpose of this para is to require any reinstatement of land on the cessation of use. This will be considered on an application by application basis. No further change is necessary.
Mr N J Cockburn - Grower	Soft fruit crops are agricultural and when tunnels are moved the land remains in agriculture. There has been no change of use in the land and there is nothing to reinstate. The land will continue to be cropped as normal. There will be environmental benefits from the way in which the land has been managed for shelter for the crops. This para should be deleted.	Noted. The purpose of this para is to require any reinstatement of land on the cessation of use. This will be considered on an application by application basis. No further change is necessary.
<i>Supplementary Guideline 3/4</i>		

Mr Peter Huyton - Resident	These refer to a limit of the total area that may accomodate polytunnels but do not refer to what the limit might be nor what criteria will be used to determine the limit.	Through Wide Farm Plans limited may be applied to polytunnel development. Each site needs to be considered on its merits.
<i>Supplementary Guideline 20/21</i>		
Mr N J Cockburn - Grower	Tunnels only occupy the more central parts of fields, with a buffer zone all around them, whereas other crops will be planted right up to the hedges. It is difficult to see how this practice might impinge on protected species. There is already a duty of care to protected species, this is duplication. As for seeking to create, restore and enhance habitats, the question why is asked when no harm has been caused in the first place.	Noted.
Paragraph 4.60		
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	A Supplementary Guideline for Archaeology should be part of this SPD which would strengthen the policies outlined in the UDP.	Specific advice concerning Archaeology is contained within the Archaeology and Development SPD. Whilst change is proposed to afford protection to the setting of Scheduled Ancient Monuments it is not expected that polytunnel development will have any adverse impact on other achaeological remains.
Chris Lambert - The National Trust	Para 4.60 - The section fails to establish that polytunnels that are harmful to the preservation of archaeological remains or their settings may be refused permission. We suggest that an approach is set in accordance with UDP and national policies which ensures the preservation of important archaeological sites and their settings as well as ensuring that the archaeological value of sites is assessed when developments are proposed. A Guideline on this point would seem appropriate.	Noted. Change is proposed to add further information in respect of any associated development ie lagoons/reservoirs where regard would need to be had to archaeological remains. See also above.
Nick Evans - Uni of Worcs and CRC	The 'Archaeology' sub-section is curious in that it is the only one that does not have a supplementary guideline.	Noted.
Paragraph 4.61		
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	This Clause is Commended. Reservoirs, and the disturbance caused by their construction, will create a permanent effect on the landscape.	Noted.

Donna Tavernor - CLA West Midlands	“reservoirs are particularly intrusive elements of a polytunnel development” –it is good farming practice to install winter water storage reservoirs as irrigation water can be sourced from the reservoir rather than other supplies. Careful design of reservoirs can mitigate their impact on the landscape and historical features.	Agreed. Changes proposed.
Paragraph 5.1		
Chris Lambert - The National Trust	The information provided in an application is clearly essential to the ability of the local planning authority to reach a decision and for third parties to be able to comment meaningfully. As a whole this section should be given greater force. For example, it should refer to the Council’s adopted Planning Application Requirements and the degree of information that is required to enable an application to be registered as valid. A Supplementary Guideline would emphasise the importance of this section, as would a change of title. Suggested changes: Revise title to “Planning Application Requirements”. Revise paragraph 5.1 to refer to the Council’s Planning Application Requirements document and the need for all relevant information to be provided in order for an application to be registered as valid. Add new guideline: Supplementary Guideline 22 Planning Application Requirements - Planning applications will only be registered as valid if they contain sufficient information. In assessing this, the Council will have regard to the criteria in its published Planning	Agreed. Changes proposed in respect of an additional guideline, this is not thought necessary as all information referred to has already been detailed.
	Application Requirements and the information contained in this SPD. The Council’s Planning Application Requirements outline the possibility of a Heritage Statement being required. This would be appropriate where polytunnel developments impact on the settings of the heritage assets such as archaeological sites, listed buildings, conservation areas and historic parks and gardens. A brief section on this would be welcome and would tie-in with Supplementary Guidelines 7 and 8 and our suggestion of a guideline for archaeological sites and their settings.	Within the SPD it outlines the need to protect heritage assets and the requirements for assessments as to the impacts upon them and further change is necessary.
Paragraph 5.2		
Mr A Fraser - Marden Resident	Understood that, normally, 6 copies of applications were required, not 4.	Agreed. Change proposed to follow the Councils planning application requirements.
Paragraph 5.7		
Chris Lambert - The National Trust	Guidance on the work required for landscape and visual assessment for different scales of polytunnel development would be helpful.	Guidelines are available through the references supplied in para 5.9.

Hayley Pankhurst - Natural England	The reference in paragraph 5.7 to "within visual proximity of the site" should be further defined to aid users.	The phrase is considered sufficient, it is not felt necessary to provide further detail.
Paragraph 5.9		
Hayley Pankhurst - Natural England	The 'Landscape or Visual Impact Assessments' section of 'Section 5: Additional Information' broadly meets with approval. The reference to the IEMA Guidelines is welcomed. Reference could also be made to Natural England's Joint Character Areas, available online at http://www.countryside.gov.uk/LAR/Landscape/CC/jca.asp . The reference to the Council's Landscape Character Assessment SPG given earlier should be repeated here for ease of use.	Noted. Additional references are proposed.
Paragraph 5.10		
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	The requirement for more than 'broad statements' from the applicant in their economic assessments is noted. Comments have been made in this document stressing the need for robustly evidenced economic arguments in the remarks above under: 'Section 4, Detailed Assessment of Planning Issues, General comment' and 'Economic Need and Impact', Clauses 4.3 to 4.12.	Noted.
Paragraph 5.11		
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	The reference to 'polytunnels [...] on a small scale' is noted. Clause 5.16 below defines large-scale as 'sites of 1 hectare or more'. Can it be assumed that the Council is defining small and large scale polytunnels in these terms? If so, this definition would be a helpful addition to Clause 1.6 under the heading, 'What are Polytunnels'.	The reference to 1ha or more relates to an Environment Agency threshold in respect of land of flood risk. It should not be taken that 1ha constitutes the Councils definition of large or small scale polytunnel developments.
Paragraph 5.12		
Aubrey Green - Arrow Valley Residents Association	What is meant by "large-scale"?	The 1ha is the threshold held by the EA as minimum in terms of flood risk.
Paragraph 5.15		

Mr A Fraser - Marden Resident	The downside to your suggestion that growers should work together to produce an economic analyses implies that one analysis will satisfy the planners for all planning applications. I would expect each grower to be responsible for his economic analyses and for it to be completed independently of any other grower. Under the circumstances it is probably better if you delete your over-long sentence about growers working together.	Noted. However there may be economic information that can be used by more than one grower.
Nick Evans - Uni of Worcs and CRC	Proposes adoption of a 'balance sheet analysis', but this is of questionable feasibility (how can anyone measure tourism 'uplift' - see point 22 above) and it is difficult to see what this will achieve. Appendix 2 also refers specifically to the situation in 'protected landscapes', as stated – what about non-protected landscapes?	It states in para 5.15 that the balance sheet in appendix 2 is specifically for protected landscapes where it is a requirement and is a suggestion for how to set one out. This para goes on to say that a similar balance sheet could be required for non designated landscapes. No further change is necessary.
Paragraph 5.16		
Virginia Morgan - Herefordshire Wye Valley AONB Association and Bob Widdowson - CPRE	Please refer directly above to the comments on 'large-scale' under reference p25, Clause 5.11.	Noted.
Paragraph 5.17		
Mr A Fraser - Marden Resident	I believe the Environment Agency should be included in this paragraph as having a level of approval of the proposal.	Agreed. Change proposed.
Paragraph 5.19		
Hayley Pankhurst - Natural England	Should be amended to state "A wildlife habitat survey carried out by a suitably qualified and experienced ecologist and at an appropriate time of year will be required ...".	Agreed. Change proposed.
Paragraph 5.20		

<p>Hayley Pankhurst - Natural England</p>	<p>The provision of further detail in the list of requirements supplied in paragraph 5.20 would help to clarify what is required of applicants. For ease of use Natural England's recommended amendments are shown below as if they were incorporated into the existing list. These recommendations do not amount to further surveys and therefore associated time and costs to the applicant, but should help to ensure that the information supplied is fit for purpose in the first instance. A records centre search and an extended Phase 1 Habitat Survey, conducted at an appropriate time of year and including an assessment of the presence of protected species and/or the potential of the habitats present to support protected species must be submitted with the application. This should include maps showing Phase 1 Habitats present, distribution of species and the location and type of existing and proposed polytunnels. Any potential impacts on these features should be identified (Note – information on badgers, if present, should be submitted in a separate confidential report). Further protected species surveys at an appropriate time of year will be required for any protected species that have potential to be present or have been found. Pre-application discussion with the county ecologists is recommended to ensure clarity in regard of survey and assessment requirements. A Natural England Licence is required for any development that would affect a European Protected Species. In addition to protected species, the presence of any priority habitats or species and LBAP habitats and species should also be identified along with any potential impacts. Any European sites such as Special Area of Conservation (SAC) or Special Protection Area (SPA) or nationally designated sites such as Sites of Special Scientific Interest (SSSIs) within a minimum of 2km of the proposal should be identified along with any potential impacts upon them. Natural England and the Environment Agency must be consulted as to the need for Habitat Regulations Assessment where a SAC or SPA may be affected. Any locally designated sites of wildlife or geological importance must be identified along with any impacts on them.</p>	<p>Agreed. Change proposed.</p>
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	<p>The assessment must identify and describe potential development impacts likely to affect the species and/or their habitats identified (these should include direct and indirect effects both on-site and off-site during site preparation, construction and subsequent working practices). Where harm is likely, evidence must be submitted to show: How alternatives designs or locations have been considered; How adverse effects will be avoided wherever possible; How unavoidable impacts will be mitigated or reduced; How impacts that cannot be avoided or mitigated will be compensated. In addition, in accordance with the local authority's duty under Section 40 of the Natural Environment and Rural Communities Act 2006 and PPS9 Biodiversity and Geological Conservation, proposals that will enhance, restore or add to biodiversity interests will be welcomed. The retention of existing trees on the site should be sought. A tree survey in accordance with BS5837:2005 Trees in Relation to Construction may be required. Pre-application discussion with the county ecologists is recommended to ensure clarity in regard</p> <p>of survey and assessment requirements. All proposals will require compliance with Herefordshire Council's UDP policies for nature conservation (NC1-NC9) and Government Guidance. (See Herefordshire Council's Biodiversity SPG for further information).</p>	
Paragraph 5.21		
Mr Peter Huyton - Resident	Delete "English Nature " (which no longer exists) and replace with 'Natural England'	Correction.
Nick Evans - Uni of Worcs and CRC	For an official document, there are surprising occurrences of instances of the use of cliché or colloquial English – 'to iron out potential problems...'	Noted. Changes are being proposed to eliminate inappropriate terms.
Charles Thwaites - Resident	I strongly believe in community consultation for large scale developments. There is probably some reason in law why you can only 'advise' applicants to enter this process. All the same, I feel the Draft should contain a sentence, perhaps at the end of Paragraph 5.22, requiring applicants to give reasons why a community consultation exercise has not been carried out.	Noted. Para 5.22 states that if the proposals are considered significant then community consultation should be carried out in accordance with the Council's SCI. It is not felt possible for the applicant to provide reasons why this has not taken place.
Paragraph 5.22		
Mr A Fraser - Marden Resident	I believe you should include a sentence to ensure that the Parish Council has confirmed that it has the same understanding of the outcome of any consultation as the applicant.	Noted. The consultation statement accompanying the application will detail the outcome of consultation which will be available to the public.

Paragraph 5.23		
Robert Hemblade - PROW	'Other Information', it states that, 'a variety of other studies or assessments may need to accompany certain planning applications ... ' and goes on to say that one of these is a 'Rights of Way Assessment'. We would like the name to be changed to 'Public Rights of Way Assessment' and that the requirement for a PROW assessment is included in the main Public Rights of Way Section at 4.34 to 4.37 rather than at the end.	Agreed. Changes proposed.
S & A Group - Grower	Whilst the S&A Group is generally in agreement with the scope of supporting information identified, it's important that the requirements placed on growers are not unduly onerous and that a consistent approach is adopted.	Noted.
	The additional information required with planning application is very costly to the businesses; consideration needs to be given the scope of information that can be reasonably required up front and which can be adequately dealt with as a condition to grant planning permission.	Acknowledged. The scope and form of information required will vary and needs to be determined with the Planning Officer.
	Supporting information should be kept straightforward and concise as possible.	Noted.
	The SPD should make reference to the Environmental Impact Assessment (EIA) regulations, as large-scale use of polytunnels may fall within the scope of the regulations and require a full Environmental Statement.	Agreed. Change proposed.
Paragraph 6.2/6.3		
Mr Robert Hodges - Resident	The granting of permanent planning permissions will have a significant impact on tourism, the effects of individual sites may not yet be fully appreciated. The granting of temporary planning permission for 10-12 years might be an appropriate solution.	The use and consideration for temporary permission is set out in paras 6.1-6.3, clearly there are instances when a temporary permission will be preferred.

Charles Thwaites - Resident	The arguments put forward against Temporary Planning Permissions are rather weak. I agree that 3 or 4 year permissions are not sufficient periods in which the grower can plan, but why can't the Council think in terms of longer periods for some crops, say 10+ years? There may be development control reasons for this (development being deemed lawful after a certain period, for instance), but I feel the next draft owes those of us who believe that time limits on blocks of polytunnels can provide at least some measure of certainty an explanation of why even lengthy temporary permissions are not an option. Tantalisingly, the Draft revisits the concept of temporary permissions when discussing whole farm plans at Paragraph 5.32, but I assume this again is in the context of short-rotation fruit.	Noted. No specific time period has been discussed in the SPD it merely states potential time limits will be determined on a case by case basis if needed.
Mr Peter Huyton - Resident	This refers to people having to put up with polytunnels for only three to four years (as if this was ok) but it doesn't recognise that moving a tunnel to the next field may mean no real benefit to a house or houses suffering from polytunnel proximity. Nor to the views from further afield.	Noted. However guidelines on proximity to dwellings and other mitigation requirements may help.
	This refers to possibility of permission for tunnels for much longer than three years (- could be 10 or 15 ?). What is to stop a grower claiming permanency for permission where a development is in place for more than 4 years - as happened at Pennoxstone at King's Caple?	Applications to extend temporary permissions or make them permanent should be determined on a case by case basis.
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	We welcome the acknowledgement that planning permission must be tailored to the crop requirement as they vary considerably.	Noted.
Aubrey Green - Arrow Valley Residents Association	Any "temporary" application must show why the period claimed is essential.	Temporary permissions would be expected to reflect the time related need of the crop.
Duncan McCallum - DPDS Region	In determining planning permissions it is open to the Council to impose time limit conditions where they would overcome an objection which would otherwise lead to the refusal of planning permission. Within the guidance on conditions (circular 1/95) it might be appropriate to do so. However, within a pattern of rotation, it should be noted that if polytunnels are taken down, planning permission will be required for their re-erection. SPD cannot take away the need to apply for planning permission for development. The SPD does not make this clear and the advice on Whole Farm Plans risks misleading people and is likely to lead to legal action.	Noted. Whole farm plans allow the application to demonstrate the rotational pattern of polytunnels across the whole farm for a set period, these whole farm plans will be looked at on a case to case basis. No wording changed. Planning permissions for whole farms need to make clear where removal and re-erection can take place.

Mr A Fraser - Marden Resident	In many instances strawberry plants are replaced every calendar year, as are raspberries. Under those circumstances a move every 3 years might be appropriate.	Noted.
Paragraph 6.7		
S & A Group - Grower	Whole farm applications are desirable when the applicant has only a single and small site for business operations, however, for those who have large scale and with multiple sites there needs to be more flexibility.	Noted.
	S&A Group have developed a 'Master Plan' which identifies our development requirements throughout the County, thus enabling consideration of the overall impacts of the business and the benefits associated with consolidating the business at particular locations.	Noted.
Aubrey Green - Arrow Valley Residents Association	"whole farms" again not defined	Whole farm relates to the plan submitted by the applicant to cover the rotation of polytunnels across the entire farm site for the duration of time.
Donna Tavernor - CLA West Midlands	Under the new planning-related fees guidance in circular 04/08 it would be cheaper for a farmer to submit separate planning applications for separate polytunnels as currently the SPD would result in higher planning application fees for the farmer. The CLA suggests that the SPD should refer to the circular and minimise the cost of planning fees on the growers in particular: Glasshouses and polytunnels (category 4)	Noted. However it would depend upon the separate applications submitted as to whether this would be a cheaper option.
Paragraph 6.9		
Mr A Fraser - Marden Resident	No objection to this paragraph in principle although I do have concerns as to how it will be policed to ensure compliance, particularly when there is a relatively small enforcement organisation.	Noted.

Nick Evans - Uni of Worcs and CRC	Overall – there is much emphasis here on pre-application consultation, yet this is an area that attracts strong criticism amongst all actors (varying from planners not venturing into the field to differences between planning officers’ advice and planning committee decisions). The ability to ‘time limit’ permissions seems compromised. Once zoned (5.32), can changes be made (rigidity argument)? How will objections be dealt with? How will enforcements be made – the SPD says nothing about this? How will environmental standards (to which the SPD is biased) be balanced against social (quality of life) standards?	There has been a strong requirement and support for pre-application advice to help the applicant ensure that they collate the correct detail which in turn will benefit local residents and expenditure from the applicant. Temporary planning applications will be determined on a case by case basis, objections and any enforcement will be considered through the Councils planning procedures.
Appendix 1		
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	Economic criteria; this table does not include any reference to the economic links to other upstream and downstream local businesses. This is a highly important economic criteria when examining the business contribution to the local rural economy. The table should include links with: Agricultural suppliers, Agricultural Engineers, Electricians & plumbers, caterers, fuel and energy, local services and facilities and produce supplied to local shops etc...	Noted. The criteria is to help applicants set out their business case. Benefits to others could also be bought out in the application.
Mr Peter Huyton - Resident	Since any objections to a planning application are made public, much if not all of the information provided by an applicant as indicated in this appendix should be made publicly available. How else will objectors know the basis on which planning application is decided?	Information provided with a planning application is normally available to public scrutiny.
Appendix 2		
Sarah Faulkner – NFU West Midlands Region & Matthew Price NFU Ross & Ledbury branches	Economic Balance sheet analysis: The objectives should include a reference to the local rural economy for the reasons outlined above.	Acknowledged. See above.
Gary Woodman - Chamber of Commerce	The data for this appendix does not exist or is not available to any organisation therefore it is deemed unreasonable.	It is considered that much of that contained could be reasonably identified. It is to assist the applicants case.

Donna Tavernor - CLA West Midlands	Finally in terms of the Appendix 2, the CLA believes that this approach of the economic balance sheet analysis is not practical for each grower to complete. As the document recognises in 4.12 there is little statistical evidence produced by the Council or others on the effect of polytunnels on tourism. Each grower can provide the details related to his/her operation as highlighted in Appendix 1, but the data for Appendix 2 does not exist or is not available to any organisation therefore can only be deemed unreasonable.	The analysis shows the components that may need to be considered. It is acknowledged that not all will be required and some can be pooled between growers.
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