



Kent

27 Audley Avenue, Tonbridge, Kent TN9 1XF

Planning Officer
Tonbridge and Malling Borough Council
Gibson Buildings
Gibson Drive
Kings Hill
KENT ME19 4LZ

16th April 2009

Dear Sir or Madam,

Re: planning application 08/03739/FL – polytunnels Hugh Lowe Farms Ltd

I would like to object to several elements of the above planning application and make some suggestions as to conditions which should be attached to any permission which may be granted. I do so I have relied on “Polytunnels: Supplementary Planning Document: December 2008 form Herefordshire Council A Council which has considerable experience in controls over polytunnels.

The first section of this letter refers to specific sections of the planning application as submitted to the Council. The second part refers to miscellaneous issues.

Section 7 of the planning application states that no **storage area for waste** and no arrangements for separate storage and collection of recyclable waste will be made.

This is contrary to best practice as encapsulated in the Herefordshire Supplementary Planning Document of December 2008

“4.34 The majority of plastic sheeting used to cover polytunnels is not yet biodegradable and is therefore difficult to dispose of once it needs to be replaced... Conditions could be used to ensure that waste plastic is disposed of promptly and appropriately in accordance with waste regulations to avoid nuisance to the local environment. Similarly if a polytunnels operation ceases for any reason the owner should be made to remove any waste plastic promptly and completely and be suitably recycled in the approved scheme. Whilst burning of plastic is not permitted by regulations, recycling of sheeting is to be undertaken at appropriate facilities”

No such provision has been made by the Council against this planning application

Section 10: Material used is described as clear plastic – no reference is made to the use of low reflective polythene in order to reduce the visual impact and glare.

Section 10 Boundary treatments: existing hedge and shelter belts are mentioned but there are no proposed additions to screening to minimise landscape impact. Indeed in the appended visual appraisal of the site at several points the comment is made that “little can be done”

Section 13: Assessment of flood risk

The entry on **Surface water** refers to sustainable drainage system unspecified. There is no provision for water management. This contrasts with the use of rain water collection at Thanet Earth green house complex to minimise water use from outside sources. Why is this not a requirement of this application?

“4.52 The Environment Agency does, however, seek detailed information on proposed water use and water management from prospective polytunnels developers; hence these are material considerations in determining whether or not to grant planning permission... 4.52 Planning applications for polytunnels on a significant scale (on site of 1 hectare or more) should therefore detail the proposed water use in the context of the catchment area and water management techniques through the production of a detailed Water Resources Study/ Audit.”

This application is significantly larger than 1 hectare but there is no such study or audit accompanying these plans.

Section 14: Biodiversity

The applicants claim there are no protected and priority species, designated sites, important habitats or other biodiversity features on the site yet there is no evidence of any surveys of the site being made. Again I refer you to the Herefordshire SPD

“4.54 Since the effects on the biodiversity of an expanse of polytunnels...are not always apparent; any planning application or polytunnels should include an ecological survey/ analysis.”

Section 16 The applicant claims that there are no **trees or hedges** on site – yet the visual appraisal mentions boundary hedges and wind breaks. These are then shown on the map of the project. The applicant is therefore avoiding a duty to survey and itemise the trees on site.

Section 20 Employment No additional employment is envisaged from this extremely intrusive scheme yet it is claimed in the letter from Berry Gardens Ltd. that there is an economic benefit.

Section 21 Hours of opening – unknown

“4.31 Those living in close proximity to agricultural polytunnels have indicated that there is an appreciable amount of noise generated through the elements and also by the often significant numbers of fruit pickers during the harvesting season...his can be exacerbated by the use of radios being played at high volume...”

4.32 conditions can be attached to permissions which regulate the times when noise-generating activities can take place.”

Some of these polytunnels will be situated quite close to residential areas. For the sake of local residents I would hope that the Council would impose such conditions.

There appears to be no mention in the application the exact nature of rotation of the

polythene coverings

“Supplementary Guideline 6: The local planning authority will normally attach a planning condition to any grant of planning permission ensuring that polytunnels are not covered with polythene during certain period of each calendar year.”

Proximity to dwellings

Supplementary guideline 9: No polytunnels or associated development (works, storage, servicing, accesses, toilets etc) shall be sited within the minimum distance of 30 metres of the boundary of any residential curtilage and 50 metres of any dwelling which ever distance is the greater.”

I hope the Council will impose such a condition

The letter from Berry Gardens Ltd makes a convincing case for **table top growing** – it is conducive to the health and well being of fruit pickers. However, this is likely to increase the height of the polytunnels Herefordshire have two recommendations here.

“Supplementary guideline 11 : The local planning authority will attach a planning condition to any grant of planning permission controlling the **height of the polytunnels(s)** above existing ground level.”

“1.9 Without the need for rotation [table top growing] means that these polytunnels can be located in the least sensitive landscapes within an individual site.”

I do hope the Council will take this into account.

The size of this application is considerable. The area of polytunnels proposed at any one time is 430 acres - approximately a third of the site. The total area of polytunnels in the whole of Herefordshire for 2005 was 420 acres. The proposal therefore seems to be oversized and intrusive. I do hope the Council will take full consideration of all issues raised and if permission is granted impose such conditions as will ameliorate the adverse affects this proposal seems bound to have.

Yours faithfully

Hazel Dawe, Chair

Kent Green Party