

# Polytunnels Planning Guide

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## Section 1: Introduction

### **Role and purpose of planning guide**

- 1.1 With the continued increase in the use of polytunnels for agricultural soft fruit production within the county, Herefordshire Council has prepared this planning guide to help potential developers prepare their planning applications. It will also provide useful information to officers of the council and other interested parties, local residents for example, on how the council expects the many planning considerations to be addressed within applications for planning permission.
- 1.2 The Polytunnels Planning Guide 2018 replaces and updates the Polytunnels Supplementary Planning Document (SPD) 2008 and prior to that, a previous voluntary code of practice. It will assist in clarifying which types of polytunnel development will require planning permission and highlight the planning policy issues and requirements such proposals will be expected to address. It will expand upon and provide more detailed planning guidance on a number of relevant, but non polytunnel-specific Core Strategy policies.
- 1.3 This polytunnels guide will provide invaluable planning advice, however it has not been through a formal public consultation process or sustainability appraisal and therefore cannot constitute a formal SPD.

### **What are polytunnels?**

- 1.4 Typically a polytunnel consists of galvanised steel hoops covered with transparent polythene sheeting and is used for crop protection from the weather. There are various sizes with differing materials used in their construction and also have variations in their methods of fixing to the ground. How they are assembled and the level of on-site construction required also differs depending on the type of polytunnel used. Many tunnels used in soft fruit production tend to be 'multispan' structures, where two or more tunnels are linked to form a much larger structure. Technology in this area is expanding apace and additional extras such as ventilation kits, irrigation systems or windows, as well as alternative materials, have been introduced.
- 1.5 This planning guide is primarily concerned with the farm-scale commercial use of polytunnels for crop protection, where they are used for the production of soft fruit. Poly tunnels provide the benefits of extending the growing season by protecting the crops from inclement weather, widening the variety of crops grown and providing some protection against pests and diseases, thus reducing the need to spray fungicides and other crop protection chemicals. Poly tunnels also enable harvesting to continue uninterrupted throughout the season in reasonable working conditions. Other benefits to soft fruit producers will be identified later in this document.

### **The increasing use of polytunnels**

- 1.6 Food security is an issue of concern for the UK. It is important that quality food is produced in Herefordshire in order to meet our own needs and those of global markets. The challenge in the 21<sup>st</sup> century is to increase productivity, maximise output and adapt to a changing climate. Soft fruits grown in Britain, such as raspberries and strawberries, have become an important and successful rural business. Defra statistics<sup>1</sup> show that home fruit production has steadily increased

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<sup>1</sup> Defra Horticulture Statistics 2015

since 2005 and reached 777 thousand tonnes (worth £695 million) in 2015. This was an increase of 9.6% on 2014, driven by demand for soft fruit, larger yields and a longer growing season. This contributed to nearly 18% of the total UK supply of fruit in 2015, 3.5% higher than in 2014, showing increases in nearly all sections.

- Strawberries were worth £284 million in 2015, up 16% on 2014, the highest recorded value. Production reached a new high of 115 thousand tonnes, up 11% on 2014
- Raspberries were worth £124 million in 2015, an increase of 14% on 2014, with production falling by 2.9%, against the record high of 2014 to 17 thousand tonnes
- Cherries were worth £14 million in 2015, equivalent to 2014, with production rising by 18% to a new high of 4.7 thousand tonnes

- 1.7 In 2015, agriculture, forestry and fishing accounted for a greater proportion of gross added value (GVA) in Herefordshire (8%) than in England and the West Midlands (1%). In 2016 this was the county's largest industry with 2,410 business, accounting for 24% of total businesses in Herefordshire.
- 1.8 The local authority breakdown for key crop areas on agricultural holdings shows that in Herefordshire between 2010 and 2013, the amount of land used for the commercial growing of fruit and vegetables grew by 8%<sup>2</sup>.
- 1.9 The success of the British fruit growing industry can be largely attributed to the use of the polytunnel (sometimes called a Spanish tunnel), which was introduced into British farming in 1993. Before this, British soft fruit was seen as an unreliable product, which was subject to the vagaries of the unpredictable weather conditions and was prone to disease and damage. Today, the polytunnel is used to protect 80% of the soft fruit sold through the supermarkets. It provides protection not only to strawberries, raspberries and blackberries, but to tomatoes, onion, potatoes, peppers and flowers. This means that British growers can produce consistently high quality fruit which the supermarkets demand, over several months of the year. The DEFRA website outlines a number of advantages to this method of fruit production.  
<http://adlib.eversysite.co.uk/adlib/defra/content.aspx?id=000HK277ZX.0C8ZP2JTQEA6BM>

#### **Table top and raised bed growing**

- 1.10 Recently soft fruit production has evolved and many growers are using the 'table top' method of production, whereby crops are grown in raised beds. The plants grow in substrate bags or trays containing coir, peat or coco peat which sit on platforms, raised a few feet above ground level. The raised beds are connected to a system that irrigates the crops and provides necessary nutrients. Such crops are grown within a polytunnel-protected environment.
- 1.11 As the crops are not grown in the ground, there is no need to rotate them in the usual way. Although this method of production requires significant financial investment, it could also reduce landscape and visual impacts. Table top growing requires less land and without the need for rotation, this means that in future these polytunnels could be located in the least sensitive landscapes.
- 1.12 In terms of planning, the use of table top growing methods will mean that polytunnels and their associated infrastructure could be erected on a more long-term basis. In addition, it would seem logical to suggest that since plants are grown in substrate,

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<sup>2</sup> Herefordshire Facts & Figures 2017

the location of the tunnels would not be soil dependent and they could potentially be located in non-agricultural environments. Although it is recognised that being near to a reliable water source is necessary for irrigation and a significant amount of land is likely to be required.

## Section 2: Planning context

### **Polytunnels and planning control**

2.1 Is planning permission required for polytunnels? The erection of polytunnels to support sustainable food delivery has become an important part of the approach to soft fruit farming. Whether they are development will depend on the individual circumstances such as the extent, size, scale, permanence, movability and the degree of attachment to the land of the polytunnels. Whilst their planning status has been open to interpretation, it has been accepted through the courts that if a polytunnel proposal is of significant size, has a substantial degree of permanence and physical attachment to the ground then it does constitute development that requires planning permission.

2.2 The question of whether or not polytunnels require planning permission is found not in legislation but in case law around tests relating to size, permanence and physical attachment. Whilst the law has been open to interpretation, it has been accepted that if a polytunnel proposal is of significant size, has a substantial degree of permanence and physical attachment to the ground, then development requires planning permission. This position was established at the end of 2006 when the High Court heard an appeal by the Hall Hunter Partnership against a decision by the Secretary of State dismissing two appeals involving enforcement notices relating to polytunnels and other various related works and development at Tuesley Farm, near Godalming in Surrey. One of the enforcement notices was against the construction of 40 hectares (99 acres) of 'Spanish' style agricultural polytunnels. In dismissing the appeal, Mr Justice Sullivan ruled that the polytunnels did constitute 'development'. He highlighted the substantial degree of their physical attachment to the ground, the work and man-hours required to erect and dismantle them, their degree of permanence, and their size and cumulative impact. Conversely there will be smaller, occasional examples of polytunnels that do not require planning permission (e.g. small structures covering for plants/crops in gardens or allotments, low tunnels, French tunnels and cloches /sheeting covering plants in fields at ground level for agricultural use).

2.3 For any proposed development, not just polytunnels, the size of an agricultural holding is important. If a holding is of five or more hectares, then there are certain permitted development rights under the Town and Country Planning (General Permitted Development) Order 2015. Part 6 relates to agricultural and forestry development and allows for the erection of a 'building' which is reasonably necessary for the purposes of agriculture within that unit. Thus a polytunnel may be covered by this and would not require planning permission, with only a prior notification being needed. However, if several are proposed, then there are restrictions on size and siting. Regulations state that the area such a 'building' can cover is 465 m<sup>2</sup>.

2.4 Finally, where there is uncertainty over the need for planning permission or prior notification, contact should be made with the council's development management officers, who will be able to provide case specific advice. The local planning authority is responsible for deciding whether any type of planning permission is required for a particular development. In cases of doubt, a procedure known as a lawful development certificate exists and this may be submitted to a local planning authority by a grower to establish whether planning permission is required.

























on the landscape and setting of designated and other national or regionally important sites. These impacts will be assessed at the pre-determination stage of a planning application and, where appropriate, propose mitigation measures to address any adverse impacts.

- 4.32 The effect of a development on the character and setting of listed buildings is a particular material consideration in determining planning applications, since there are a plethora of such buildings throughout the Herefordshire countryside. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving listed buildings or their settings. The NPPF, paras 132 and 133 set out the exceptional circumstances of achieving substantial public benefits, whereby significant harm to or loss of designated heritage assets may be sufficient to outweigh the adverse impacts. The Core Strategy similarly contains policy LD44 which seeks to protect the historic environment and heritage assets. Whether or not a polytunnel development would adversely affect such a building should be assessed by a relevant historic buildings/conservation expert, who will provide guidance to the council to determine whether or not impacts are sufficiently detrimental to warrant refusal of an application on these grounds or suggest mitigation measures where necessary.

**Planning guideline 7: designated heritage assets**

**When considering proposals for polytunnel development and their effect on the significance of designated heritage assets, great weight should be given to the asset's conservation. Proposals which would result in substantial harm or loss of designated heritage assets such as grade II listed buildings or historic parks and gardens and SAMs should be exceptional. Substantial harm or loss of heritage assets of the highest significance (SAMs, grade I and II\* and registered parks and gardens) only be refused, unless it can be demonstrated that such loss or harm is necessary to achieve substantial public benefit that outweigh the harm or loss.**

**(NPPF, paras. 132 & 133)**

**Residential amenity**

- 4.33 In areas where polytunnels are erected close to dwellings, local residents are frequently aggrieved by a number of issues which affect their residential amenity, including:

**Proximity to dwellings – mitigation**

- 4.34 A condition could be imposed stating that polytunnels should not be erected within a certain distance of dwelling houses, for example 50 metres, depending on the scheme in question. Deviations from this general safeguarding distance may be permitted in exceptional circumstances and where topography and natural screening of the site allows. The distance of 50 metres was previously used in the Polytunnel Voluntary Code of Practice.

**Planning guideline 9: residential amenity – distance from dwellings (buffer zones)**

**No polytunnels or associated development (works, storage, servicing accesses, toilets etc.) shall be sited within a minimum distance of 30**

**metres of the boundary of any residential curtilage or 50 metres of any dwelling whichever distance is the greater.**

- 4.35 If such a requirement is part of a permission, then it will also be made clear through the use of planning conditions, that any 'buffer zone' must be kept free from all associated storage and not be used for general activities connected with the operation of the tunnel growing or harvesting. This requirement only relates to the associated operations of the polytunnel development. Normal agricultural operations including crop growing and access to fields or crops for management will not be excluded. This is necessary to ensure that the amenities of those living nearby are not detrimentally affected by noise and adverse visual impacts of the storage of tunnel associated materials. Consultation on the original Polytunnel SPD revealed that existing buffer zones are kept free of tunnels; however the space is frequently made use of for a range of other associated activities which can impact adversely upon their residential amenities.

**Planning guideline 10: residential amenity – buffer zones**

**The local planning authority will attach a planning condition ensuring that any 'buffer zones' around polytunnels are permanently kept free from associated storage and are not used for other activities connected with the operation of the polytunnel development.**

- 4.36 In addition to providing 'buffer zones' around the margins of polytunnel sites where they are close to residential properties, it may also be appropriate to impose conditions relating to the maximum acceptable height of the tunnels in sensitive locations. Tunnel heights can vary significantly depending on the crop being grown and the methods of production. To clarify the maximum permitted height would ensure that residential amenities can be protected.

**Planning guideline 11: polytunnel height**

**The local planning authority may attach a planning condition to any grant of planning permission controlling the height of the polytunnel(s) above existing ground level.**

**Noise**

- 4.37 Noise can be created by machinery operations, construction and by wind and rain upon the polythene. It can also be created by an increase in vehicular movements. Those living in close proximity to agricultural polytunnels have indicated that there is an appreciable amount of noise generated by the weather and also by the, often significant, numbers of fruit pickers during the harvesting season. As well as general noise, this can be exacerbated by the use of radios being played at high volume. It is reported that the majority of such noise occurs during the early hours of the morning and later in the evening when pickers arrive and depart the fields.
- 4.38 In order to alleviate noise impacts, Environmental Health legislation is the standard control mechanism, however planning conditions can also be attached to permissions which regulate the times when noise-generating activities can take place. This is particularly relevant if polytunnels are located close to residential properties. In addition to planning conditions, good management can help alleviate potential problems particularly those associated with the playing of music close to

residential properties and should be practised by growers in order to help maintain respectful relationships with those who live close to the tunnels. Growers are therefore encouraged to put in place employment policies that reduce noise disruption to adjacent dwellings.

**Planning guideline 12: residential amenity – noise**

**The local planning authority will refuse planning applications that would result in an undue loss of amenity by way of unacceptable noise to the occupiers of residential properties. All polytunnel developments will be expected to include appropriate measures to mitigate noise impact to an acceptable level.**

**Plastic sheeting**

- 4.39 There are concerns over the impacts of sections of plastic sheeting coming away from the tunnel frames in high winds and blowing onto adjacent properties and into roads. The plastic can become particularly brittle when it has been used over several seasons due to the effects of sunlight and heat.
- 4.40 The majority of plastic sheeting used to cover polytunnels is not yet biodegradable and is therefore difficult to dispose of once it is superfluous to needs. The typical lifespan for the thicker plastics is up to five years. Section 34 of the Environmental Protection Act 1990 imposes a duty of care on persons concerned with handling waste, including keeping waste to a minimum and to sort and store waste safely and securely. Growers in the county do have the option of using a business which collects and recycles agricultural waste plastics.
- 4.41 Conditions may be added to planning permissions to ensure that waste plastic is disposed of promptly once it is no longer required, to avoid nuisance to the local environment and amenities.

**Lighting**

- 4.42 Where artificial lighting either for growing or for security is proposed, this should be kept to the minimum necessary and included within the planning application. There can be adverse impacts on the amenities of those living near to the site as a result of light spillage, which may be mitigated through careful positioning, screening or limitations on brightness.

**Planning guidance 13: external lighting**

**The local planning authority will normally attach a planning condition requiring the submission for approval of full details of all external lighting (if any) to be installed upon the site (including upon the external elevations of the building(s) or polytunnel(s).**

**Negative visual impacts**

- 4.43 This is particularly problematic when the tunnels are in close proximity to domestic curtilages. It is because the tunnels can be substantial in height; highly visually intrusive because of the white, reflective appearance of the plastic and they usually cover large expanses of land that problems are caused for those living close by.

Additionally, the polytunnel frames often remain in place during the winter months over several years and can still have a negative visual impact on the locality.

#### **Planning guideline 14: redundancy of polytunnels**

**The local planning authority will attach a condition to a planning permission stating that:  
'In the event of the polytunnels hereby permitted becoming redundant, they should be removed from the application site within a period of six months, including their supporting structures and any other structures, fixtures and fittings within them.'**

#### **Highway safety and access**

- 4.44 The primary cause for concern amongst residents living close to polytunnels is the increase in the number and frequency of lorry movements on narrow rural lanes both during the harvesting season and when the tunnels are erected or dismantled. Some residents, however, state that a high level of HGV movements occurs during most months of the year. Such lorries, particularly large articulated ones, have caused worries over highway safety, noise (especially early in the morning and later in the evenings), damage to highway surfaces and their verges and small narrow bridges over time and the mud and dust in the roads causing hazardous driving conditions. In addition to lorries, local residents have also noted that when fruit pickers are being employed during harvesting, there is also general increase in the number of cars and buses on rural lanes, used to transport employees to the fields, which again is a cause for concerns over highways safety.
- 4.45 Full consultation should take place with the local highways authority prior to the determination of planning applications to ensure that issues of highway safety are addressed. Where appropriate planning conditions should be imposed as recommended.
- 4.46 Some large-scale developments may require a Transport Assessment/Study. This will be dependent upon existing and anticipated vehicular movements, including heavy or large vehicles. However, in all other instances applications should be accompanied by a written statement (which could be incorporated in the Design and Access Statement) which addresses the amount and type of traffic to be generated and the adequacy of the local highway network to cater with that traffic both in terms of design and capacity. Other matters such as the adequacy of the vehicular means of access(es) to the application site and the adequacy or otherwise of visibility splays should be addressed.

#### **Planning guideline 15: highway safety**

**The applicant will need to 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 of vehicles.**

#### **Public Rights of Way**

- 4.37 The public rights of way service of the Herefordshire Council has a legal duty to assert and protect the rights of the public to the use and enjoyment of any public right of way (PROW) in the county (section 130 Highways Act 1980). In addition, NPPF

paragraph 75 recognises that rights of way are an important recreational facility, which local authorities should protect and enhance. Local rights of way in Herefordshire are part of our heritage and form a major recreational resource. They help boost tourism and contribute to local rural economies, in addition to providing a convenient means of travel. If polytunnels directly affect Public Rights of Way an assessment will be required to accompany the application.

4.38 Polytunnels can have significant impacts on public rights of way since they are often located in fields crossed by these access routes. They can affect both the use and enjoyment of a PROW. Over the last few years the council has received numerous legitimate reports from members of the public describing the impact of polytunnels on their use and enjoyment of public paths in the county. The main problems encountered are:

- the obstruction of the PROW by polytunnel support frames, plastic sheeting, growing beds, wires and ancillary materials such as boxes, irrigation pipes and sundry tools and equipment;
- water run-off leading to waterlogged surfaces;
- the day to day farming operations associated with polytunnel crop production, including heavy and light mechanical vehicles, over spraying with chemicals and water and erecting and removing frames and plastic sheeting;
- damage to the surface of paths caused by vehicles;
- the loss of long distance views from a PROW crossing land covered by tunnels;
- the loss of short distance views available to the public from the PROW crossing land covered by tunnels;
- the impact on views from a distant PROW over land covered by polytunnels;
- litter and general mess associated with a labour intensive operation;
- lack of sufficient toilet and washing facilities for polytunnel workers leading to 'misuse' of adjoining hedges and woodlands;
- noise and dust associated with increased machinery movement in the area; and
- the destruction of natural and historic features such as path surfaces, hedgerows and ditches etc.

4.39 In addition to complying with relevant legislative requirements in relation to public rights of way, applicants should be mindful of the potential impacts of polytunnels on such paths and measures which can be taken to mitigate these.

**Planning guideline 16: public rights of way**

**There shall be no polytunnels erected within 2 metres of the centre line of a public right of way and no polytunnels sited within 3 metres of the centre line of a bridleway. These distances are to be taken as minimum requirement and whilst applications will be considered on their merits, issues such as surface water run-off, safety and impact on views will require greater distances.**

4.40 Where distant views over polytunnels are available from a PROW, the guidance is as follows: consideration should be given to impacts on both the local tourist economy and on those who choose to live and work in Herefordshire, particularly in designated areas such as AONBs and Conservation Areas.

## Water

4.41 Polytunnel development raises implications for surface water management, drainage and pollution, flood risk and biodiversity. The severity of these implications can be dramatically reduced by the implementation of practical, common sense measures that could be implemented through the planning process.

### Flood risk

4.42 There is a risk of increased surface water run-off with the use of polytunnels because of the impermeable layer that plastic sheeting on a large scale can create. This is similar to the surface water run-off problems created in urban areas by roads and hard surfacing etc. However, it is acknowledged that spaces between polytunnels are likely to be grassed down and available for infiltration. Additionally, long-term table top polytunnels have integrated rainwater capture and recycling built into them and will reduce the level of surface water run-off leaving the field. However, where there is an increase in run-off, particularly during periods of heavy rainfall, this can result in a greater risk of localised flooding. Indeed this problem has previously been reported by those living close to existing polytunnel development, who consider that the flooding of nearby roads has become a more frequent problem since the tunnels have been erected.

4.43 The susceptibility of land to flooding is a material consideration when assessing planning applications. This applies to polytunnels just as it does to other forms of development. Both the Government's planning guidance the Core Strategy set out the importance that is attached to the management and reduction of flood risk in the planning process, recognising the uncertainties that are inherent in the prediction of flooding and that flood risk is expected to increase as a result of climate change.

4.44 The Core Strategy recognises that changes to rainfall patterns, land management and land use, combined with more frequent occurrence of extreme weather events, will present increased flood risk, but that its impacts can be avoided or reduced through good planning and land management. Therefore, the susceptibility of land to flooding and surface water management are material considerations when assessing planning applications.

4.45 The Strategic Flood Risk Assessment (2009) (SFRA), aims to ensure that planning policies and development land allocations will not increase the risk of flooding both within developments and in the surrounding area, and to identify and promote measures that will minimise flood risk and/or enhance flood resilience. Development proposals should be located in accordance with the Sequential Test and Exceptions Tests (where appropriate) and have regards to the SFRA for Herefordshire. Policy SD3 provides additional requirements of new developments and the sustainable management of water and water resources. The SFRA is in the process of being updated.

### **Planning guideline 17: fluvial floodplains**

**No polytunnels shall be sited within the fluvial floodplain (i.e. the 1% plus climate change fluvial floodplain extent).**

### **Surface water drainage, water quality and pollution prevention**

4.46 Growers have made significant investment in water management, since water availability is fundamental to the success of soft fruit businesses and therefore

summer rainfall (when tunnel sheets are on) is often captured and recycled to ensure that sufficient water is available for irrigation throughout the growing season. Active water management is required as mitigation to prevent harm to existing watercourses, ecological assets, soil erosion and wherever possible create new benefits. In general terms the slowing up of water before it enters watercourses is a principle to be followed. The use of sustainable drainage systems (SuDS) slows water flow and filters out nutrients and sediment before it enters the watercourses.

4.47 For additional guidance on sustainable drainage systems, Herefordshire Council has produced the *Sustainable Drainage Systems (SuDS) Handbook 2018* and *Planning Applications: Flood Risk and Drainage Checklist 2018*. These will provide additional guidance to potential developers and the handbook makes specific reference to polytunnels.

4.48 Mitigation management measures could include:

- Discharging runoff to soakaways or using drainage basins to cleanse water and disperse run-off via soakaways.
- Using swales to cleanse water and also to disperse a proportion of the run-off via soakaways
- Providing surface water attenuation such as attenuation basins storage tanks, lagoons or farm storage reservoirs.
- Discharging from surface water attenuation at greenfield discharge rate.
- Discharging into existing drainage ditches or constructing them where they do not exist so there is a logical flow into the greater river system.
- Constructing drainage channels/tile drains/French drains etc. as necessary so that surface water run-off from polytunnel development is captured effectively and directed into attenuation lagoons.

4.49 Applicants are advised to carefully consider the location of polytunnels in their proposals in respect to the proximity of all watercourses/water features and incorporate appropriate attenuation measures and pollution prevention. The risk of pollution and detriment to habitat can be minimised by careful siting of structures and management of drainage and irrigation water to minimise soil erosion and nitrification of waters. Applicants are also advised to include allowances for increased rainfall and the effects of climate change in their proposals. All such information will also need to be provided to Herefordshire Council Land Drainage department as a Surface Water Drainage Strategy.

#### **Planning guideline 18: surface water drainage**

**A Flood Risk Assessment will be required for all developments over 1 hectare, which should address surface water run-off. Any such drainage report should consider restricting run-off to the Greenfield rates and detail what attenuation is to take place designed to the 1% with climate change standard to prevent flood risk along with how the polytunnels are designed to prevent run-off and erosion issues and pollution of the water environment.**

#### **Water resources**

4.50 Policy SD3 of the Core Strategy provides guidance on the need to protect the availability and quality of water resources. Water is an essential resource, the pollution of which can have serious effects on drinking water supplies (including private water supplies) and ecology. Inappropriate agricultural activities can be a risk to both surface and groundwater quality and quantity. In particular, groundwater



requires particular protection from both contamination and over-exploitation. The availability of groundwater can be affected by changes in land use such as the increased use of large-scale agricultural polytunnels, which may restrict recharge through increases in impervious surfaces or the diversion of flows. Groundwater forms part of the base flows of watercourses and is vital to ensure the dilution of discharges, maintenance of water supplies and biodiversity. Both water efficiency and water neutrality (betterment) are key elements of the Government's climate change (reduction) agenda.

- 4.51 Policy SD4 of the Core Strategy provides guidance to prospective developers in respect of targets to be achieved for water quality in Herefordshire's rivers. Herefordshire SuDS Handbook provides clarity on the treatment train that is required. There is considerable potential for farmers to capture and store surplus water for future use, thereby reducing the need to abstract water from other sources, while enhancing biodiversity. The water quality of Herefordshire's main rivers and their tributaries is of strategic importance and, in particular, high levels of nutrients along parts of the rivers need to be addressed. This is important to the overall environmental objectives of the Core Strategy.
- 4.52 The Environment Agency, in partnership with Natural England, has developed a Nutrient Management Plan to ensure that the River Wye Special Area of Conservation (SAC) achieves and maintains favourable conditions with respect to phosphate. A Nutrient Management Board was set up in 2015, with the principal objective of identifying and delivering action that result in the achievement of the phosphorous conservation target of the River Wye Special Area of Conservation. The primary mechanism for which is through the delivery of the Nutrient Management Plan.
- 4.53 In some parts of Herefordshire there are issues surrounding 'low flows' of local rivers (information is based on the Environment Agency's Catchment Abstraction Management Strategies (CAMS)), such as the potential loss of flora and fauna and changes in species distribution. Whilst many existing polytunnel businesses and applicants for new polytunnel planning permissions either already use or seek to use trickle irrigation methods, this form of irrigation is currently exempt from requiring an Environment Agency water abstraction licence. However, late in 2017, DEFRA and the Welsh government announced plans to end water abstraction licensing exemptions in England and Wales to allow regulators to manage water more effectively, following a consultation in 2016. Currently, exempt operators, primarily users of trickle irrigation for horticulture, will need to apply for a licence from 1<sup>st</sup> January 2018. It is expected that most, but not all, trickle irrigation users will be offered a licence if the abstraction is not thought to be environmentally unsustainable.
- 4.54 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. This is particularly important in the context of both low flow problem areas and where there may be a potential detrimental impact on the water environment of SSSIs and SACs, as well as Special Protection Areas (SPAs) and Ramsar Sites (such as sedimentation, pollution or adverse impacts on biodiversity). In the case of SAC/SPA/Ramsar sites it may also be necessary for applications to include a Habitats Regulations Assessment (HRA) in line with the EC Habitats Directive (1992).
- 4.55 Planning applications for polytunnels on a significant scale (on sites 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. In cases where small scale polytunnels are not proposing to use water irrigation from low flow rivers or in areas away from SSSIs or SACs then a brief statement of water use and efficiency techniques could suffice. (For more information on Water Resources Studies and Audits see Section 5).

### **Biodiversity**

- 4.56 Since the effects on the biodiversity of an expanse of polytunnels, (including effects of irrigation techniques, soil sterilisation, loss of habitat and chemical usage) are not always apparent; any planning application for polytunnels should include an ecological survey/analysis. This should include plans for the protection and enhancement of the biodiversity of the area and proposals for mitigation techniques, in line with the guidance provided in section 11 of the NPPF. Reference should also be made to Core Strategy policy LD2 – biodiversity and geodiversity. The Core Strategy’s objectives will be delivered through supporting development proposals that add to Herefordshire’s biodiversity. During the plan period, Herefordshire Council will review its Biodiversity Supplementary Planning Guidance utilising, in particular, the principles, opportunities and constraints detailed within the *Building Biodiversity into Herefordshire Council’s Local Development Framework 2009*. Further advice on ecological assessments is provided in Section 5.
- 4.57 The way in which land is reinstated following the cessation of polytunnel use on an area of land is critical in terms of both biodiversity and visual impact. During the assessment of a planning application, the local planning authority will need to be satisfied that there has been detailed consideration of high quality land reinstatement and even improvement of the natural environment. The imposition of a planning condition regarding reinstatement may be deemed necessary if planning permission is granted for the development in question.

<b>Planning guideline 19: ecology</b>
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<b>The local planning authority will need to be satisfied that the habitats of protected species (if any) are protected or mitigated.</b>
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<b>Planning guideline 20: habitat enhancement</b>
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<b>The local planning authority will seek the creation, restoration and enhancement of habitats.</b>
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### **Archaeology**

- 4.58 The development of polytunnels and associated works such as the installation of irrigation systems (reservoirs, pipes etc.) and the creation of access roads and hardstanding areas has the potential for impacting on archaeological deposits and other historic environment interests. It will be important to assess the impact of such proposals in line with policy LD4 – historic environment and heritage assets and, where appropriate, carry out pre-determination investigation or post-determination recording.
- 4.59 Reservoirs are particularly intrusive elements of a polytunnel development in relation to the historic environment due to the scale of the earthmoving operations involved

and the permanency of the created feature. Careful design of reservoirs will be required to mitigate their impact on the landscape and historical features.

- 4.60 Any associated ground works such as surface water drainage and sustainable drainage systems will be expected to follow the requirements of policy LD4 and any associated planning guidance and evidence base documents.

## Section 5: Planning application requirements

- 5.1 In order for a comprehensive planning assessment to be made by the local authority when a planning application is submitted for consideration, it may be necessary for the applicant to supply additional information. This is particularly the case if the application is for large-scale development or where the development site is located in a sensitive area. Pre-application discussions should take place with a development management officer prior to submission to ascertain what additional documentation may be deemed necessary. Applications for planning may fail due to lack of sufficient evidence. Details as to the requirements of a planning application to ensure that it is a valid application can be found on the Council's website.

### **Design and access statements**

- 5.2 Any new development may require an overall design concept to be submitted based on survey and analysis data to establish a framework for the detailed design of the scheme. This will assist in assessing the application against the primary objectives and policies set out in the Core Strategy and relevant Neighbourhood Development Plans. Proposals for larger polytunnel developments should explain the principles that have been adopted for the site and its wider context. An annotated plan should be submitted with a planning application showing the site's relationship with the surrounding pattern and form of land uses and activities, landscape, key characteristics and features.
- 5.3 Relevant adjacent development, particularly if there are existing polytunnels, access to the site, all vehicular and pedestrian movements, natural features including watercourses, hedgerows, trees and any wildlife habitats, views into and out of the site, on-site structures and the form and condition of site boundaries should be addressed.
- 5.4 Where relevant to the proposal, full planning applications for complex or large-scale (for clarification as to what constitutes a large-scale scheme, please contact the development management team for assistance) polytunnel schemes or those which are proposed in sensitive areas should be accompanied by a design statement containing a site appraisal and written explanation. A design statement would typically include the following:
- design principles and design concept;
  - how these are reflected in the layout, scale, visual appearance and landscape;
  - how the design relates to its site and wider area, including how the development has been planned to minimise the effects on the environment; and
  - a summary of the above where this would be of value in public consultation.
- 5.5 Transportation matters should be addressed, including detail of the amount of traffic generated (both hourly and daily) and its type together with an assessment of the adequacy of the local highway network to cater with the traffic generated in terms of both design and capacity. Means of vehicular access(es) to the site, together with the proposed visibility splays will need to be provided.

### **Landscape or visual impact assessments**

- 5.6 All applicants will be expected to fully address the landscape impacts of a polytunnel proposal, both individually and in the context of other similar developments within visual proximity of the proposal site.
- 5.7 A landscape impact assessment will be necessary for the vast majority of planning applications since it is the potential harm to the landscape of an area which is one of the key planning considerations in such schemes.
- 5.8 A number of landscape and townscape character assessments have been prepared and supported by a Historic Landscape Characterisation and completed conservation area appraisals. The *Landscape Character Assessment Supplementary Planning Guidance 2009 (SPD)* will be reviewed during the plan period. The SPD will build upon the detailed evidence base documentation; including Natural England's Character Areas, as well as the *Urban Fringe Sensitivity Analysis 2010*, *Rapid Townscape Assessments (various)*, *Green Infrastructure Strategy 2010* and other local studies covering architectural and historic environments. In conjunction with the above, relevant Areas of Outstanding Natural Beauty Management Plans and associated guidance also provide more place-specific guidance which should inform development proposals from the outset.

### **Social impact assessments**

- 5.9 The NPPF seeks to support prosperous rural economies, including the growth, expansion and diversification of agricultural and other land-based businesses, so long as the development proposed is sustainable. The potentially large scale of polytunnel developments mean that they can have an adverse impact of the public's enjoyment and use of the landscape. The importance to health and wellbeing that the interaction with the countryside has on people should be assessed, particularly where the site will be seen from public rights of way and popular viewpoints. Proposals should take account of features both within and adjacent to the site, since integration and connection to the surrounding countryside and green infrastructure, together with long term management are key considerations.
- 5.10 In addition, the Core Strategy supports rural tourism and recognises the valuable contribution in terms of social value and quality of life that local landscapes and buildings can bring to the local population and visitors alike.

### **Economic assessments**

- 5.11 Economic arguments as discussed in section 4 above are often technical ones and in order for the local planning authority to assess their validity and importance adequately, they must be set out in robust manner which is fully evidenced. To simply include in the information accompanying a planning application a set of broad statements will not be acceptable.
- 5.12 In instances where the polytunnels proposed are on a small scale, a simple business case may suffice. It is important to clarify requirements with a development management officer prior to the submission of a planning application. The more economic information that can be provided, the better the understanding of an applicant's business venture and associated business case, and its likely impact of the local economy. Appendix 1 provides some helpful background questions which an applicant is encouraged to answer:
- 5.13 A comprehensive economic impact assessment or appraisal should be submitted alongside proposals for large-scale polytunnel schemes. Again, it is essential to

discuss the proposal with a development management officer prior to submission of an application.

- 5.14 In respect of the potential impacts of a large-scale polytunnel development in the AONB, the applicant may find it appropriate to submit a balance sheet analysis of the economic issues and the wider relationship between agriculture and other interests. This would establish the relative contribution of each to the local economy.
- 5.15 Appendix 2 sets out an example of the components of a balance sheet analysis, which could be used to outline how such a study might be structured<sup>4</sup>.
- 5.16 Since it is likely that such in depth economic analyses are likely to be very costly, it may be useful for large-scale growers who anticipate that they will be required to submit such detailed planning applications in the future to work together to produce an economic assessment analysis, thereby reducing costs and avoiding unnecessary duplication of work. This could be particularly relevant in Herefordshire where there are a number of large-scale soft fruit producers in one county. Where a proposal site does not fall within a designated landscape area, it may still be necessary to undertake a similar balance sheet analysis, since the high quality of landscapes throughout the county is one of its primary assets that is afforded specific protection through the Core Strategy.

#### **Flood risk assessments**

- 5.17 In areas particularly prone to flooding and in respect of planning applications for larger polytunnel developments (sites of 1 hectare or more), the Environment Agency will be consulted. A Flood Risk Assessment may be necessary in accordance with the requirements of the NPPF, paragraph 103. Where such a Flood Risk Assessment is deemed necessary, it should be appropriate to the scale and nature of the development and should consider:
- (a) flood risk and surface water run-off implications;
  - (b) any increase risk arising elsewhere;
  - (c) measures proposed to deal with these risks and effects, e.g. restricting run-off to the Greenfield rates;
  - (d) explaining what attenuation measures are in place designed to the 1% with climate change standard to prevent flood risk; and
  - (e) how the polytunnels are designed to prevent run-off and erosion issues.

#### **Water resources studies/audits**

- 5.18 Planning applications for polytunnels on a significant scale (sites of 1 hectare or more) should 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. The Water Audit could include the identification of a number of water efficiency measures such as, for example;
- rainwater harvesting from water run-off from the polytunnels and/or re-circulation programmes, and
  - the use of buffer zones around polytunnels to help prevent chemical leaching into streams and nearby watercourses.
- 5.19 This Water Audit will be looked at in detail by the Environment Agency, as part of the application for approval.

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<sup>4</sup> Source: An Investigation into Poly tunnel Development in AONBs and National Parks – The Countryside Agency, January 2006, Entec UK Limited

- 5.20 In cases where small scale polytunnels, not proposing to use water irrigation from low flow rivers or in areas away from SSSIs or SACs, a brief statement of water use and efficiency techniques could suffice.

#### **Ecological appraisals/nature conservation assessments**

- 5.21 A wildlife habitat survey carried out by a suitably qualified and experienced ecologist and at an appropriate time of year will be required where a proposal affects a site which is known to have, or is suspected to have, any species protected under the Wildlife and Countryside Act 1981, Conservation of Habitats and Species Regulations 2010 or the Protection of Badgers Act 1992. This will include badgers, bats, certain reptiles and breeding birds. Should habitats or species of significance be identified, further assessment will be required to determine the impact of the development on the wildlife and proposed mitigation to minimise the impact. Applications for the development in the countryside which affect sensitive areas which must be accompanied by ecological assessments and include proposals for long-term maintenance and management.
- 5.22 The following list should enable potential applicants to satisfy the expected level of detail required as part of a tunnel application:
- A records centre search and 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 ecologist is recommended to ensure clarity in regard of survey and assessment requirements. A Natural England license 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 Specific 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. 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 alternative 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 the NPPF, section 11 proposals that will enhance, restore or add to biodiversity interests will be welcomed. This could include provision of bird and bat boxes/tubes as well as the planting of native species within landscaping schemes and restoration of habitats.
- The retention of existing trees, hedgerows and other biodiversity features on the site should be sought. A tree survey in accordance with BS5837:2012 Trees in relation to Construction may be required. Pre-application discussion with the county ecologists is recommended to ensure clarity in regard of survey and assessment requirements.
- Opportunities for creation of BAP habitats where appropriate.
- All proposals will require compliance with Herefordshire Council's Core Strategy policies for biodiversity and geodiversity (SS6 and LD2) and relevant government guidance.

### **Statement of community consultation**

5.23 Since many proposals for large-scale polytunnel development are likely to produce significant public interest or controversy and can often affect the amenities of nearby residents, where this is likely to be the case, it is advised that the applicant enter into early discussions with Parish Councils and local people in order to discuss any potential problems and solutions before planning permission is sought. Sometimes this will also involve important consultees such as the Environment Agency, Natural England and the council's traffic manager. Planning officers will, at this early stage, advise applicants if their proposals are likely to be considered 'significant' and therefore need to be the subject of specific community involvement measures. This advice is contained formally within the Council's *Statement of Community Involvement*.

5.24 At the application stage, a statement of community consultation should be submitted to the local planning authority detailing how the applicant has approached this and what the outcomes were. This will assist the passage of the application through the planning process.

### **Other information**

5.25 In addition to the aforementioned documents, there may be a variety of other studies or assessments that may need to accompany certain planning applications depending on their scale and location. The council's development management officers will be able to discuss such requirements with potential applicants on a case-by-case basis. It is therefore important for potential developers to engage in pre-application discussions. The following lists sets out the majority of possible additional information that may be required:

- travel plans
- legal agreements
- sustainability appraisal
- listed building or conservation area appraisal
- archaeological assessment
- environmental impact assessment (EIA)
- noise assessment
- public rights of way assessment
- transport assessments



## Section 6: Planning application guidance

### Temporary planning permissions

- 6.1 Where polytunnels are required for the production of ground grown crops to be rotated on a predetermined regular basis, for example every three years, then it may be reasonable for a time limited planning permission to be granted. Indeed, granting permission for three or four years would provide some certainty to those living or working nearby that the tunnels would not be a permanent feature of the landscape.
- 6.2 However, the lifespan of a crop varies according to crop type and variety. Some strawberries may be re-established after three years, whereas raspberries and cherries will remain in situ for much longer. Therefore any rotation periods must take into account the needs of the crop. To grant permissions limited to two or three years would therefore not be appropriate to the needs of growers, particularly as future crop breeding will improve the productive life of many plant types. In addition, it may not be economically viable for polytunnels and associated infrastructure to be developed for only a short time, then subsequently removed. When an application for planning permission is received, it should be made clear by the applicant that if the tunnels are only required in certain positions for a limited period, then an appropriate time limited planning permission may be considered.

### Pre-application advice

- 6.3 Herefordshire Council offers professional, objective advice and information for planning and listed building applications. The pre-planning professional advice service is for anyone wanting to carry out development, such as building work or engineering work or to change the use of land or a building.
- 6.4 A planning officer or building conservation officer can advise on all aspects of the planning process relating to your application, including: whether your proposal is likely to gain planning permission or listed building consent; what the key planning policy issues are; and what you would need to submit with your application.
- 6.5 The cost of this service depends on the type of proposed planning permission submission. You can find more information on Herefordshire Council's pre-planning advice fees page at:  
[https://www.herefordshire.gov.uk/info/200142/planning\\_services/66/get\\_help\\_making\\_a\\_planning\\_application/5](https://www.herefordshire.gov.uk/info/200142/planning_services/66/get_help_making_a_planning_application/5)
- 6.6 Please note that the pre-application advice service does not include any consultation with external organisations that may well be statutory consultees in the event that a planning application is submitted. This may have a bearing on the outcome of any future application and applicants are advised to make contact with relevant organisations, some of whom administer their own pre-application advice service. Further advice of relevant organisations can be offered on an informal, without prejudice basis, by the case officer.
- 6.7 It would assist both potential applicants and the local planning authority if a tiered planning approach is taken to large scale polytunnel developments. This would highlight any significant issues at an early stage in the process and identify the likely viability of an application and the required additional information. This would reduce the likelihood of a significantly adverse impact case coming to the application stage,

thus reducing workload pressures within the local planning authority and unnecessary expenditure on the part of the applicant.

- 6.8 The following steps outline the most appropriate way to approach polytunnel development proposals that require planning permission:
1. Pre-application assessment and informal discussion to highlight significant issues and guide what additional information will be required.
  2. A checklist of what information is required for the planning application based on the initial assessment drawn up by the case office in conjunction with the applicant.
- 6.9 It should be made clear during pre-application discussions that although such an assessment will highlight significant issues relating to the proposal it might be necessary to carry out further assessment work to inform the determination, depending on the scale, location and nature of the proposal.
- Whole farm plans**
- 6.10 Whilst applicants have the right to apply for planning permission on the basis of each individual polytunnel or each individual field, it is the view of the local planning authority that it would be preferable for applications relating to large agricultural holdings to be presented as a 'whole farm' application. Such applications ensure a holistic approach rather than a piecemeal approach and give certainty to both the applicant to plan the business and the local community as to the longer-term environmental impacts.
- 6.11 The most appropriate way to approach this matter is for applicants to engage with the local planning authority in pre-application discussions to establish the planning constraints. The applicants would then need to engage with officers of the council, the local community and other bodies (e.g. Environment Agency) to address the identified planning constraints. A sieve-map analysis can then be created whereby one can attempt to agree where upon the holding polytunnels should not be sited (if anywhere). This would normally then leave less sensitive area(s) where polytunnels could potentially be sited. However, this does not mean that all such areas should be covered due to the issue of cumulative landscape impact highlighted earlier within this document.
- 6.12 It is acknowledged that whole farm plans are not useful for all polytunnel development proposals, however, they can be useful on farms where crop rotation methods are employed. Usually if planning permission is granted on a field by field basis, then each time the polytunnels (plastic and frames etc.) are removed, the grower will have to re-apply for planning permission to re-erect them in a few years' time. However, if a whole farm plan planning permission is granted then removal and re-erection of tunnels will not require repeat planning permissions so long as the land in question was appropriately zoned as part of the original permission. This approach is helpful to both nearby homeowners and to growers since it will provide both certainty as to where polytunnel are to be erected and give the grower the opportunity to formulate longer term business plans for the farm holding.

## Appendix 1: economic criteria – business case

### Polytunnel business case – economic criteria

<b>1.</b>	<b>Estimated acreage?</b>
<b>2.</b> 2a. 2b. 2c.	<b>Estimated tonnage to be grown?</b> Likely market destinations? Use of local hauliers? Source of packaging?
<b>3.</b>	<b>Gross value added – estimated market value of crop?</b>
<b>4.</b> 4a. 4b.	<b>Approximate numbers of people to be employed?</b> Hourly rate x hours per week x number of weeks? Weekend working?
<b>5.</b>	<b>Fulltime/seasonal worker split?</b>
<b>6.</b> 6a. 6b. 6c. 6d. 6e.	<b>Workers information</b> Provide an estimate of age group targeted Provide an estimate of numbers of employees who are single, accompanied by partner and/or with children Likely accommodation provision and location? Nearest shops? Likely use of public transport?
<b>7.</b> 7a. 7b. 7c.	<b>Will any other supporting infrastructure need to be built?</b> If so, what? Likely estimated cost? How would you identify a contractor for the work?
<b>8.</b>	<b>What would the land be used for if not under polytunnels?</b>
<b>9.</b>	<b>Likely impact on existing business, if project not proceeded with?</b>

## Appendix 2: economic balance sheet analysis

### Suggested components of a balance sheet analysis of the impact of polytunnels on a protected landscape

**Aim:**

To establish the costs and benefits associated with large-scale polytunnel development in a protected landscape.

**Objectives:**

1. to determine the contribution of agriculture and tourism to a locality
2. to determine the economic benefits for agriculture attributable to polytunnel use
3. to determine the tourism uplift attributable to the presence of a particular landscape without polytunnels

**Method:**

1. Literature review
2. Establish economic baseline for both tourism and agriculture (specifically horticulture and polytunnels) – ONS, local authority data etc.
3. Survey tourist authorities/boards/local authority tourism departments applicable to AONBs
4. Perform a 'balance sheet' analysis using figures identified, interpolating where appropriate.

**Key study considerations:**

## Agriculture:

1. Economic uplift attributable to polytunnels – production, labour force etc.
2. National vs. local benefit
3. Growth potential
4. Contribution of polytunnels to local rural economy

## Leisure and tourism:

1. Actual and potential leisure and tourism uplift attributable to AONB designation. Establish the baseline position: GDP, trends, number of tourists, number of employees, role in rural economies and visitor surveys of reasons for visits.
2. Is the attractiveness of the AONB based purely on visual quality? Landscape may be just one factor. There are wider considerations such as: season/weather, choice (competing locations) and state of the economy.
3. Indicators of the impacts of polytunnel development in AONBs:
  - number of visitors
  - number of return bookings recorded by B&Bs, hotels, guest houses etc.
  - people active in local tourist economy
  - day trip vs. overnight stays
4. Growth potential
5. Market niches

### Appendix 3: Former UDP policies (superseded by Core Strategy)

S1	sustainable development
S2	development requirements
S4	employment
S6	transport
S7	natural and historic heritage
DR1	design
DR2	land use and activity
DR4	environment
DR6	water resources
DR7	flood risk
DR13	noise
E12	farm diversification
E13	agricultural and forestry
T6	walking
T8	road hierarchy
LA1	Areas of Outstanding Natural Beauty
LA2	landscape character and areas least resilient to change
LA3	setting of settlements
LA4	protection of historic parks and gardens
LA5	protection of trees, woodlands and hedgerows
LA6	landscaping schemes
NC1	biodiversity and development
NC2	sites of international importance
NC3	sites of national importance
NC4	sites of local importance
NC5	European and nationally protected species
NC6	Biodiversity Action Plan priority habitats and species
NC8	habitat creation, restoration and enhancement
NC9	management of features of the landscape
HBA4	setting of listed buildings
ARCH1 – 6	archaeology
RST9	Herefordshire and Gloucestershire Canal