



Bourne Valley Associates Ltd

**Planning Statement
for the
Erection of polytunnels for strawberry
production**

For

S & A Property Limited

At

**Springfield Nursery, Sutton Road, Llandow,
Cowbridge, South Glamorgan,
Wales CF71 7PA**

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Issue 1



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1. Introduction and need for the development

This Planning Statement supports an application to the Vale of Glamorgan Council for pre-application advice relating to the erection of polytunnels for strawberry growing at Springfield Nurseries, Sutton Road, Llandow, Cowbridge, South Glamorgan, Wales, CF71 7PA. The application is submitted by Bourne Valley Associates, acting as Agents on behalf of Mr Peter Judge of S & A Property Ltd. There will also be water storage and drainage measures associated with the polytunnels, but their details still need to be finalised, and will be set out fully in the full application, upon submission.

Pre-application advice has been sought and received from the Vale of Glamorgan Council, and the present proposals follow that advice.

This application is following procedures for “major” proposals and seeking comments through the pre-submission consultation process. Necessary modifications will be made to enhance the proposal or to provide clearer information. The level of information currently provided is adequate to satisfy requirements for this stage. Therefore, further details, especially in relation to water management and landscape measures, will be provided with the final, full, application.

It has previously been recognised by the local planning authority that the principle of structures associated with agriculture is acceptable. Following pre-application advice, a planning application was submitted in 2015 for a new glasshouse, a packing house and other facilities including accommodation pods and permission was granted under reference 2015/00422/FUL, subject to conditions. Some of the conditions were discharged, and a relaxation of some of the other conditions was granted under the subsequent permission 2016/00128/FUL, to allow the placing of accommodation pods for workers to be placed on the site. These pods have since been placed on site in accordance with the latter consent, and serve the workers of the previously constructed glasshouses at the site.

Changes and uncertainty in the market and in the cost of construction of glasshouses have led to a decision by S&A not to invest in construction of a glasshouse at Springfield Nurseries at this time.

However, S&A remains committed to continuing to provide fresh Welsh strawberries for the Welsh market. Indeed, it has held constructive discussions with the Welsh Government not only to assure it of the desire for continued investment but, more significantly, developing with them a strategy for Welsh production of soft fruit using a number of small production units in the context of issues for Welsh Agriculture likely to be brought about by Brexit. Moreover, as part of its supply strategy to Welsh consumers, it is necessary to supplement the production from the existing glasshouse at Springfield Nurseries, given that production under glass focusses on the “shoulder months” of early Spring and Autumn, as has previously been stated in earlier submissions. Glasshouses do not provide the optimum environment during the peak demand period during late Spring and Summer, and a cooler environment that can be created under polytunnels is better suited for production during that period. Previously, S&A’s supply at that time has been satisfied through production in Herefordshire and at other English sites. However, it is both more commercially advantageous to satisfy the Welsh market by fruit from the Llandow site, and also more sustainable in transport terms.



Therefore, at least in the short term, S&A is keen to take advantage of the established site at Springfield Nurseries, with its high light levels, by erecting polytunnels on the site that would have been occupied by the glasshouse.

We are seeking pre-application advice from the local planning authority to explore the following:

- What information would need to be submitted with a planning application?
- What procedures would need to be followed to ensure compliance with The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 in relation to pre-application consultation on a “major” developments? It is accepted that the size of the site to be covered with polytunnels would be greater than 1 hectare in area, and therefore would be subject to the Order. In particular, which bodies and individuals should, in this instance, be consulted? What is likely to be the implication of following the Order on timescale?
- Ideally, polytunnels would retain their plastic covers on throughout the year, to avoid the inefficiencies and potential for wear and tear in removing the polythene. Under this management regime, what would be the likely requirements in respect of mitigation for disturbance of Great Crested Newts and their habitat, and on drainage and flood management, which would have been significant capital measures associated with the implementation of the glasshouse construction, as required by previously imposed conditions?
- Against which policies would a planning application for polytunnels be judged? In particular, are there relevant supplementary design documents that should be addressed?

Please note that we have specifically requested, and paid for, a site meeting to discuss proposals with officers, prior to the issue of written advice.

Elements of 2015 permission that have been implemented

The development permitted in 2015 has not been implemented, other than the provision of the accommodation pods and welfare buildings. These structures were necessary to accommodate those seasonal pickers employed at the existing glasshouse, given the difficulties of recruiting workers locally. A total of 22 double accommodation pods, together with associated welfare buildings, was approved, as it was assumed that all would be used by the expanded area of glasshouses. In fact only 14 of the pods (and most welfare buildings) have been placed on site, in accordance with the approved plans. If the current proposals for polytunnels are approved, then the final 8 double pods will be placed on the existing hardstanding at the site, together with the balance of the welfare buildings. Therefore, no further consents will be required for those works only.

Elements of 2015 permission that will not be implemented

Both the economic context and the political context have altered dramatically since the additional glasshouses received permission. There is a clear demand for strawberries for much of the year, but glasshouses have a limitation during much of the summer months, when demand is at its greatest, in that they become too hot, even with temperature controls, for strawberry plants to thrive.



Therefore, they only attain strong production during spring and autumn. Thus, taken in isolation, the Springfield Nurseries site would not be profitable. Accordingly, there needs to be transformational approach to the site at Springfield in order to make it economically sustainable.

In addition, the volume of strawberry production at Springfield, even under the greater area of glasshouse, would not warrant a packing house on site, bearing in mind that there are currently no other S&A soft fruit sites in South Wales. Therefore, the packing house proposals will not be implemented. As is discussed below, it is hoped that the pattern of soft fruit production in Wales will alter significantly over the next few years, and it is possible that a packing house might be needed in the future, but it is not currently part of the development plan for the site.

The 2015 proposals would have included a framework of underground water storage cells beneath the new glasshouses. While accepting the need to manage surface water run-off (and this subject is addressed fully in Section 7), those underground structures would have required significant earthworks and would have proved very expensive. Moreover, subsequent consideration of water management throughout the whole site has shown that water can potentially be addressed through expansion of existing infrastructure at the site, and the demand from strawberry plants for water is less than previously anticipated so, though some storage will still be required, it will be less than thought earlier, and greater use of sustainable drainage systems can be attained.

Recent changes in demand and threats to supply

The demand for strawberries continues to rise. According to Defra, consumption of strawberries has risen by 150% between 1996 and 2015, supported by perceived health benefits and improved availability. UK soft fruit purchases now account for 22% of all consumer fruit purchases. Volumes have continued to climb, with the market value of soft fruit grown in the UK worth £465 million in 2016 and it was estimated to be worth £670 million in 2018.

British Summer Fruits predict 101,000 tonnes of supermarket grade British Strawberries to be grown and sold in 2019. This mass is +21% versus 2018. Based on a total UK population of 66m, it equates to UK market consumption of 1.54kg per capita per year. In the last 52 weeks UK retailers have sold a total of 132,000 tonnes of strawberries, suggesting an import volume of c.31,000 tonnes per year. If and when the UK leaves the European Union, it may be more difficult and more expensive to import those non-UK strawberries.

An increasing trend in food and drink consumption over recent years has been the rise in importance of provenance, that is knowing where food was derived. It has coincided with a desire for more sustainable food, not only in the form of production, but also in using products that have travelled the shortest distance. So, almost half of British consumers are prepared to pay more for British food and groceries, while only 34% of consumers prefer retailers to source from the lowest cost suppliers, even if they are outside the UK.

The area of soft fruit grown in the UK has increased by 9% since 2014. Four crops account for 87% of the total area of soft fruit grown. Strawberries take the largest share at 38% of the total area. Wales currently only has 1% of the total soft fruit growing area in the UK, despite making up 8.5% of the UK's land mass.



Wales represents c.4.73% of the UK population. Based on the average UK consumption per head, there is demand for around 5,000 tonnes of British grown strawberries per year in Wales. Based on only having 1% of the total UK growing space, we can estimate volume production of c.1,000 tonnes, leaving a deficit in Wales of c.4000 tonnes per year. At present, Wales has been doing little to overcome this deficit, despite the rise in demand for locally-derived products, and despite having many natural attributes which favour the sector, just 0.08% of all agricultural land in Wales is currently used for horticulture.

Figure 1 shows how the horticultural land in Wales is currently (2015) utilised. Well under one third of that horticultural land is used or could be used for strawberry production, Orchards and small fruits do account for a significantly higher proportion of the horticultural land used in Wales compared to the rest of the UK – 21% on a UK level compared to 27% in Wales.

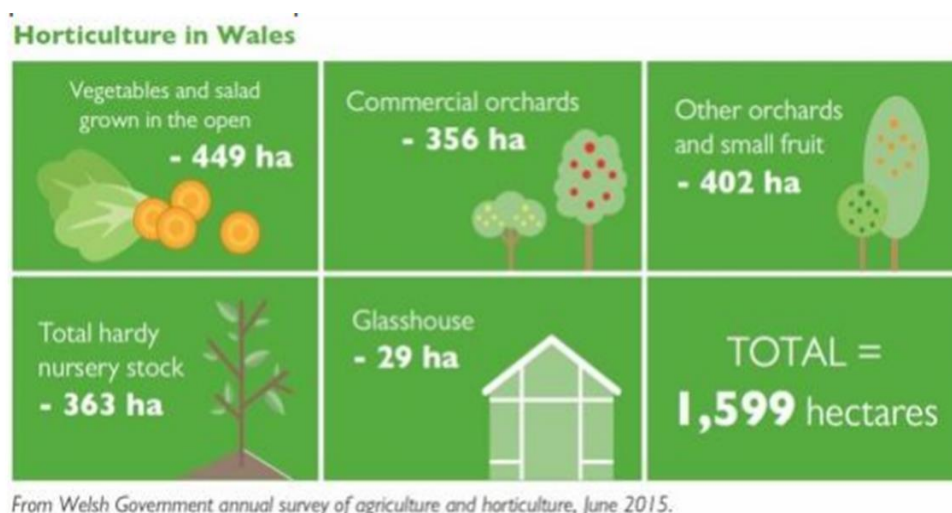


Figure 1 Land under horticulture in Wales

‘The Value of Welshness’ report, which is based on a survey undertaken by Wavehill in 2017 of 1,200 household shoppers across Wales, Scotland, and England (with an oversample in Wales), found that promoting a clear Welsh identity on products often adds value to brands. The survey found that, in Wales, 80% of consumers prefer to buy Welsh products, 74% want more Welsh food and drink in shops, and 44% would be prepared to pay more for produce if they knew it was Welsh. These changing consumer behaviours accounts, at least in part, for several trends including increased demand for local, seasonal fruit and vegetables and growth in food tourism.

This desire to buy Welsh cannot currently be satisfied in strawberries. At the beginning and end of the season availability of Welsh strawberries in Wales is closest to demand. However, there are significant periods where demand for Welsh strawberries cannot be met and will currently have to be met using fruit from other parts of the UK and abroad.

The comparison of Welsh strawberry supply and demand is illustrated in Figure 2. The figures have been drawn from previous demand and supply and applying predicted changes. The higher, green figure shows the demand by the Welsh population, and the lower, purple, figure is the forecast



supply from Welsh sources. It is clear that, during the peak summer months, the deficit of Welsh-grown strawberries is marked.

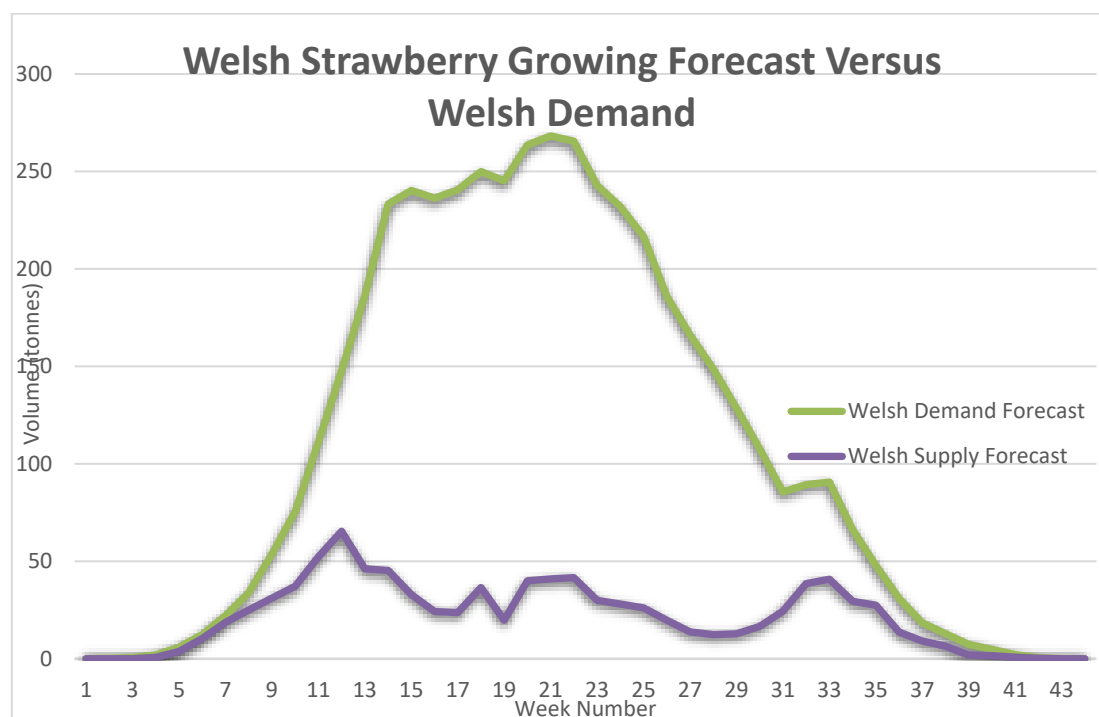


Figure 2 – Demand and supply of Welsh strawberries throughout the year

S&A is convinced that this deficit can be addressed in Wales. The total annual production of strawberries from the site, from both the glasshouses and the proposed polytunnels at Springfield will be some 450 tonnes. The total production of strawberries at the site would be about 35 tonnes at the peak week. This weight will contribute significantly to satisfy the overall Welsh strawberry demand. There is considerable support from UK supermarkets to focus its soft fruit sales of UK grown fruit, as they recognise only too well consumer trends.

Nonetheless, even with the proposed polytunnels, there will be a deficit of Welsh strawberries. This fact is clearly known to the Welsh government, which has been exploring means of increasing “home-grown” soft fruit production, and has approached S&A to explore measures to increase production within Wales, recognising the forward-thinking and scientific reputation the company has, exemplified by Springfield becoming a research and development centre. Details of the Welsh Government’s proposals to enhance home food and drink production can be found at the website of Food and Drink Wales¹. It states:

“Our proposed mission is: to develop a thriving food and drink industry through working collaboratively with the sector to achieve the following strategic aims:

¹ See <https://businesswales.gov.wales/foodanddrink/>



- *To grow our businesses' scale, value, and productivity, through targeted investment, support, innovation and co-operative activity throughout supply chains, and by creating strong and diverse routes to UK and export markets.*
- *To benefit our people and society by providing attractive careers and fair work, committed to developing the skills of the workforce, using resources sustainably, and encouraging businesses to play a part in addressing public health and poverty.*
- *To create and communicate a global reputation for Wales as a Food Nation by showcasing our sector through Taste Wales, developing and living our sustainable brand values, widely adopting high production and accreditation standards, and celebrating businesses' successes."*

Welsh brands are now being actively marketed through Taste Wales, and it is proposed that strawberries from Springfield will also join that marketing regime. There is clear reference in the aims to developing skills, and the training facility at the barn on the site will facilitate training.

There has thus been advanced discussion between the Welsh Government and S&A on a soft fruit production strategy, taking account of the fact that it is only in SE Wales that sunlight and temperature levels are adequate to make soft fruit production viable, even under cover. The emerging strategy is to encourage the development of a "micro-growing forum" comprising some 30 – 40 sites. This would be a new production model whereby small areas of polytunnels would be erected at these sites to allow existing farm enterprises to diversify with limited impact on the environment. Many small farm units in Wales are economically marginal, but could become profitable through the diversification, thus maintaining or increasing agricultural employment in areas where there are limited job opportunities.

S&A would be subsidised by the Welsh Government to provide not only research into whether sites might be appropriate for soft fruit production, but also research and development to ensure growing practices suited to the Welsh climate and environment are introduced, and providing training for existing or future farm staff at the new sites. New facilities would be needed for training. It is proposed that these should be provided through the restoration and conversion of the former agricultural building at Ysgubor-newydd, Grove Road. That building is on land held by S&A (see location plan 00570-00, Sheet 01) but outside the scope of this present application. It is proposed to be converted to provide seminar rooms, toilets and a kitchenette. However, those proposals, which would be the subject of a site licence to maintain roosting habitat for bats at the site, are not part of this current application. It is anticipated that a subsequent application will be submitted, ensuring that the building's use is tied to the activities at the nurseries, as the training activities are integral to the economic model for the site.

Documentary evidence from Food and Drink Wales confirming the discussions between S&A and them regarding the strategy for soft fruit production in Wales can be provided, if required.

So, the development of the polytunnels at Springfield would have both direct and indirect positive impacts on both Welsh strawberry production and horticultural employment, and it is justified at both a local and national level.



2. Site Context

2.1 The Client

S&A Group owns Springfield Nurseries in Llandow, Cowbridge. The Company is a market leader specialising in growing, packing, importing and exporting soft fruits (including strawberries, raspberries and blueberries) and asparagus, both grown in the UK and abroad. Annually, it grows in excess of 10,000 tonnes of soft fruit which is sold in outlets including (but not limited to) Sainsbury, Marks and Spencer, Tesco, Asda, Morrisons, Aldi and Lidl. It operates with modern technology, and is both highly efficient and environmentally conscious and strives to minimise its environmental impact through effective crop management and rotation, monitoring and forecasting. It also ensures that finished products are not overly-packaged and actively recycles where possible. The company was started in the late 1990s, and has since expanded to many sites in England and Wales, though its principal production sites are in Herefordshire and Kent, as well as in South Wales. As stated in the Introduction, S&A has a well-documented commitment to satisfying the Welsh strawberry market from its Llandow site, on a year-round basis, and to reducing its dependence on its English operations.

2.2 The site and its context

The site at Springfield Nurseries was previously a plant nursery, specialising in chrysanthemum production, and then a fruit farm, with a history of large glasshouses for over 50 years. It was purchased by S&A Property Ltd in February 2013. The site is located on the northern side of Sutton Road, approximately 1km from Llandow. Figure 1 shows the site (arrowed) in its local context. The existing glasshouses are shaded. The proposed location for the polytunnels lies to the North of the westerly glasshouse and West of the eastern one. Drawing 00570-00, Sheet 01 is submitted formally as the location plan. The application comprises two fields: the southern one is that on which planning permission for the additional glasshouse was granted. The other field, to the North, has been acquired by S&A since planning permission for the glasshouse was granted, and is thus also outlined in red on the location plan. The approximate area of the two fields together is just less than 2.6ha, and the two polytunnels structures would occupy almost the whole of the area, but there would nonetheless be land set aside for planting and ecological mitigation measures.

The village of Llandow lies about a kilometre to the North-West, but is set in a valley and has no visual connection with the site, which is set on a flat-topped ridge. The Cardiff to Bridgend railway line, passing through Barry, is also at a lower level, so that passengers do not have any views of the site.

The surrounding area is both rural and commercial, with Llandow Business Park being on the southern side of Sutton Road. Sutton Road has been the subject of recent employment expansion and thus transport generation. The closest major road is the Llantwit Major Road (B4270), approximately 1km to the east, and classified as a lorry route through this part of the Vale of Glamorgan. Access to the B4270 is good, and no transport issues have been experienced because of the operation of the site.

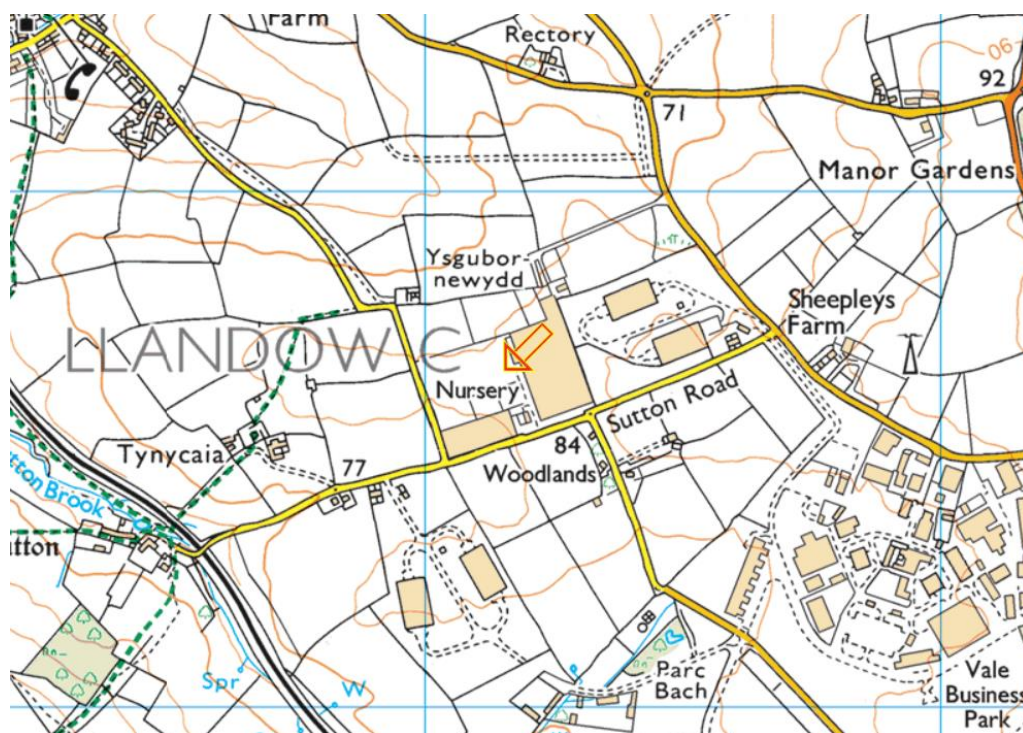


Figure 3 - Springfield Nurseries site context

The whole site covers 5.79ha (14.3 acres) and currently supports two glasshouses, both of which produce strawberries. The present layout is shown on the location plan, Drawing 00570-00, Sheet 01. The larger glasshouse is located on the eastern edge of the site, running North to South, and covers 16,962m² (approx. 98.6m x 173m). The second glasshouse is located at the South-West corner of the site, running from east to west, and covers 7,046m² (approx. 52.3m x 134.7m). They will remain under the proposals and will, together with the polytunnels, provide a long growing season, which is essential for the profitable use of the site.

A residential bungalow, providing accommodation for the site manager, sits at the centre of the southern edge, adjacent to the entrance. An office and welfare building lie in the centre of the site. The heating for the glasshouses is provided by an oil-fired boiler, and the vent for the boiler is a tall structure at the northern boundary to the site. The site also includes a pond for rainwater attenuation. It has previously been used for irrigation purposes, and is thus described as a reservoir throughout this statement, though there is no abstraction of water from it today. As is explained in Section 6, the reservoir has great significance as the breeding site for Great Crested Newts. The reservoir is to remain and is not affected by the current proposals.

The aerial photograph, in Figure 4, provides a snapshot of the site, and is representative, as it was taken in June 2018. It shows the proximity of large former aircraft hangars, the legacy of World War 2. The two existing glasshouses are clearly evident. The two fields proposed for the polytunnels are outlined in red. The application site is outlined in red, and would exclude the position of the accommodation pods, many of which have already been provided, and which can be seen as a line alongside the eastern boundary.



It will be recalled that the eastern part of the proposed application site was once occupied by a glasshouse, which was later demolished. The rubble from that former glasshouse has been left as a mound within the application site, and is visible as a grey, oval feature in the photograph. The mound is unsightly, but does act as a habitat for newts, as is explained in Section 6.

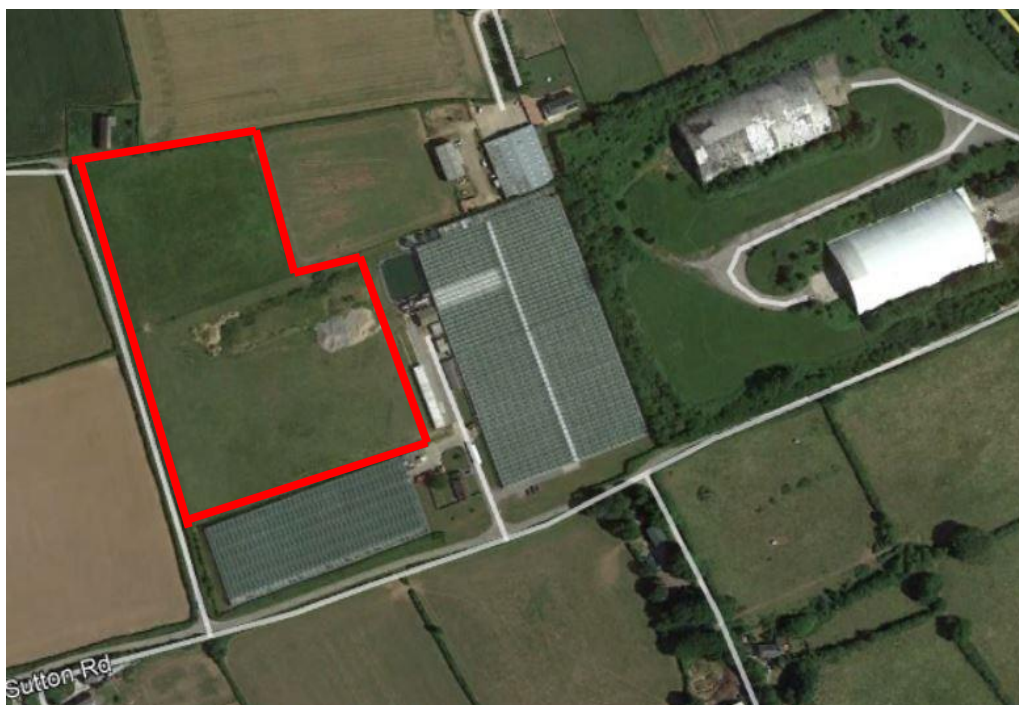


Figure 4 - Aerial photograph of proposed application site

2.3 Employment

S&A employs 4 full-time staff at the site on a year-round basis. This number is increased to 26 during the seasons when the glasshouse is in heavy production and there is a need for pickers. A thorough advertising campaign (detailed in the previous planning applications) undertaken locally failed to attract adequate numbers of staff for maintenance and picking. Therefore, during the picking season, pickers were transported in daily from England. This situation was addressed through the provision of the accommodation pods. The need for providing good quality accommodation for pickers on site has been highlighted by the likely departure of the UK from the European Union (EU), and thus the potential loss of migrant workers from the EU's eastern member states, who have contributed significantly beneficially to the UK horticultural industry over recent years.

The provision of the accommodation pods at the site presently on the site is in accordance with the earlier permission. Further pods can be added to the site, also in accordance with that permission. It would cover the projected additional 8 full-time staff who would be employed at the site during the growing season. There will be a short overlap of production, when fruit will be picked from both the glasshouses and polytunnels, and if production is high during that period, then workers will be brought in by bus from sites in Herefordshire, but only as a temporary measure.



Thus, there will be a direct advantage to the local economy through the proposal, as the additional full-time workers will use local shops, pubs, cafes and other facilities, spending money there. As is explained in this statement, there will also be other jobs maintained or created through the establishment of new soft fruit growing sites at other sites in South Wales.

3. *Layout and Design*

Given the advantages of the site, especially the high sunlight levels it receives, the development concept is to achieve as much land under cover as possible within the two fields. Orientation of polytunnels is normally North-South, in order to achieve common growth rates and fruit maturity along their length. That degree of constancy cannot be achieved if the structures are aligned East-West, where the northern side of each line would receive less sunlight and heat. Therefore, the polytunnels would generally follow the existing North-South alignment of the fields, as shown in the submitted layout drawing (00570-00, Sheet 02) and only off-set a little to the South-East.

Thus, the total area of polytunnels cover is 2.49ha. There is, as is described in this report, and shown in the layout plan, adequate room around the polytunnels to enable maintenance. Indeed, the gap between the polytunnels and the hedge to the West is slightly wider than that from the existing southern glasshouse to the hedge.

In the area between the polytunnels and field boundaries there is also room to provide additional tree and shrub planting and to set out new hibernaculae, formed from the material currently within the spoil mound at the site. These details will be submitted with the full application for the site, but will include native species found in the area.²

The polytunnels will not be individual structures, but rather would be inter-connected structures. The scale leads to easier management, including temperature and humidity control, as well as movement of staff and machinery. There will be two blocks of polytunnels: one will occupy the southerly of the two presently unoccupied fields, on land that is generally flat but requires some levelling. The northern block will run down the slope to the North.

The southern end would have a width slightly shorter than that of the adjacent greenhouse to the south, at 128m. It would be almost square in its footprint, with the “run” some 122m long. However, only 122m would be the full width. The northern field has a smaller block of tunnels. Its width would be 96m. The shape would not be regular, but would reflect the slight narrowing of the field towards the East. Thus, it is 104m on its western side and 93m on its eastern side

Details of the proposed polytunnels are provided in the drawings prepared by Grove Engineering, who design similar structures for the horticultural industry. Each of the tunnels would be 8m wide, so allowing easy access for specialised machinery. The height of each tunnel would be 4.5m maximum, with the minimum height being a little below 2m, but much of the width has a greater height, to allow for maximum use by pickers. (See the section drawing prepared by Grove Engineering)

² Ash is a common tree in the local landscape, but it will not be planted at the site, because of the outbreak of Ash Die-back Disease.



The frame would be covered with low-glare plastic³ and it would not be removed annually, unless it were damaged.

4. Impact on landscape character and views

4.1 Introduction

The principle of development at the site has been considered previously through the determination of the planning application for glasshouse development (2015/00422/FUL). The officer's report on that previous application stated:

"An assessment of the impact on landscape character and views has been included in a comprehensive Planning Statement accompanying the planning application and contends that the visual impact of the new, large buildings on the site will be remarkably low, because:

Vehicular traffic will only catch fleeting views of the site, especially as the limited width of road will warrant concentration on driving;

The presence of the existing glasshouses on the western part of the site will screen near views by both pedestrians and certainly car users;

The treatment of the southern elevation of the packing shed will be painted as a recessive colour, so that it will be perceived by viewers as having less bulk/mass as dominant paint colours. It is suggested that the paint colour will be Flake Blue BS 182B29 which will have a limited degree of visibility against the sky. (Note the applicant is content to accept a condition relating to details of materials being submitted, including colour)

It is accepted that the packing building will be visible from pedestrians using Sutton Road. Therefore, the perception of massing has been reduced by designing the packing shed to its minimal height.

In light of the above conclusions, an officer assessment of the development during two site visits and also consultation with the Council's Landscape Architect, who does not raise any issues with regards visual impact, the proposed packing building, albeit large, will be viewed in the context of an existing nursery operation and surrounding commercial development and is therefore considered to be acceptable with regards its visual impact."

Thus, there were no over-riding issues with the previous proposals inasmuch as their impact on landscape character and views. This conclusion was drawn by officers despite the size of the proposed packing house, which would have had a ridge height of 9.2m, and its proximity to Sutton Road, and it is clear from the above abstract that the principal concern was not related to the impact of the additional glasshouses. The packhouse has not been built, and is no longer part of the development plans for the Nurseries Site.

³ Light grey polythene – detailed specification will be provided when the planning application is submitted.



It should also be recognised that the polytunnels, at a height of 4m, will be much lower than either the existing or the previously proposed glasshouses. The latter would have been 5.8m to the eaves and 6.74m to the ridges.

The footprint of the polytunnels will be different from that previously considered for the proposed glasshouses and packing house. That is because additional land has been purchased by S&A, to include a field to the North of the previous application, and leading down towards the disused barn. The field boundary is at the break of slope, and the northern boundary of the additional field is some 2.5m lower. Although the polytunnels will follow that slope down, there is nonetheless the potential for the structures to be seen, to a greater degree, from the North. Therefore, the significance of the impact of this change has been assessed during Autumn 2019. The impact on local, closer views and amenity was also revisited to assess the effect of the change in proposals.

Another significant difference between this application and that made in 2015 is that the material used will be plastic and not glass. Unless it is treated, large structures made of glass will produce glare in sunshine for part of the day. In some instances, glare can be irritating to nearby residents, though there are few close to the nurseries site. The glare can also make structures more apparent than normal, with an inordinate impact on landscape character. The plastic used for the polytunnels is not clear, but opaque. While it would help fruit production for plastic to be as transparent as possible, some concessions have to be made to enhance sheet production and longevity⁴. Therefore, the risk of glare is significantly reduced⁵, and the structures would appear less clear in open views than glasshouses do.

4.2 Site Levels

A topographical survey of the site has been undertaken, demonstrating that the site is generally flat, rising from 78.2m AOD (Above Ordnance Datum) in the south west, up to 83.9m AOD in the east. Contours and spot heights are shown on the Existing Site Plan on Drawing 00570-00, Sheet 01⁶. The site falls slightly towards the South-West, so that some levelling in that part of the site will be required. The material for levelling will be taken from within the site. No material will be removed from the site. As shown on the site layout (Drawing 00570-00, Sheet 2) the polytunnels will have a break, and that roughly coincide with present field boundaries. So, the polytunnels in the southern field will be approximately level, while those in the northern field will fall in levels northwards.

The details of levelling will be provided with the application, but note:

- The maximum height of the field (excluding the mound) will not be exceeded;

⁴ In Section 1, we explain that the cost of replacing plastic sheeting (and its non-sustainable nature) mean that the plastic sheeting is left on the frames throughout the year for many years.

⁵ Polytunnels for strawberry production are now a feature of the Herefordshire landscape. Our review of officers' reports for planning applications for polytunnel erection in that county suggests that landscape officers do not regard glare as a material issue.

⁶ The topographical survey for the site, undertaken by P.Stubington Land Surveys Limited, is also submitted with this application. Although dated November 2013, the plan remains representative, though the hardstanding with the accommodation pods is not shown.



- There will be no sub-soil excavations of the site. We therefore consider that there will not be any material archaeological impact, but we are seeking comments from the Glamorgan and Gwent Archaeological Trust.

There is presently a linear mound of spoil and topsoil, some 4m higher than the fields, created at the demolition of the previous glasshouse, towards the site's northern boundary. It will be removed during site construction, but all material will be retained on the site, and either used to level the site or be utilised to provide newt hibernaculae. (See Section 6)

4.3 Hard Landscaping

It is important to note that there will not be any additional hard surfaces associated with this application, other than the very small area around the three new water storage tanks. Accordingly, there will not be any additional urban features introduced.

There is no need to provide concrete bases to the polytunnels, which would have been the case with glasshouses. There will be exposed earth within the polytunnels, allowing vegetation to recolonise. While there will be maintenance tracks around the polytunnels, it is hoped that these can remain untreated, so the green, open appearance will be maintained.

4.4 Impact on nearby views

Despite its elevated position, there are very limited local views of the site. Views from the East and South are impeded because of roadside hedges and large buildings, including those of the Llandow Industrial Estate and hangars that are vestiges of the previous airfield. The western boundary of the site is marked by a narrow lane leading to Llandow, but the roadside hedges are so high, and the lane slightly sunken, so that views for both car drivers/passengers and pedestrians are not possible. In any event, this is a seldom used highway.

Figure 5 shows a view of that lane, close to its junction with Sutton Road, and looking North. It can be seen that the land rises to a point opposite the break in slope on the site. The hedge is about 2.5m tall, and prevents any views of the adjacent glasshouse, despite it being much taller than the polytunnels would be. It is therefore reasonable to conclude that the polytunnels would not be seen from the lane. However, it is proposed to manage the height of the hedge (currently undertaken for S&A) at about an additional 0.5m taller than at present. Therefore, future views will be even more restricted.



Figure 5 - Lane to Llandow, looking North

Figure 6 shows the existing glasshouse adjacent to Sutton Road, with the lane down to Llandow in the foreground. It makes clear the relative height of the structure (supported by additional material close to the junction) is considerable. It is logical that the polytunnels would not be seen from Sutton road and from the South.



Figure 6 - Existing glasshouse, viewed from Sutton Road

Although the two former hangars to the south of Sutton Road, now occupied by Harris Pye, are at roughly the same altitude as the application site, limited views of the site can be attained because of the roadside hedges in between.

There are no sensitive receptors or public viewpoints close to the site's northern boundary. Figure 7 shows a view North East from a point adjacent to the reservoir on the site. It shows the adjacent riding stables, held by separate private owners. The top of their house can be seen in the centre of the image. No views of the application site can thus be gained from that dwelling. The adjacent fields (part of which are shown) are grazed by sheep and not actively used as part of the stables.



Figure 7 - View NE towards riding stables

4.5 Impact on long distance views

No long-distance views are afforded from South or East, by virtue of a happy combination of topography, vegetation and large buildings. There are no public rights of way close to the site from which views can be gained. The nearest right of way is to the West of the site. The public footpath L6/7/1 runs from the ancient settlement of Sutton through Tynycia to reach the Llandow road just to the North West of the site. However, no views can be achieved because it is at a slightly lower elevation than the site, and the roadside hedges afford screening, as described above.

The nearest residential settlement to the site is Llandow, which is in a valley about a kilometre to the North West. However, the hillside in between is over 30m in height difference, and that, together with the heavily enclosed landscape between, prevents any views.

The topography North of the site is rolling, so that the land is folded into a series of ridges and valleys that generally are aligned West-East. The A48 follows one of these ridges between Cowbridge and Bridgend. No public viewpoints can be gained in between. Figure 8 shows a photograph from a layby on A48 at Crack Hill, which is slightly west of north from the site, about 4.5km west of Cowbridge towards Bridgend.



Figure 8 -View from Crack Hill (A48)

The viewpoint is so distant, at about 4 kilometres (about 2 miles) that, while the aircraft hangars, which have considerable mass and height, can just be perceived on the skyline, the present glasshouses are not clearly visible, and it is not considered that the proposed polytunnels would be visible to any significant extent, in the view. The impact on receptors, even those parked in the layby, and not driving at speed on A48, is thus considered to be negligible. If one magnifies the above photograph, it is just possible to discern the existing boiler exhaust on the site against trees behind it. That chimney is taller than any of the new buildings would be. It should be noted that even the existing hangars close to the site, and certainly much taller, cannot readily be seen in this view. Although adjacent to the A48, the viewpoint is not likely to be one relevant to visual impact, as most views would be fleeting, from passing vehicles.

Figure 8 was taken in 2015, but the impact from A48 has been revisited in 2019. Figures 5 and 6 also show views from Crack Hill, North of Colwinston, at a point of 90m AOD, which is about a high a view of the site that can be gained, though there is no public viewpoint there. Figure 9 approximates to the view seen by the naked eye. The ridge on which the nurseries stand forms the skyline. The hangars at the former airfield can be seen in the centre of the image, and the tower at the airfield is just discernible. Neither the glasshouses nor the boiler exhaust can be identified. Figure 10 is taken on the same day and from the same point, but shows a 10x magnification of part of the panorama. While the hangars are, the present glasshouses are not visible.



Figure 9 - 2019 view from Crack Hill, looking South



Figure 10 - As Figure 9, but with 10X magnification



One can reasonably conclude that, even from a high point, views from the North are distant and therefore the additional impact would be negligible, especially as the opaque plastic would provide a colour that would appear recessive either against the adjacent vegetation or against the sky.

Consideration has been given to the impact on views from Colwinston, even though this was not an issue with the glasshouse proposal. It is about 3km from the site, and is about 20m lower than Crack Hill, so that, especially given ranks of hedgerows and woodland in between, the impact on views is also considered to be negligible.

The changes in views from individual properties to the West of the site have been examined. It should be noted that the polytunnels will probably not be seen over the roadside hedge – given they will be lower than the glasshouses, even when the land is raised somewhat. The extent of the views from that direction would be greater, as the polytunnels will extend further North than the glasshouses. However, even if the polytunnels were to be seen, they would be against the backcloth of the accommodation pods and existing eastern glasshouse, so that a worst-case assessment of impact on visual amenity for residents would be low negative.

4.6 Landscape character

Good practice in landscape assessment also includes consideration of impacts on the landscape character of the area. We have followed that practice, paying heed to information on landscape character areas identified by Vale of Glamorgan Council⁷

The site lies within Landscape Character Area (LCA) 8 – Lias Plateau, which occupies much of the central and western part of the district. The introductory description of that LCA makes special reference to nearby activities:

“In the centre of the area is a discrete LCA relating to the Llandow Trading Estate (see LCA 9) which has been separated due to it being such an incongruous element within the surrounding rural landscape.”

Indeed, the Springfield Nurseries site lies immediately adjacent to the Llandow Trading Estate LCA, which includes not only that estate, but also most of the land that previously lay within RAF Llandow.

Accordingly, this statement takes account of the text relating to both LCA 8 and 9.

LCA 8 is described as *“open, rolling plateau with scattered farmsteads.....with a mixture of medium and large field sizes set in a matrix of hedgerows with hedgerow trees”*. We would not entirely agree with this description inasmuch as it relates to the immediate area. Although long distance views can be afforded between (generally East-West) ridges, the area near the application site has a fair degree of enclosure provided by hedgerows. A number of key policy and management issues are set

⁷ See Designation of Landscape Character Areas, Final Report, Vale of Glamorgan Council, August 2008. Note that the report was reviewed in preparing the emerging version of the local Development Plan. It was found still to be relevant and has been submitted as a background paper in its entirety.



out, of which only “*integration of new developments into the settlement edge landscape*” is relevant to this proposal.

LCA 9 is described as having “*a mixture of buildings of varying quality and character and this is complemented by a variable landscape structure.*” We agree with this summary, and consider that while the site was never a part of the airfield, the long presence of tall and bulky buildings, albeit for agriculture and not for military/storage/office uses, is more characteristic of LCA 9 and not LCA8.

The key issues for LCA 9 include the need to “*ensure any further developments seek to raise the quality of the built forms associated with the area.*” We consider that the existing glasshouses on the site are intrinsically not unsightly and are typical of productive agricultural areas, and that the proposed polytunnels, although extensive, will also not be unsightly, and their impact will be limited by other structures (including the glasshouses) and by vegetation.

It is surprising that the LCA makes no reference to the impact on character of the height and bulk of the former airfield buildings, now to be conserved because of their cultural heritage value. It should be noted that;

- the proposed structures would not have a significant impact on the setting of the aircraft hangars and other structures of cultural heritage value;
- long-distance views of the site will only be gained from the North, but the new structures will be negligible in the wider landscape and not diminish the role of hangars as landmarks. As stated earlier, the polytunnels will be much lower than the existing glasshouses.

Therefore, we consider that the impact on landscape character would be negligible.

4.7 Soft Landscaping

The open parts of the site are currently left to rough grass land and used for sheep grazing, and heavily mown close to the entrance. The perimeter of the nurseries site to the East and South is bordered by a recent, but well-established, species-poor hedgerow, and post and wire fence on either side of the entrance. These will be retained and managed as part of the application.

Within the site is a large mound of spoil left over from previous development on the site. This is an unsightly feature (see Figure 10) when viewed within the site, but its ecological value to newts is recognised. So, while the mound will be moved, there will be care taken to utilise the material to recreate hibernaculae (see Section 6) as well as helping to level the site. No material will be removed from the site, thus avoiding impact of additional lorries on local roads.



Figure 2 - Rubble mound within the application site

Our conclusion is that there is no need to provide additional planting in order to screen the site from views or to enhance the working environment of the site. However, it is proposed that some limited peripheral tree and shrub planting is undertaken. The details are yet to be finalised, but the focus of planting will be on the northern and western boundaries. This planting would achieve two objectives:

- It would enhance biodiversity. It would be closely associated with new hiberniculae created from relocated pieces of rubble from the spoil heap. The species proposed (Pedunculate Oak, supported by shrubs, such as Holly and Guelder Rose) will complement the woody species found in the perimeter hedges;
- It would enhance the overall landscape character by adding to the numbers of hedgerow trees that form the typical character of the area.

4.8 Summary of Landscape Impact

In his pre-application advice for this proposal, the planning officer wrote: *“At this stage I would suggest a similar level of visual assessment to that submitted previously being provided. However, should the finish and colour of the proposal be considered to require a Landscape and Visual Assessment, this would be requested during any formal submission.”*

Thus, a similar methodology has been proposed to that associated with the glasshouse proposal. As the finish and colour of the plastic are considered to be recessive and produce no glare, we do not consider that a more formal landscape assessment should be required. Indeed, our contention is



that the materials are less likely to give rise to visual issues than the glass that would have been utilised in the glasshouses, and no formal assessment was required for them.

The pre-application advice also commented: “The site already contains a large array of glasshouses and the proposals indicate that the proposed polytunnels would extend further towards the north of the site. These structures would be seen principally in the context of the existing glass houses, as opposed to a significant further visual intrusion into the wider landscape.”

That statement is a good starting point for assessment of the possible additional impacts of the polytunnels. Our studies have concluded that, while the polytunnels would indeed extend further North, their moderate visual scale and their recessive colouration would mean that views and landscape character would suffer only a negligible adverse impact. This conclusion has been drawn bearing in mind the very limited number of receptors either nearby or distantly.

Indeed, upon maturity of the additional, complementary tree and shrub planting, the landscape character of the area may well be enhanced through these comprehensive proposals.

5. Transport

Planning permission was granted under 2015/00422/FUL without any conditions related to transport and access. There are significant differences in terms of traffic generation associated with the two proposals.

First, the earlier application included new accommodation pods at the site. Most of these have now been placed on site without undue impact on the road system. The balance of those pods previously permitted can be implemented without further consents. The pods have allowed the practice of bussing staff to work at the glasshouses, often from Herefordshire, to almost completely cease.

Second, the packing house approved under the 2015 application will not be implemented. This change will not, in itself, lead to a reduction in traffic movements, but the manoeuvres of vehicles on site continue to be as at present, so that the impact of vehicle noise on amenity will continue to be negligible.

Third, the pattern of strawberry production will alter to reflect the longer growing season utilised at the site. As has been explained, crop production under glass during summer months is reduced because of high temperatures, so that traffic generation related to transport of picked strawberries falls at that time. The opaque nature of the polytunnel plastic and the absence of any heating means that fruit can grow and mature under their cover even at the hottest periods, so there will be transport of strawberries from the site during high summer. Thus, the extended growing season will mean strawberries will be transported from the site from March until November. The polytunnels are, in effect, a replacement for the glasshouses for much of the summer, and will only supplement the glasshouse production for a short period at the start and end of summer, and it is only in those periods that traffic movements of picked strawberries will increase, and then only a small figure, as set out below.

No new access or parking provision will be required.



The table below provides a comparison in traffic generation between the present and predicted situation. The figures take account of the placement of most of the pods on the site.

Type	Present Yearly Totals	Predicted yearly total with proposed development	Present weekly total movements during peak periods	Predicted weekly total movements during extended picking periods
Postal Deliveries	312	312	6	6
Full Time Staff Vehicle	935	1150	28	50
Seasonal Staff Vehicle (including buses)	70	70	10	7 (buses only – no workers living on site will have cars. Limited bus use may be necessary ⁸)
Oil/CO2 Delivery	55	55	2	2
Produce Leaving Site (HGVs)	99	150	3	8
Waste Bin Removal	14	14	1	1
Pest Control	13	13	1	1
Courier Deliveries	84	100	3	4
Hygiene Service	13	13	1	1
Cleaner	104	104	2	2
Service Engineer	5	10	1	1
TOTAL	1919	1991	57	77

wfPresent and Predicted Traffic Generation, Springfield Nurseries

⁸ in periods of overlap of glass and polytunnel production, for about 60 days/10 weeks at 3 buses per week



It should be noted that the above figures reflect the number of visits to the site. We recognise that the number of traffic movements would be twice, those figures, to reflect both arrival at and departure from the site. Nonetheless, the absolute number of traffic movements is limited, compared with the volume of traffic on the local transport network. The annual average daily flow on the B4268, North of Nash, is about 6000, so the generation figures from the site are modest and acceptable.

In considering those traffic numbers, the following should be borne in mind:

- Unlike most traffic generators, there will not be a material number of traffic movements at either the morning or evening peak, especially because most staff live at the site;
- The number of heavy vehicles will be limited. As stated above, there will only be very few buses for short periods of the year. At the very most, the number of visits each week to pick up picked strawberries in refrigerated articulated lorries would be 4, or 8 movements. This figure is immaterial compared with the number of heavy vehicles visiting the nearby Llandow industrial estates.

Therefore, the traffic impact of the proposed development is considered to be limited and acceptable, with no on-site or off-site highway enhancements warranted.

6. Ecology

A survey of the previous application site was undertaken because of the known proximity of Great Crested Newts (GCNs) nearby. This survey determined that the grassland had the potential for GCN habitat and GCNs were also found in the existing pond at the site. Accordingly, although permission was granted, it was to be the subject of mitigation measures to be agreed by the council and also by Natural Resources Wales (NRW), who would also need to ensure that a site licence for the construction and mitigation works was granted and implemented. Thus, a site management plan was prepared and agreed, but the works were not implemented and the site licence not obtained.

The consultant ecologists previously engaged to undertake the site survey and to prepare a management strategy, including mitigation measures, has been involved with the evolution of the revised proposals.

A further Phase 1 habitat survey was undertaken to cover this present larger site in 2017, and its results are set out in the report submitted with this application. Natural Resources Wales has confirmed that the 2017 survey data is still current and that no further surveys are necessary to support this application. Figure 12 shows the habitat map for the site. That plan includes the site of the former barn, which is not included in this application, but is related to it in that future training facilities will be promoted there, once the building is converted. The plan shows that the site is covered by semi-improved grassland, though the rubble mound is clearly indicated.

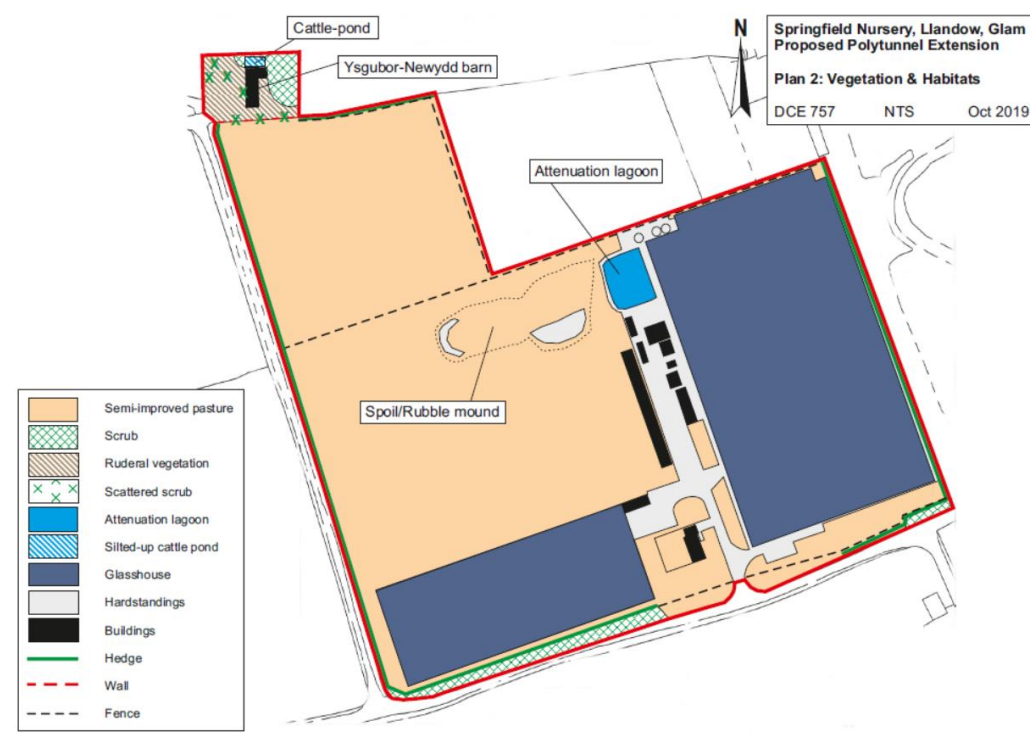


Figure 12- Habitats at the site (courtesy of David Clements Associates)

The ecological report states that the rubble mound “*was found to support significant numbers of sheltering and foraging GCN in terrestrial phase and is also considered likely to be used as a winter hibernaculum by this species.*” That feature would be removed under these proposals, and so the impact would be considerable and needs to be addressed both by mitigation measures and through a management plan to be agreed not only through this planning application, but also through a derogation Site Licence that would need to be issued by Natural Resources Wales. The licence application will be submitted if planning permission is granted and once all material conditions are discharged, to satisfy the requirements of the “Habitats Regulations” relating to European Protected Species such as GCN.

As made clear in this statement, the reservoir, which is the focal point for GCN breeding, is not physically affected by this proposal and lies outside the application boundary. However, the two fields are known to be used for foraging by newts and common reptile species. Therefore, the management plan submitted with this application explains how the numbers of these species present on the site will be minimised at the time the ground works are undertaken and the polytunnels erected. Prior to approval of the management plan, it is prudent to reduce the attraction of the fields to these species by reducing the height of the grass sward. During 2019, this has been achieved both by cutting hay in the summer and subsequent grazing by sheep, as is shown in Figure 13, a photograph taken in November 2019.



Figure 13 - Sheep grazing the application site, November 2019

Nonetheless, it is proposed to fence the land and to trap and translocate any protected species found at the site during Spring 2020, when many newts will be at breeding sites (including the site reservoir) so their numbers should be low. Moreover, at that time, the newts will have emerged from hibernation, so it will be possible to dismantle the mound without undue harm to newts.

After the polytunnels have come into operation, they will be open to access by the newts, which would be able to feed on slugs and other animals that would be found at the site. Therefore, the loss of the habitat is not as marked as under the glasshouse proposals. Thus, the principal loss of habitat is that of the mound, which contains *hibernaculae*, voids in the rubble which offer protection to newts during winter. Therefore, the mitigation measures proposed with this application include the recreation of hibernaculae at locations on the perimeter of the application site. These will be associated with proposed tree and shrub planting, and will be made from rubble removed from the mound and reset in accordance with requirements of the site licence and the comments of the local authority ecologist.

Detailed proposals will be drawn up and submitted with the application, but not yet prepared.

Account has been taken of the pre-application advice on ecology provided by officers from the local planning authority. We are content that the suite of measures proposed will not only safeguard the



long-term future of existing habitats and ecological value of the site, especially its protected species, but also enhance the biodiversity of the site through enhancement measures.

7. *Water Management, Drainage and Flood Risk Assessment*

The application site lies outside any flood risk zones. However, one of the benefits of the public consultation in September 2014 is that our attention was drawn to flood events in Llandow⁹. Members of the public believed that flooding was caused by run-off and not by direct rises in levels of the Llandow Brook. Therefore, we are aware of the sensitivity of potential surface water run-off, and the previous planning permission was subject to a condition requiring a full water management strategy for the site, to provide a comprehensive approach to flood risk, water requirements of the site operations and the provision of GCN mitigation measures. That strategy was not completed and thus the condition was not discharged.

As yet, the water requirements of the site (to include both the existing glasshouses and the polytunnels) has not been assessed, and that work will continue up to the submission of the planning application, so that a reasoned assessment of the need for drainage measures will be provided. S&A is once again committed to a comprehensive approach to water management, but it has to be affordable to ensure the capital investment is worthwhile. Indeed, the prototype water storage measures for the glasshouses included underground tanks. These would have been expensive to construct, especially because of the cost of extracting and removing limestone rock, which lies close to the surface. Moreover, a reconsideration of the water budget suggests that the water requirements of the strawberry plants are less than had been assumed.

Accordingly, in terms of water requirements, the principal source of water will continue to be site's borehole, and the reservoir at the site will not be used for any water abstraction, so that there would be no negative impacts on the newts which use the pond for breeding. The borehole fills with water during winter rains, and thus excess water (there being minimal plant growth at that time) can be stored. It is thus proposed to construct three additional water tanks along the site's northern boundary. The site plan shows their approximate location. The details will be provided with the full planning application, but they will not be any taller than the two tanks already on that boundary. Therefore, the additional landscape impact they would bring is considered to be minimal.

The principal issue to be addressed, in terms of water management, is thus the impact of rainwater run-off. Although there will be no impermeable base to the polytunnels^[2], which will have a base dressing of coir, the plastic itself will be impermeable, so that rain will be directed into the channels within the polytunnel structure, and then towards the ends of the structure. The water reaching that point will then need to be managed in such a way that there is no increased risk to flooding either at the site or off-site by the use of some form of storage, be it an attenuation tank or pond for a positive discharge off site, or a soakaway or infiltration basin/swale should ground conditions be favourable. The rate at which water leaves the site should not increase above its present rate for various storm return periods – the so-called greenfield site run-off rate.

⁹ There was severe flooding in December 2012. See, for example, <http://www.youtube.com/watch?v=tf-9stEvkbY> and

^[2] As opposed to glasshouses, which need a concrete base.



That greenfield runoff rate depends upon individual site characteristics obtained from current data available in a database which we will be able to determine via a small desktop study. Geotechnical tests are also being undertaken to check how quickly water is absorbed into the earth – its infiltration rate, to determine if infiltration (soakaways) will be viable. The results of these tests will help the design of the drainage measures to be provided but, given, that the base rock is porous limestone, it is hoped that the rate will be rapid, so that the need for additional means to manage the water will be minimal although we will still need to provide a sufficient quantity of storage to cater for extreme storm events. The investigations at the site will also check the effectiveness of some existing drainage infrastructure at the site, dealing with water derived from the mound of rubble. All this work will be undertaken by competent geotechnical field engineers working to a hydrological consultant.

S&A recently obtained planning permission in Herefordshire for polytunnel coverage all year round on sites at Marden and Brierley. Previously the restriction was that only 50% of the polytunnel floorspace could remain covered all year round. As mentioned previously, it is now not commercially viable to lift the sheeting from polytunnels every winter, and the sheets themselves have a longer operational “life”. The local planning authority accepted a technical report that demonstrated that changing to all polytunnels remaining on site throughout the year did not lead to an unacceptable increase in flood risk. The report associated with that site can be provided, if required, and similar investigations are being followed on this occasion.

We recognise, given the size of the proposal, that not only will the proposals require planning permission, but also, under new legislation from 2019, consent from A Sustainable Drainage Approving Body (SAB)¹⁰. So, we will submit a separate application, which will demonstrate compliance with the statutory standards, follow a set of principles in the design of the system and satisfy the standards in relation to runoff destination, hydraulic control, water quality, amenity, biodiversity, construction, operation and maintenance.

During the preparation of both the planning and SAB applications, our team will work in concert with the flood management staff at the Vale of Glamorgan Council, to achieve a mutually acceptable scheme that would utilise Sustainable Drainage Systems to minimise flood risk and, if possible, to enhance habitats and biodiversity. The submitted scheme will set out full drainage details to seek to avoid subsequent discharge of related pre-commencement planning conditions.

8. Noise

The pre-application advice suggested that a noise survey should be provided with any planning application. There is, however, no good reason for such a survey and assessment to take place. Indeed, no noise assessment was provided with the 2015 application and it was not requested by the local planning authority.

¹⁰ This requirement has been confirmed by the Vale of Glamorgan council’s legal team.



It is important to recognise there are no close residential neighbours. In any event, construction works will not be intrusive to local amenity, as there will be no percussive activity. During the operational phase, there will be no additional noise received off-site, as the activities of the pickers will be acoustically contained within the polytunnels.

9. *Pre-submission consultation*

This application has evolved through advice from relevant bodies. It has built upon the pre-application advice from the local planning authority prior to the 2015 application. The consultation event that we held in Llandow prior to the submission of the 2015 application, and thus before changes requiring consultant with relevant organisations prior to submission, is testament not only to S&A's desire to involve the local community, but also to respond creatively to responses received during consultation. We also ensured that most information in respect of ecology was obtained through close liaison with the council's ecologist and with NRW before submission of that earlier application.

The change of proposal from glasshouses to polytunnels activated a new pre-application advice request and this application has borne that advice in mind. This development is a "major" application which has been subject to pre-application consultation. This process has been undertaken in line with best practice and follows due procedure, including:

- A 28 day consultation process;
- Site notices placed on site and adjoining landowners notified;
- Provision of appropriate information to specialist consultees and to local councillors and Llandow Community Council. The information provided is adequate to enable validation of a planning application. Further detailed information will be provided with the full planning application;
- Plans and documents have been provided for public viewing at Llandow Village Hall, and an open evening to allow informed discussion of the proposals will take place;
- A summary of procedures followed, comments raised and our response to them will be set out with the submitted application.

9. *Accordance with Planning Policy*

In making a planning application, we will set out a full analysis of relevant planning policy, with a clear explanation of why we consider the development accords with policy or, if it does not, why it is a justifiable exception to policy or how issues can be addressed by appropriate mitigation measures.

In reviewing planning policy, we have taken account of the policy documents, and specific policies set out in the pre-application advice received from the Vale of Glamorgan Council.

9.1 *National Policy*

National planning policy in the form of Planning Policy Wales (Edition 10, 2018) (PPW) is of relevance to the determination of this application.



The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales. The concept of sustainable development is central to this document.

This sets out the Welsh Assembly Government's land use planning policies and is supplemented by a series of Technical Advice Notes (TANs). It is arranged with each chapter dealing with a different topic.

At Section 1.7, the document states: *"Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated."* So, if we can show that the development would be sustainable, and there are no demonstrate contrary "material considerations", the proposals should be approved. We have therefore ensured that there is enough information provided with this application to show that the development would be sustainable. It is, of course, worth noting that the previous application for larger glasshouses was permitted, and central policy matters have not since altered.

The document describes sustainable development as being *"the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals."* The emphasis has changed from previous versions of PPW to make reference to action to achieve goals. Those goals are set out in the Well-being of Future Generations (Wales) Act 2015, and not expanded upon in PPW, other than in the following diagram:



This development would accord with the goals in that:

- It would bring prosperity through jobs not only at Springfield, but at other farms throughout Wales;
- The production of strawberries in Wales and a reduced reliance on imported soft fruit would make Wales more resilient, as would the measures we would take to minimise flood risk;



- There is potential for soft fruit consumption to increase, if Welsh strawberries were more readily available, so making Welsh people healthier;
- Equal opportunities would be available for employment at the site, as wages more than meet requirements;
- Encouragement of farmers into soft fruit production would stabilise populations in rural areas, and make them more cohesive;
- The introduction of workers from other countries will bring vibrancy into the local area, and the strengthening of Welsh farms through maintenance of jobs would help retain Welsh culture in rural areas;
- The profile of Wales would be enhanced globally through the marketing of Welsh strawberries as part of the Food and Drink Strategy for Wales. Reducing soft fruit imports would minimise Wales' carbon footprint in a responsible way, as would the measures to encourage protected species.

At para 1.19, PPW states: *"In taking planning decisions the planning authority must clearly state the reasons for the decision. Those proposing development also have a responsibility to provide sufficient information to enable the decisionmaker to make an informed judgement on whether the proposed development is sustainable (i.e. contributes to social, economic, environmental and cultural well-being)."* We have therefore paid heed to pre-application advice and provided a good level of information to facilitate the decision.

The sustainable management of natural resources is set out in Section 3. At 3.32, it refers to the need for:

"• improving the resilience of ecosystems and ecological networks; (and)

• halting and reversing the loss of biodiversity;"

This proposal not only has a very limited impact on ecosystems, but would also be undertaken in a manner to protect habitats and protected species, and measures would be taken to maintain and probably enhance biodiversity.

The concept of "place-making" is an emerging theme for the revised document. The principles of place-making in rural areas is set out in Section 3. It states (3.34) *"The countryside is a dynamic and multi-purpose resource. In line with sustainable development and the national planning principles and in contributing towards placemaking outcomes, it must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources. The need to conserve these attributes should be balanced against the economic, social and recreational needs of local communities and visitors."* Therefore, we have sought to set out the economic advantages of the proposal against the possible impacts on rural resources.

The importance of the rural economy is set out in Section 5.6. Para 5.6.1 states:



“A strong rural economy is essential to support sustainable and vibrant rural communities. The establishment of new enterprises and the expansion of existing business is crucial to the growth and stability of rural areas.”

This statement provides very clear encouragement for the expansion of rural enterprises, and this proposal would not only safeguard the business at Springfield, but would also maintain the viability of other Welsh farms.

Section 6.6 deals with flood risk. It includes a reference to *“ensur(ing) sustainable drainage systems are an integral part of design approaches for new development; “*. We have paid heed to local concerns about flood risk and considered how water should be managed in an integrated way from the very start of drawing up proposals for the site.

PPW values the importance of the Welsh landscape. Para 6.3.3 states:

“All the landscapes of Wales are valued for their intrinsic contribution to a sense of place, and local authorities should protect and enhance their special characteristics, whilst paying due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places. Considering landscape at the outset of formulating strategies and policies in development plans and when proposing development is key to sustaining and enhancing their special qualities, and delivering the maximum well-being benefits for present and future generations as well as helping to deliver an effective and integrated approach to natural resource management over the long term.”

We have recognised that a development with such a large footprint might have the potential for impacting on the landscape, and therefore have considered matters carefully, but conclude that the impact on character and views will be acceptable.

TAN 6 Planning for Sustainable Rural Communities July 2010

Its purpose is to provide practical guidance on the role of the planning system in supporting the delivery of sustainable rural communities and provides guidance on how the planning system can contribute to:

- Sustainable rural economies;
- Sustainable rural housing;
- Sustainable rural services; and
- Sustainable agriculture

Chapter 3 Sustainable Rural Economies states: *“Strong rural economies are essential to support sustainable and vibrant rural communities. A strong rural economy can also help to promote social inclusion and provide the financial resources necessary to support local services and maintain attractive and diverse natural environments and landscapes. The development plan should facilitate diversification of the rural economy by accommodating the needs of both traditional rural industries and new enterprises, whilst minimising impacts on the local community and the environment.”* Thus, strong support is given in principle to developments such as this.



Paragraph 3.1.3 states that this should include supporting the expansion of businesses that are currently located in the open countryside provided there are no unacceptable impacts on local amenity. This statement explains that there are impacts, but that they are acceptable.

Paragraph 3.7.2 advises: *“Many economic activities can be sustainably located on farms. Small on-farm operations such as food and timber processing and food packing, together with services (e.g. offices, workshop facilities, equipment hire and maintenance) are likely to be appropriate uses.”* There is thus overall support for facilities for fruit-packing, as is proposed here, as well as expanding the economic base at other farms, as would be a bi-product of this reaching proposal.

There is advice on glasshouse location, but the assumption in the document was that polytunnels would be temporary structures, and that will not be the case here. However, the TAN makes the very important point that: *“It is important however that the horticultural industry is not held back by over-restrictive approaches to developments which could be sited without detriment to the surrounding area.”* (para 6.8.1) especially as there are no demonstrable detrimental impacts.

TAN 12 Design July 2014

Paragraphs 5.8.4 and 5.8.5 are specific to agricultural buildings. The latter states: *“The scale, form and siting of new agricultural buildings or buildings for on-farm diversification, is usually influenced by the operational needs of the enterprise. Where possible, new buildings should be integrated within the farmstead. Elsewhere, particular care should be taken with siting, massing and detailed design to enable them to fit well into the landscape. The use of materials appropriate to the setting, attention to colours of materials and detailing can all facilitate integration into the landscape.”* The implications of how to ensure the development fits, in practical terms, with the operations of the present enterprise have been key to the layout and design. This application has taken account of the factors for ensuring sustainable design, including consideration of landscape setting; biodiversity; energy management; materials and, not least, water.

TAN 15 Development and Flood Risk July 2004

This note provides guidance on how risk of flooding can arise and how to minimise and manage it. As we have demonstrated, we have considered the management of water at the site as integral to its future, so that the risk of flooding – on and off the site – is minimised.

TAN 18 Transport March 2007

This note explains the need for integrated transport and land use and extols the virtues of transport by means other than the private car, in order to minimise the environmental cost of travel. Therefore, sustainable location is an important factor for most land-use planning, but development related to agriculture has to be resource-led, and not location-led. In respect of farm diversification (there is no specific reference to agricultural development) the Note states:

“Local authorities should adopt a positive approach to development associated with farm diversification in rural areas, irrespective of whether farms are served by public transport (PPW paragraph 7.3.3). This type of small-scale economic development is attached to existing farm businesses that are often situated in relative rural isolation. It is important that a realistic assessment of the transport impacts is made, with a view to reconciling traffic issues with the benefits of encouraging diversification.”



Thus, there should not be an onerous consideration of traffic issues. Indeed, none is warranted here because the enterprise is already well-established and there will not be any significant increase in daily traffic generation, albeit numbers of movements will be extended across the year.

TAN 23 Economic Development, February 2014

At para 1.2.5, this Note states: *“Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development.”* This proposal is responding to existing market trends, but also seeking to alter the supply pattern for soft fruit in Wales.

At para 2.1.1, it comments: *“It should not be assumed that economic objectives are necessarily in conflict with social and environmental objectives. Often these different dimensions point in the same direction. Planning should positively and imaginatively seek such ‘win-win’ outcomes, where development contributes to all dimensions of sustainability.”* This is a very important statement emphasising that new development can indeed be sustainable.

At 2.1.13, the Note reminds us that *“PPW advises that the planning system should particularly support the low-carbon economy”* and it is notable that, operationally, the polytunnels would operate a low-carbon system, with use of carbon dioxide by the plants counteracting the carbon used in the plastic sheeting, and no additional heating required.

The note recognises the value of the Welsh rural economy. It comments, at 3.1.3: *“the needs of established businesses or clusters may be very specific. When businesses expand or modernise, they may need to do so in situ; it may be highly inefficient or impracticable for them to relocate to a sequentially preferable site.”* Those are clearly the relevant circumstances in this case.

9.2 Local Development Plan

The Development Plan for the area comprises the Vale of Glamorgan Adopted Local Development Plan 2011-2026, which was formally adopted by the Council on 28 June 2017, and within which the following policies are of relevance. Those policies suggested in the pre-application advice have been addressed here, but only those parts of policies that deal with this type of development or managing the environment are reviewed.

Strategic Policies

POLICY SP1 – Delivering the Strategy

“The strategy will seek to improve the living and working environment, promote enjoyment of the countryside and coast and manage important environmental assets. This will be achieved by:

2. Promoting a range of employment sites intended to meet the needs of the Vale of Glamorgan and the wider capital region; and

6. Protecting and enhancing the built, natural and coastal environment;....”

Agriculture remains an important element of the local economy, and this development will provide jobs both at the site and elsewhere, while protecting the natural environment.



POLICY SP5 – Employment Requirements

“In order to ensure the continued prosperity of the Vale of Glamorgan and promote growth in the capital region, 492 hectares (369 ha net) of land is allocated to meet regional and local employment needs.”

This proposal does not use up valuable employment land, but rather takes advantage of natural resources – good land and high sunlight levels – at an existing site.

POLICY SP7 – Transportation

This policy has little direct relevance to this proposal, as it focusses on the need for new transport infrastructure. While the policy includes *“All new developments that have a direct impact on the strategic transportation infrastructure will be required to deliver appropriate improvements to the network”*, the key word is “appropriate”, because the direct impact on the road network will be very limited indeed, and no contributions to road improvements can be justified.

POLICY SP9 – Minerals

This policy largely relates to the safeguarding of minerals deposits. The application site lies in an area which is safeguarding for its limestone resource, though that mineral is widespread throughout this region. There have never been any active mineral workings at the site, nor have there been any proposals to do so. This issue had no material value in the determination of the 2015 application.

POLICY SP10 – Built and Natural Environment

“Development proposals must preserve and where appropriate enhance the rich and diverse built and natural environment and heritage of the Vale of Glamorgan including:

- 1. The architectural and / or historic qualities of buildings or conservation areas, including locally listed buildings;*
- 2. Historic landscapes, parks and gardens;*
- 3. Special landscape areas;*
- 4. The Glamorgan Heritage Coast;*
- 5. Sites designated for their local, national and European nature conservation importance; and*
- 6. Important archaeological and geological features.”*

None of the above apply to this site.

Managing Growth Policies

“POLICY MG19 – Sites and Species Of European Importance

Development proposals likely to have a significant effect on a European site, when considered alone or in combination with other projects or plans will only be permitted where:



- 1. The proposal is directly connected with or necessary for the protection, enhancement and positive management of the site for conservation purpose; or*
- 2. The proposal will not adversely affect the integrity of the site;*
- 3. There is no alternative solution;*
- 4. There are reasons of overriding public interest; and*
- 5. Appropriate compensatory measures are secured.*

Development proposals likely to have an adverse effect on a European protected species will only be permitted where:

- 1. There are reasons of overriding public interest;*
- 2. There is no satisfactory alternative; and*
- 3. The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.*

This is an important policy consideration given the significant population of Great Crested Newts at the site. The issue was considered fully by the local authority ecologist and by Natural Resources Wales at the time of the 2015 application, and the measures proposed to be used to manage the site during construction and going forward were found to be acceptable. The use of polytunnels rather than glasshouses means that there is less damage to the foraging areas of the newts, and a greater range of mitigation measures is now proposed, so that the impact will be less damaging either to the habitat or to the species.

POLICY MG20 – Nationally Protected Sites and Species

Development likely to have an adverse effect either directly or indirectly on the conservation value of a site of special scientific interest will only be permitted where it is demonstrated that:

- 1. There is no suitable alternative to the proposed development; and*
- 2. It can be demonstrated that the benefits from the development clearly outweigh the special interest of the site; and*
- 3. Appropriate compensatory measures are secured; or*
- 4. The proposal contributes to the protection, enhancement or positive management of the site.*

Development proposals likely to affect protected species will only be permitted where it is demonstrated that:

- 1. The population range and distribution of the species will not be adversely impacted;*
- 2. There is no suitable alternative to the proposed development;*



3. The benefits of the development clearly outweigh the adverse impacts on the protected species; and

4. Appropriate avoidance, mitigation and compensation measures are provided.”

The response is that for MG19: the proposals accord with the policy.

POLICY MG21 – Sites of Importance for Nature Conservation, Regionally Important Geological and Geomorphological Sites and Priority Habitats and Species

“Development proposals likely to have an adverse impact on sites of importance for nature conservation or priority habitats and species will only be permitted where it can be demonstrated that:

1. The need for the development clearly outweighs the nature conservation value of the site;

2. Adverse impacts on nature conservation and geological features can be avoided;

3. Appropriate and proportionate mitigation and compensation measures can be provided;

and

4. The development conserves and where possible enhances biodiversity interests.”

This site is not one of importance, but it is recognised that Great Crested Newts are a priority species. The adverse impact can be avoided by good construction and site management, and good mitigation measures are proposed.

POLICY MG22 – Development in Minerals Safeguarding Areas

In addition to the earlier comments about safeguarding, this policy only allows development in safeguarded area where:

“1. Any reserves of minerals can be economically extracted prior to the commencement of the development;

2. Or extraction would have an unacceptable impact on environmental or amenity considerations; or

3. The development would have no significant impact on the possible working of the resource by reason of its nature or size; or

4. The resource in question is of poor quality / quantity.”

Here, there is no detailed knowledge of the quality or viability of the mineral at the site. However, even if there were good quality minerals, the impact of their extraction would be considerable and certainly more than that caused by this proposed development. Moreover, although they are covered by long-lasting plastic, the polytunnels are not permanent structures and thus would not prejudice future mineral extraction. The development thus accords with this policy.



Managing Development Policies

POLICY MD1 - Location of New Development

This is a general “catch-all” policy for locating development. It states (*inter alia*):

“New development on unallocated sites should:

- 1. Have no unacceptable impact on the countryside; There will only be a minor, acceptable, impact.*
- 5. Have access to or promote the use of sustainable modes of transport; This objective cannot readily be achieved, but journeys to work are minimised through the provision of accommodation for staff on site.*
- 6. Benefit from existing infrastructure provision or where necessary make provision for new infrastructure without any unacceptable effect on the natural or built environment; There is adequate infrastructure at the site to allow for the expansion of fruit production.*
- 7. Where possible promote sustainable construction and make beneficial use of previously developed land and buildings; Much of the site was once occupied by a glasshouse.*
- 8. Provide a positive context for the management of the water environment by avoiding areas of flood risk in accordance with the sequential approach set out in national policy and safeguard water resources; There is an integrated and sustainable approach taken to water management; and*
- 9. Have no unacceptable impact on the best and most versatile agricultural land.” The site does not fall into Grades 1, 2 or 3a.*

POLICY MD2 - Design of New Development

“In order to create high quality, healthy, sustainable and locally distinct places development proposals should:

- 1. Be of a high standard of design that positively contributes to the context and character of the surrounding natural and built environment and protects existing features of townscape or landscape interest; Polytunnels are function-led in terms of design, but their impact on landscape character has been assessed as acceptable.*
- 6. Have no unacceptable impact on highway safety nor cause or exacerbate existing traffic congestion to an unacceptable degree; The impact on the highway will be limited and acceptable.*
- 8. Safeguard existing public and residential amenity, particularly with regard to privacy, overlooking, security, noise and disturbance; There will be negligible impact on public and residential amenity.*
- 10. Incorporate sensitive landscaping, including the retention and enhancement where appropriate of existing landscape features and biodiversity interests; No additional landscape measures are essential to make the development acceptable, but some additional planting is offered as an enhancement to the environment.*



11. *Provide adequate facilities and space for the collection, composting and recycling of waste materials and explore opportunities to incorporate re-used or recyclable materials or products into new buildings or structures; These facilities are already provided, and*

12. *Mitigate the causes of climate change by minimising carbon and other greenhouse gas emissions associated with their design, construction, use and eventual demolition, and include features that provide effective adaptation to, and resilience against, the current and predicted future effects of climate change.”* Account has been taken of climate change in assessing impact on water resources.

POLICY MD7 - Environmental Protection

“Development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either:

- 1. Pollution of land, surface water, ground water and the air;*
- 2. Land contamination;*
- 3. Hazardous substances;*
- 4. Noise, vibration, odour nuisance and light pollution;*
- 5. Flood risk and consequences;*
- 8. Any other identified risk to public health and safety.*

The development will not disturb contaminants or hazardous substances, nor will it lead to additional pollution. It will not be lit nor produce additional noise. The water management measures will minimise flood risk and there will not be any increased risk to public health or safety.

POLICY MD9 - Promoting Biodiversity

The development will not only safeguard the biodiversity at the site, but also the mitigation measures will enhance that value.

POLICY MD17 - Rural Enterprise

“Proposals for the development of small scale employment uses that promote rural enterprise will be permitted where the proposal:

- 1. Is located within a minor rural settlement; or*
- 2. Is part of a farm diversification scheme; or*
- 3. Involves the conversion of an existing rural building in accordance with policy MD11.”*

This policy is not entirely relevant in that it does not cover the expansion of existing agricultural enterprises.



9.3 Summary of Policy Analysis

Policy from the Welsh Government and at the local level generally supports rural enterprise in general, and agriculture in particular, if it does not detrimentally impact upon the environment. The impact on material environmental factors has been considered, and the proposals are aligned throughout. This is thanks to an integrated approach to form, function and management.

10. Conclusion

We have followed the pre-application advice thoroughly, with the exception of not providing a noise survey, as it is not necessary. We will take account of constructive comments to be received through the pre-submission consultation. Therefore, we hope we will submit a comprehensive application that “gets it right first time.”

Promoting an optimistic tone in this statement is justified, given that the principle of development at the site has been established through the 2015 application. The process associated with that successful application enabled us to understand well the implications of development on the natural resources of the site, especially landscape, ecology and drainage, so that the revised proposals build upon information and enhance the proposals. Indeed, the evolution of the new proposals has been achieved in an integrated manner through teamwork with specialists in those fields, while ensuring a viable development can emerge.

There will be a larger footprint of development at the site, through the polytunnels, than under the glasshouse proposals. However, its impact is countered to a significant extent by lower height and by non-glare material, and the polytunnels will be open to continued use by newts. Thus, and given the proposed mitigation measures in the form of additional planting and refugia/hibernaculae for the newts, there may potentially be environmental gains through the proposal. It should be noted that there will not be any lighting at night, other than for security purposes, so the night-time character of the site will be retained.

The present glasshouses are not economic in themselves. The polytunnels are essential to extend the growing period to cover the increasing demand for Welsh strawberries in Wales, and to allow economic use of the land. The proposals will sustain summer employment at the site, so that picking over 9 months will be possible. New jobs will be created for that summer period, too, and proposals will be presented to promote training at the site of hopeful soft fruit producers from farm throughout South Wales, so that the strategic benefit of the proposal will be considerable.

So, when one reviews planning policy, it is clear that the proposal accords not only with those policies encouraging economic development whilst also according with policies to protect and enhance amenity and environmental resources. Therefore, following the presumption in favour of sustainable development, we argue strongly in favour of planning permission being granted. Indeed, we have sought to provide full information so that no pre-commencement conditions will be necessary, and that fruit production in the polytunnels will commence, in line with programme, in Spring 2021.