

**From:** parish.clerk mardenherefordshire-pc.gov.uk <[parish.clerk@mardenherefordshire-pc.gov.uk](mailto:parish.clerk@mardenherefordshire-pc.gov.uk)>  
**Sent:** 05 August 2022 20:53  
**To:** Jenman, Rebecca <[Rebecca.Jenman@herefordshire.gov.uk](mailto:Rebecca.Jenman@herefordshire.gov.uk)>  
**Subject:** P221524/F Re-Consultation

Dear Rebecca,

Please find attached further comment from Marden Parish Council re planning application P221524F Re-Consultation.

Marden Parish Council continues to Object to the application.

Regards,

Jeremy.

(NB. I am the new Parish Clerk for Marden Parish.)

Jeremy Stephens, Marden Parish Clerk

83 Walkers Green, Marden, Hereford, HR1 3EA. 07856  
282037. [parish.clerk@mardenherefordshire-pc.gov.uk](mailto:parish.clerk@mardenherefordshire-pc.gov.uk)

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P221524/F, Drakeley Farm, HR1 3ES – Erection of up to 13.5 hectares of fixed (i.e. non-rotating) ‘Spanish’ Polytunnels over soft fruit grown on ‘table tops’, excavations and ground profiling to form new winter storage reservoir and the erection of an agricultural building and 6 n. water storage tanks

ADDITIONAL REPRESENTATION FROM MARDEN PARISH COUNCIL

**Marden Parish Council Strongly OBJECTS** to this planning application.

In regard to the planning application 221524 re-consultation issued on the 15 July 2022.

(This further objection refers to the original objection submitted by Marden Parish Council and refers to the numbered clauses there.)

When considering this re-consultation, the relevant planning policies are the made Marden Neighbourhood Development Plan (NDP) (2016), Herefordshire Council’s Core Strategy (2015) and the National Planning Policy Framework (2021) (NPPF). Planning applications are decided in accordance with the development plan, unless material considerations indicate otherwise.

Marden Parish Council have discussed the additional supporting documents:

- Surface Water Nutrient Assessment: (SWNA) Drakeley Farm. April 2022
- Flood Risk Assessment and Drainage Strategy (FRADS). April 2022

and make the following comments:

1. The current baseline appears to have been created from non-verifiable data supplied by S&A. The numbers suggest that the current application is far higher than is required hence the high surplus. Sensible farming would match the application to the ability of the crop to use.
2. This very high base case will inevitably give high savings which only exist due to this over application.
3. The results used for polytunnels are based on another incompatible and completely different operation in a different part of the country.
4. The results are an ‘assessment’ using data supplied; there have not been any actual measurements or tests taken on the site. ( SWNA, 2 Method, page 4)
5. We are unable to measure the amount discharged, but observation on the current tunnels shows algae growth associated with high levels of nitrogen and phosphorus in the areas where the water is discharged which leads us to question the numbers provided. (SWNA, 3 Input Data, page 5)
6. We do not agree with the comment, ‘No foul water will be generated as part of the proposed development’ as no on-site testing has taken place.
7. The substrate used to grow the strawberries in is disposed of offsite. Any residual nitrogen and phosphorus in substrate will have been excluded from the calculations.
8. The current Climate Change objectives are not referred to.

9. FRADS does not provide any strategy for the management of overflow/storm water flowing into the surrounding areas. It purely focusses on the 'Site' and the risk of flooding of the 'Site'. (FRADS, all pages)
10. Further, 'The nearest suitable receiving waterbody for the discharge of attenuated surface water from the proposed development is either the central watercourse at the Site or the water course that abuts the northern boundary of the Site, both of which are tributaries of the River Lugg.' No indication is given re the filtering of wastewater/attenuated water before it is poured into the River Lugg. This is an environmental problem that requires further study. (FRADS, 5.3 Runoff Destination Assessment, page 14)
11. FRADS page 15 refers to the ponds 'located immediately downgradient of the polytunnels. These ponds are of ecologically(sic) importance.' The strategy to protect these ponds neglect the chemical content of any runoff and assumes that a reservoir and pumping system will be enough to alleviate a '7 day storm event without discharge.' No plan is shown as to how the 'discharge' be controlled or filtered. Nor is there a plan showing alternatives to the pumping system if it or its power supply fails. In fact the FRADS assumes, incorrectly, the local ponds will need 'topping up' with the water from the 'Site'.
12. Climate Change has not been a part of the calculations.
13. There is a real problem in that the local water table, which many residents have to draw their water supply will become unpotable due to the chemicals used in industrial farming overflowing into the area.
14. The area where the ponds are located is regularly flooded becoming impassable to traffic.
15. The locality is not sustainable now, problems already exist with sewage, water and power supplies being inadequate, and require much investment from Government before any further development is undertaken.
16. As with SWNA, FRADS is an assessment not a real-world survey and relies on data from models.

On the basis of the above comments, many of which need to be addressed with appropriate studies, Marden Parish Council continue to request that the planning application be refused.

(Clauses referred: 13, 14, 15, 16, 17, 19, 20, 21, 22, in the original Marden Parish Council Objection, cf.