Herefordshire Council

MEETING:	**PLANNING COMMITTEE**
DATE:	**9 JANUARY 2013**
TITLE OF REPORT:	**S121357/N - CONSTRUCTION OF A 499KW AGRICULTURAL ANAEROBIC DIGESTION AND ANCILLARY DEVELOPMENT TO PRODUCE RENEWABLE ENERGY FROM ONSITE GENERATED WASTES AND ENERGY CROPS. AT LITTLE PENGETHLEY FARM, PETERSTOW, ROSS-ON-WYE, HR9 6NB** **For: Mr Green per Mr Robert Edwards, 4205 Park Approach, Thorpe Park, Leeds, LS15 8GB**
WEBSITE LINK:	http://www.herefordshire.gov.uk/housing/planning/58286.aspx?ID=121357&NoSearch=True

Date Received: 8 May 2012 **Ward: Pontrilas** **Grid Ref: 354088,225240**
Expiry Date: 7 August 2012
Local Members: Councillors RB Hamilton and JA Hyde

1. Site Description and Proposal

1.1 Little Pengethley lies approximately 6 kilometres west of Ross on Wye along the A49(T) towards Hereford, close to St Owen's Cross. It accommodates Gamber Produce Ltd, and is part of a farm enterprise operationally based at Ditton. The farm holding covers over 1400 hectares (3500 acres) in all, incorporating other holdings and enterprises in the vicinity including poultry units, fruit/vegetable production, arable, haulage yard, farm contracting and poultry unit cleaning services. A small part of the Gamber site lies within Sellack parish (Llangarron Ward), but the majority, including the application site, lies within the parish of Hentland (Pontrilas Ward). The site has two approved accesses; one from the A49(T) into Gamber Produce's yard, and a second entrance along a drive to the south which joins the B4521 near St Owen's Cross.

1.2 The proposal is to install a 499kW anaerobic digester producing bio-gas, to be used to generate power and heat from a combination of poultry litter, vegetable waste and energy crops, all produced from within the enterprise. The plant would be located on land adjoining existing large chiller and packing buildings, offices and yards. This complex is a distribution centre for the farm's fruit and vegetable crops. Development would comprise the following:

- 2 digester tanks, each 25.1 metres diameter. The height would be 7.35 metres but set down by 2-4 metres to minimise impact. Part of the tank tops would have domed double-membrane gas-holders; maximum height 11.475 metres, approximately 7 metres above ground level;
- 2 digestate storage tanks also 25.1 metres diameter, similarly set down, but without the domed tops: actual height 7.150 metres, height above ground level approximately 4 metres;
- Traditional agricultural silage clamp contained by concrete bays; enclosure approximately 80 x 30 metres, height 3.2 metres;
- Digestate separator (7 x 12.746 metres, 4.7 metres high) and associate dry clamp;

- Ancillary equipment including combined heat and power unit (CHP), transformer, sub-station, boiler room, feeder unit, reception tank, control kiosk and surplus gas flare 7 metres high.
- The plant would be contained within a low-bunded impermeable area to Environment Agency specification.

1.3 This application is a resubmission of application reference S112374/N for a similar proposal, withdrawn on 3 November 2012.

1.4 A formal Screening Opinion was issued on 1 August 2011. This concluded that Environmental Impact Assessment (EIA) would not be required because (a) the actual operational area does not exceed the threshold; (b) the site is not within a 'sensitive area' as defined in the legislation, and (c) the specification falls well below the indicative output criteria of 50 MW given in Circular 02/99. A second Screening Opinion to the same effect was issued on 7 December 2012 relating to the resubmitted scheme and to include the proposed drainage system (SUDS).

2. Policies

2.1 Legislation

Town and Country Planning (Environmental Impact Assessment) Regulations 2011

2.2 National Planning Policy Framework (NPPF)

The NPPF carries significant weight and presents a broad overview of central government's approach to planning policy. It presumes in favour of sustainable development (defined in the document) within the context of a plan-led system and up-to-date adopted local policies. The NPPF must be viewed in its entirety, but particular specific elements in this case are relevant. These include section 3 'Supporting a prosperous rural economy' and section 10 'Meeting the challenge of climate change'. Both support the proposal in principle at strategic level. Section 12 seeks to secure protection of the historic environment whilst recognising the need for the built environment to develop.

2.3 UK Renewable Energy Strategy (2009)

This document sets government targets for renewable energy to 2020 and is under regular review.

2.4 Anaerobic Digestion Strategy and Action Plan (2011)

This document is published jointly by the Department of Environment Food and Rural Affairs (Defra) and the Department of Energy and Climate Change (DECC). It acknowledges and supports the potential for farm-based enterprise to generate renewable energy utilising effluent, waste and energy crops.

2.5 Other Guidance

- UK Biomass Strategy 2007 (joint Defra/DTi/DfT publication)
- Environment Agency Position Statement 'Anaerobic digestion of agricultural manure and slurry' 2010
- www.biogas-info.co.uk 'The Official Information Portal on Anaerobic Digestion' - Defra/DECC

2.6 Herefordshire Unitary Development Plan (UDP)

S1	-	Sustainable development
S2	-	Development requirements
S6	-	Transport
S7	-	Natural and historic heritage
S11	-	Community facilities and services
DR1	-	Design
DR2	-	Land use and activity
DR3	-	Movement
DR4	-	Environment
DR9	-	Air quality
DR13	-	Noise
DR14	-	Lighting
E12	-	Farm diversification
T6	-	Walking
T8	-	Road hierarchy
LA2	-	Landscape character
LA6	-	Landscaping schemes
NC1	-	Biodiversity and development
NC6	-	Biodiversity Action Plan priority habitats and species
NC7	-	Compensation for loss of biodiversity
NC8	-	Habitat creation, restoration and enhancement
NC9	-	Management of features of the landscape important for fauna and flora
ARCH1	-	Archaeological assessments and field evaluations
ARCH6	-	Recording of archaeological remains
CF4	-	Renewable energy

2.7 The Unitary Development Plan policies together with any relevant supplementary planning documentation can be viewed on the Councils website by using the following link:-

http://www.herefordshire.gov.uk/housing/planning/29815.aspp

3. Planning History

3.1 S112357/N - Anaerobic digester on the same site, withdrawn on request 3 November 2011.

3.2 DCSW2008/1755/N – Change of use of an existing building and a small area of land adjoining the application on the north side, to a Waste Transfer Station for agricultural packaging and plastic, approved 18 September 2008. Not implemented – expired 18 September 2011.

3.3 DCSW2007/0937/F – Alterations and upgrading of existing access track to B4521; approved 18 June 2007.

3.4 DCSW2006/3320/F – Extension to adjoining haulage and trailer yard; approved 6 December 2006.

3.5 Historic applications and permissions in the 1980s and 1990s relating to potato storage and packing buildings undertaken prior to Gamber Produce Ltd occupying the adjoining site.

4. Consultation Summary

Statutory Consultees

4.1 Environment Agency - Initial objection to the previous application (S112374/N) pending an assessment of potential effects on groundwater. On this resubmission, a detailed letter from the Agency offering extensive advice included details of the necessary Environmental Permit which would be the key regulatory mechanism, and the following statement: 'We have no objections to the proposed development. .... On clarification of details, and following a review of constraints, in this instance we are satisfied that the principle of this development is acceptable at this location'. Following discussions, further flood risk work submitted by the application resulted in confirmation of the Agency's position: 'We have no objections to the proposed development. Without prejudice, based on the information received, we do not foresee any showstopper issues relating to the requirements of an Environmental Permit'.

4.2 National Grid - has no objection to the proposal with regard to high pressure gas main or high voltage underground cables.

4.3 Highways Agency – No objection in principle, accepting there would be no significant intensification of use of the junction between the B4521 and the A49(T). However, a 'holding direction' was issued pending consideration that any additional or occasional use of the direct A49(T) access at Gamber Produce would require a re-assessment of that access, and modifications if necessary. The applicant revised and removed the intention to use the A49 for some deliveries to the plant, and the holding direction was lifted with confirmation of no objection. This is discussed in more detail below.

4.4 Herefordshire Primary Care Trust – Poultry farms, composting and also AD plants have the potential to produce bioaerosols. However, Environment Agency and Health Protection Agency advice is that this only arises within 250 metres of the source. Beyond that distance any aero-allergen levels are normal/background, and unlikely to pose a risk to residential properties. Such plants are regulated by the Environment Agency. No objection.

Internal Council consultations

4.5 Transportation Manager – Concerns about possible traffic impact at St Owen's Cross due to existing road safety issues. An assessment of the access and the likely use levels is required. Works may be necessary to improve visibility at the junction of the access track to the B4521. The proposal could intensify use of this access. Subsequent comments following further information from the applicant: the applicant has confirmed that the plant would be serviced from the farmland surrounding the site and owned by the applicant, with be no increase to existing vehicle movements overall. On that basis no objection. However, St Owen's Cross has a history of accidents generally. Recommendation for a Traffic Management Plan to minimise any additional pressure on the crossroads.

4.6 Head of Environmental Health and Trading Standards - The application includes an adequate noise report and odour assessment. I am satisfied that the application addresses any potential concerns regarding odour, noise and lighting. No adverse comments in relation to air quality. The site would be regulated by an Environmental Permit from the Environment Agency. No objection. Condition recommended, to secure proposed noise mitigation as submitted.

4.7 Drainage Advisor - Drainage should be designed and sized on the entire working area, to allow for future circumstances. I would favour a holding area, e.g. a tank or swale, with details of any final discharge. No objection.

4.8 Public Rights of Way Manager: the right of way will not be affected.

4.9 Conservation Manager (Landscapes): The Landscape Character is 'principle settled farmlands'. The site adjoins large-scale warehousing and a lorry park; the field to the south is open. The north side is well screened. The submitted landscape and visual impact

assessments are adequate and meet recommended guidelines, adequately covering key public viewpoints in the vicinity. The site adjoins the boundary of the Wye Valley Area of Outstanding Natural Beauty, but in itself has no key landscape features and the surrounding land is not of high quality. The proposal would extend the complex of large buildings at Gamber out into the currently empty field. Proposed planting would help to mitigate the impact. Planting should be as naturalistic as possible, with new hedgerows extending along the eastern site boundary and the Gamber site. Provision of new habitat is recommended. On the basis of the above there is no landscape objection. These comments were made on the previously withdrawn application. Confirmation received that these comments also apply to this resubmission.

4.10 Conservation Manager (Ecology): The submitted Ecological Assessment appears to be a fair representation of the site. It is an arable field with hedgerows and margins, which are the main biodiversity interest as Herefordshire Biodiversity Action Plan Priority Habitats. The creation of balancing ponds/swales would be welcomed, if incorporated as new seasonal wetland habitat. No objection, recommendation for a condition to secure ecological mitigation through a habitat creation scheme.

4.11 Conservation Manager (Ecology Consultant): The site is nearly 8 kilometres via any hydrological drainage from the SAC (River Wye Special Area of Conservation). Provision has been made for spillage to 110% of the largest tank, minimising the risk of any contamination. I would conclude there will be No Likely Significant Effect on the River Wye SAC.

4.12 Conservation Manager (Archaeology): The Archaeological Advisor states that the site might include at-risk heritage assets, although it is considered that mitigation could and should be achieved. No objections raised: recommendation for a standard condition to secure an appropriate archaeological recording project, as recommended within the submitted application.

5. Representations

5.1 Further comments were received from the applicant after this submission. Appendix 1.1 to the re-submitted Supporting Statement (initially dated April 2012) gives the applicants' detailed responses to questions from the Environment Agency, the case officer and objections from residents in relation to the original withdrawn application (reference S112374/N). In addition, the applicants held a public meeting on 31 May 2012 to answer questions on local concerns about traffic, odour, location of the plant, the nature of AD plants, health and safety etc. A report in the form of a Q&A sheet is included with the file papers. In response to questions about the operation of the plant and safety considerations, Mr Russell Mulliner of Marches Biogas provided an explanatory report which sets out the technical specifications and safeguards, which is also with the file papers. Mr Mulliner is a qualified and experienced engineer who has been involved with the design and construction of AD plants for many years, including installations at other sites in this locality.

5.2 Hentland Parish Council: (First response 26 June 2012): A public meeting was held at the New Inn to hear residents' views. The Parish Council comments as follows: Seasonal additional traffic is the greatest concern. There is no footway on the B4521 and residents need to get to the bus stop on the A4137. The increase in movements at harvest time would present an increased risk of accidents. Could a pathway be provided along the B4521? St Owen's Cross is a known danger spot with frequent accidents despite measures in place. Visual impact should be mitigated as much as possible, through planning conditions. The Parish Council requests that the application be presented to the Planning Committee due to the controversial nature of the proposal.

5.3 Hentland Parish Council: (Second response 11 October 2011): Objection to the exclusive use of the B4521 entrance, raising the following points:-

a) vehicles travelling south on the A49 would have to turn right onto the A4157 or at the junction with the B4521;
b) traffic using the A4157 would increase use of the dangerous St Owen's Cross;
c) either way, vehicles would pass close to residential properties and the bus stop used by schoolchildren;
d) trailer-loads of vegetation may smell;
e) using the A49 entrance would reduce the risks, even if a filter lane were required;
f) concerns amongst members about safety risks from the technology.

5.4 Sellack Parish Council: Supports the application. The proposal would be a natural addition to the current farming enterprises. Using material that would otherwise be 'waste' to generate energy and the residue ploughed back is to be applauded. The implications for the local community have been carefully considered. Farming methods need to be progressive in times of economic depression. Members would like to visit the plant in due course.

5.5 A total of 29 letters and emails of objection were received from residents during the first consultation period for this application. The additional and amended details subsequently submitted have generated several additional consultation periods. Traffic and road safety are by far the most significant concerns. All the letters raised similar matters, which are summarised as follows:

- Support in principle for AD plants, but this is on an industrial scale in the wrong place and too close to houses. Why not build it at Ditton or elsewhere, or near to the poultry units?
- Road safety - any additional use of the B4521 and/or the A4137 at St Owen's Cross would be unacceptable. The junction is very dangerous with a history of serious accidents. There is no footway on these narrow but busy roads, used by schoolchildren every day. The road surface is poor, and damaged by large vehicles. This proposal will cause further deterioration. These roads are used as a diversion if the A40 or A49 are closed.
- Traffic - Any extra traffic generated by the proposal would be unacceptable. The Highways Agency will not allow further use of the A49 entrance so all traffic to the plant would use the St Owen's Cross entrance on the B4521.
- The applicant's land holdings are separate so the crops and poultry litter would have to be transported on the highway, not within the holding as implied.
- The application claims there would be no overall increase in traffic numbers and movements, but this is not accepted. Deliveries of energy crops to the site would be seasonally concentrated at harvest time and would represent a significant increase at certain times.
- Visual impact - this huge plant would be close to houses and would add to the industrialisation of open countryside on the fringes of the Area of Outstanding Natural Beauty.
- Flood risk - there have been recent flood incidents at Ashen Coppice and its neighbours, from surface water during significant rainfall events. A Flood Risk Assessment is required as the site is more than 1 hectare. Further hardstandings could increase existing flood threats.
- Smell - Other plants [in England] have generated significant odour complaints. Storage of the vegetable/crop feedstock can be odorous and produce run-off. We will not be able to sleep with the windows open or enjoy our gardens.
- Noise - The CHP unit is very noisy. We visited the site at Oswestry and measured 45dB at 125 metres at that plant.
- Pollution - There is a threat of pollution to watercourses. Wildlife could be adversely affected.
- Safety - The applicant has said there will be no skilled or qualified staff on site; there is a risk of explosions; does the fire brigade know how to deal with a fire at an AD plant? There is no lightning conductor shown on the plans;

- Health - People with health problems such as asthma will be adversely affected. The site is too close to houses.

5.6 Further details and amendments were submitted by the applicant, in response to matters arising during the consultation period. In particular, clarification was provided on Environment Agency requirements (although the Agency had not objected). This included details of the tank bunding area (required for containment volume of 110% of the largest tank capacity), and a plan showing drainage and a seasonal swale to accommodate surplus rainwater during extreme weather events. Negotiations with the Highways Agency resulted in the applicant confirming that no vehicles exclusively accessing the AD plant would use the A49 entrance.

5.7 These were re-consulted on, allowing a further period for comments to be received from both professional consultees and members of the public. These matters are discussed in more detail below. A further 20 representations were received; the majority are from local people who had written previously. Previous concerns were repeated and some additional comments were made in relation to the new information. These are summarised as follows:

- The application has been altered and a new application should be made;
- The addition of a lagoon is outside the site area and is a significant change;
- We are worried that the lagoon will make flooding issues worse;
- At a recent fire at another AD plant, the Fire Authority did not know how to deal with it;
- Matters of safety and fire risk have still not been addressed;
- As predicted, the Highways Agency has refused to allow use of the A49 entrance;
- Exclusive use of the B4521 entrance will be intolerable;
- The traffic figures in the application are inaccurate and are challenged; actual numbers would be excessive;
- Ministers are questioning the ethics of growing energy crops instead of food;
- There have been numerous odour complaints about an AD plant in Staffordshire/the West Midlands;

5.8 The consultation responses can be viewed on the Council's website by using the following link:-
www.herefordshire.gov.uk/housing/planning/searchplanningapplications.aspx

Internet access is available at the Council's Customer Service Centres:-
www.herefordshire.gov.uk/community_and_living/consumer_advice/41840.asp

6. Officer's Appraisal

Principle of the development

6..1 The proposed plant would have an electrical output of 499 KW of renewable energy, fuelled by poultry litter, vegetable waste and energy crops all produced from within the holding. Heat from the unit would be used to run the large chillers at the adjacent packing station and to heat buildings. Power output must be fed into the grid, a 3-phase connection for which is available at this site. On-farm digesters are subject to Environmental Permitting, regulated by the Environment Agency. Controlled matters include site management; activities and operations; quantity and types of waste (where applicable); emissions to land, air and water including odour, noise etc; monitoring and reporting. This is the key regulator, under Environmental Protection legislation, and takes precedence over planning. The planning system must take account of these factors as material considerations, with an emphasis on the proposal's capability for compliance, based on the Environment Agency's views. Other matters such as traffic and landscaping do fall into the remit of the planning system.

6.2 Anaerobic digestion (AD) has long been used for utilising the residual calorific value in organic material otherwise regarded as 'waste', to generate heat and power. This has been widely deployed by the water industry at sewage treatment plants. Smaller farm-based plants have

become increasingly common as technology develops, presenting opportunities to manage agricultural effluent and increase sustainability. The AD process harnesses natural biological processes, breaking down organic matter within sealed tanks. Microbes and bacteria 'digest' a mix of effluent and crops ('feedstock') over a period of time ('retention period'), during which biogas is produced. Methane forming naturally during decomposition of such material is released to atmosphere if left in the open or composted. It is approximately 30 times more potent than Carbon dioxide as a greenhouse gas. Captured biogas is used to drive a gas engine (Combined Heat and Power (CHP) unit) from which power can be generated to be fed into the grid, and heat can be used at nearby buildings. The process also absorbs some of the chemical compounds within feedstocks, such as nitrates, and can thus help to control diffuse pollution from farm run-off. Because the process removes much of the ammonia, the final residue ('digestate') is considerably less odorous than the raw manure feedstock. It is used as a valuable fertiliser.

Key Issues

6.3 The key points in this case are:

- National policy (NPPF) and government initiatives
- Renewable energy and sustainability
- Location of site, proximity to dwellings
- Visual impact
- Landscape, heritage assets and archaeology
- Biodiversity
- Traffic, highways, access, road safety
- Groundwater, flood risk and run-off
- Odour
- Noise
- Health and Safety
- Air Quality, Pollution prevention

National policy (NPPF) and government initiatives

6.4 The NPPF carries significant weight. It supports renewable energy projects on a range of scales and types, subject to good design and adequate protection for landscapes, biodiversity and heritage. The application considered these factors, which are discussed further below. Section 3 of the NPPF promotes a prosperous rural economy through '*the sustainable growth of all types of business and enterprise in rural areas'* and *'the development and diversification of agricultural and other land-based rural businesses'* (Paragraph 28). Section 10 requires local authorities through their adopted policies to encourage moves towards a low carbon future, to promote renewable energy sources, and to approve proposals where mitigation is possible. Paragraph 97 encourages local authorities to *'recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources'*. Paragraph 98 recognises that '*even small-scale projects provide a valuable contribution'* and advises local authorities to approve an application if its impacts are acceptable subject to other material considerations. Section 11 seeks to conserve and enhance the natural environment including valued landscapes. Paragraph 187 requires local authorities to look for solutions rather than problems and *'at every level ... seek to approve applications for sustainable development were possible'*. Government acknowledges potential for tension between these multiple requirements, but local planning authorities are expected to exercise professional judgement in striking a balance between the various determining factors.

Renewable energy and sustainability

6.5 The UK Renewable Energy Strategy 2009 supports low-carbon bio-energy projects in principle, as part of a range of renewables required, including small-scale contributions. The 'Anaerobic Digestion Strategy and Action Plan (2011)', is published jointly by the Department

of Environment Food and Rural Affairs (Defra) and the Department of Energy and Climate Change (DECC). It acknowledges and supports the potential for farm-based enterprise to generate renewable energy utilising effluent, waste and energy crops.

6.6 The Government has committed to supporting bio-energy crop production. Defra's joint strategy of 2007 sets targets for significant increases in fuel crop production. It regards these as carbon-neutral and a good alternative to using fossil fuel. Wood, maize, beet, Miscanthus (Elephant grass) and other crops were cited as of good calorific value for the purpose. The controversial food-versus-fuel debate is recognised however, and a common-sense balance should be struck to meet a variety of needs whilst avoiding blanket monoculture.

6.7 Government has consistently advised that the planning system relates primarily to land use and should not seek to judge a renewable energy proposal on viability, efficiency or need. The NPPF (paragraph 98) specifically warns that local authorities 'should not require applicants to demonstrate the overall need for renewable or low-carbon energy'. The application states that the purpose of the proposal would be farm diversification, self-sufficiency and reduction of carbon footprint. Surplus energy from a plant of this type is exported via the grid and this has been confirmed as possible, using existing infrastructure close to the site. The export of surplus power to the grid is regarded favourably by Government advice and the funding system of Feed-In Tariffs (FIT) and Renewable Energy Certificates (ROC). Officers accept that the proposal would contribute to overall Government approaches to sustainable renewable energy provision. This meets the relevant parts of policies S1, S11 and CF4 of the Herefordshire Unitary Development Plan (UDP) on these topics.

Location of site, proximity to dwellings

6.8 The applicant's farm holding includes several operational sites, including poultry complexes. The office headquarters are at Ditton Farm, to the west of the application site. Residents have questioned why the AD plant should be at Little Pengethley, and the applicant has responded as follows:

- A viable electrical connection exists at a sub-station; connection at Ditton would not be possible without additional infrastructure;
- Siting the plant at Ditton would entail all vehicles using St Owen's Cross;
- Vegetable waste from Gamber Produce would be immediately available without transport;
- Much of the power and heat would be directly used at Gamber, which is a significant energy consumer for its processes, chiller units and buildings.

6.9 If the AD plant were located at the poultry units, litter, waste and crops from the other parts of the holding would still have to be transported. Little Pengethley is central to the holding. It is also relatively distant from residential dwellings. The nearest properties are Pengethley House and cottages 250 metres to the north beyond the existing large packing sheds; 'Hambletts' (288 metres); and 'Dalchrys' on the north side of St Owen's Cross, which uses the Pengethley access drive and is 200 metres from the site. Pengethley Nursery on the far side of the A49 is 300 metres to the north-east. All other properties in the vicinity and along the B4521 are more than 350 metres away.

6.10 Although to be located on undeveloped farmland, the plant would relate to the extensive haulage yard and buildings associated with Gamber Produce Ltd. The yard is slightly raised and the plant would be slightly set down. It is considered that, on technology and site choice, there is no conflict with UDP policies S1, S2 or S11 and the proposal would comply with policies DR1, DR2, LA2 and CF4.

Visual Impact

6.11 The tanks, equipment and bunded hardstandings would be utilitarian, having an industrial character. However this is the case in an increasing number of agricultural installations on many farms, such as poultry enterprises and dairy units. This is commensurate with the need to increase the production of affordable, good quality food. Renewable energy plays its part in this process in terms of self-sufficiency, reducing carbon footprints of production and limiting the use of fossil fuel. The plant would be located just south of the existing Gamber Produce haulage yard. The Senior Landscape Officer commented that the plant would extend the large-scale development to the south of the existing complex of buildings, but acknowledged that there are no particular features nearby for this to detract from. The submitted Landscape and Visual Impact Assessment has been accepted as meeting recommended guidelines. The visual survey adequately covers the key public viewpoints in the area. Such public view points are limited, due to the topography and the proposal to set the tanks down lower than existing ground levels. The proposed landscaping and planting would mitigate the impact and help to assimilate the plant into its setting. A condition to ensure the tanks would be coloured appropriately would also assist in mitigation. In the context of the existing large-scale haulage yard, the proposal is considered not to conflict significantly with UDP policies S2, DR1 or LA2.

Landscape character, heritage and archaeology

6.12 The local landscape character is 'Principal Settled Farmlands', typified by mixed farming, open fields and a landscape which is subject to change. The site is not within any designated landscape area, although the boundary of the Wye Valley Area of Outstanding Natural Beauty lies just to the east. However the A49 and an expanse of arable field lie in between and the site area is not considered to be of high landscape quality. The Senior Landscape Officer considers that the proposal would not significantly alter the existing character and would offer potential improvements, for example to screen and integrate the haulage yard. There are no objections on landscape grounds or conflict with UDP policy LA2. A landscaping condition is recommended to meet the requirements of policy LA6.

6.13 The site is within an area of general archaeological interest. The proposal would entail excavations to lower the tank bases. However the land has been previously ploughed and the Gamber site is well-developed. The application included an archaeological desk study undertaken previously, which concluded a potential for deposits to be exposed. The Archaeological Advisor considers that this should not prevent the development, but careful observation should be undertaken. Mitigation would be in the form of recording any evidence or artefacts found, to add to the historic record. The proposal recommends investigation during groundworks, to be secured by a planning condition, in accordance with UDP policies S7 and ARCH1.

Biodiversity

6.14 An ecological survey was conducted in 2009 in connection with a different proposal, and this has been updated for the current application. The Senior Planning Ecologist has commented that the assessment appears to be a fair representation of the site. It is an arable field, with hedgerows and field margins offering the main biodiversity interest. Both are Biodiversity Action Plan Priority Habitats and would be retained under the proposal. Balancing ponds and swales would be beneficial to wildlife. A condition would secure mitigation offered in the submission and for a detailed habitat creation and enhancement scheme, under UDP policies S7, NC1, NC6, NC7, NC8 and NC9.

Traffic, highways, access and road safety

6.15 Roads and traffic are the key issues for local residents and this is reflected in individual responses as well as those made by Hentland Parish Council. The junction of the A4137 and the B4521 at St Owen's Cross is regarded by many as an accident black-spot, with letters of

objection citing numerous incidents. The A4137 is used as a diversion at times when the A49 and/or the A40 may be subject to delays or closures.

6.16 Initially, the applicant wished to use the southern entrance off the B4521 for most deliveries, with occasional use of the A49 entrance for any vehicles approaching from the north. The Highways Agency administers use of the A49, and stated that there was no objection to the development in principle, but a full re-assessment of the Gamber entrance, and possibly physical amendments, would be required before any additional use of that access could be supported. The applicant stated that for the small number of occasions anticipated, this would not be cost-effective. The A49 access is used daily by HGVs in connection with Gamber Produce Ltd. The only alternative would be using the southern access drive exclusively, which would also avoid any vehicles accessing the AD plant having to negotiate the haulage yard. Deliveries to the AD plant would be agricultural in nature and indistinguishable from farm traffic generally. As the farm holding covers a wide area and several farms, its produce is already moved by road on a regular basis. The application includes a transport statement and further clarification has been received since submission.

6.17 Table 7.1 (page 41 of the revised supporting statement) shows a total annual feedstock of approximately 13,000 tonnes indicatively comprising 3,000 tonnes of poultry litter, 9,000 tonnes of energy crops (chiefly beet and maize) and 1,000 tonnes of vegetable waste. There would be a further 4,000 tonnes of solid digestate going out from site. In total these are estimated by the applicant to represent 1500 journeys per year, which must be doubled up to account for return journeys although not all would be empties. However, further comments are offered in the application as mitigation, as follows:

- No net increase in manure movements as the poultry litter is already moved on the road;
- Vegetable waste currently trucked out would be kept on site for the AD plant and therefore would be 100 loads a year fewer;
- Energy crops would be grown on existing arable land already subject to husbandry and harvesting movements, so no change to existing patterns.
- Liquid digestate would be used for irrigation via pipeline and not transported by road.
- Some of the projected 1500 movements would be offset by a reduction in (or overlap with) existing farm movements.
- The estimates use 10 tonnes per load as a baseline. This is a minimum and a proportion of trips would carry more, thus reducing trips overall. The calculations are thus a 'worst case' scenario.

6.18 Letters have been received about projected vehicle movements in particular. As far as it is possible, the applicant has separated movements exclusively related to the AD plant from normal farming activities. Some transport movements overlap with (and must be offset against) existing farm activities because poultry litter and crops are already being regularly moved on the highway network. Movement of crops is seasonal and not undertaken year-round. Table 7.2 (also page 41) illustrates indicative movement patterns and is reproduced here for clarity:

Material	Peak vehicle numbers (and trips) per day	Comments (applicant)
Poultry litter	1(2)	Stored off-site at production source and shipped in daily at a set rate, not stockpiled
Beet crop	2 (4)	Harvested over a 6 month period, trickle-delivered daily and not stockpiled
Maize	14 (28)	Harvested over a 5 week period, stored on site in silage clamp
solid digestate out-going	1 – 2 (max 4)	Transferred out daily/weekly throughout the

		year

The above table indicates a low level of highway movement overall. It highlights that the key impact would be the maize harvest, concentrated into 5 weeks or so, with the crop stored in the proposed silage clamp on site. Beet harvesting would be spread out over six months from Autumn to Spring, with crops brought to site for direct feed to the digester with little on-site storage. The applicant has pointed out that the energy crops would be grown within the holding as an alternative to existing arable crops and potatoes. Potatoes in particular generate large numbers of traffic movements due to regular spraying during the growing season and a very concentrated harvesting period. The application states: 'The energy crops are sourced from the applicant's own farm and would make minimal contribution to road movements due to short travel distances. These crops displace existing crops, all of which have an off-site transport requirement. Retention of crops will in some cases lead to a reduction of movements compared to current'.

6.19 The NPPF requires local planning authorities to promote agricultural diversification and not to stifle or restrict rural business. Paragraph 28 in particular requires the planning system to 'support sustainable growth and expansion of all types of business and enterprise in rural areas'. The roads converging on St Owen's Cross are busy and witness numerous accidents despite speed restrictions being imposed. However no evidence has been found suggesting accidents are predominantly connected with farm vehicles in general, or Little Pengethley in particular. There is no footway along the B4521, and residents living on this road find it increasingly difficult to get out on foot, including school movements. The Highway Authority is aware of the problems and options are under consideration. A public footpath runs north from near St Owen's Cross up to the A49 near the Gamber entrance, its route going through the Gamber yard. It is not affected by this application, but discussions are under way with regard to a possible formal diversion of the path away from the applicant's farm activities, to enable local people to reach the bus stop on the A49 more quickly and safely than along the road. This has no impact on this particular application, but could provide future improvement for the local community.

6.20 Vehicle movements specifically connected with the AD plant need to be viewed in the relative context of an already busy farming enterprise including the Gamber Produce packing station. The applicant has asserted that actual vehicle numbers would not change significantly, although movement patterns would vary at certain times, with some reductions likely and some seasonal increases. He is aware of the existing highway issues and is willing to engage in dialogue. The Transport Manager has accepted the submitted figures, recommending a requirement for a Traffic Management Plan. If deemed necessary this could entail some improvements to visibility at the junction of the access road with the B4521. The requirements of UDP policies DR3 and T8 would therefore be met.

Water, flood risk and run-off

6.21 The application site lies within Flood Zone 1 (lowest risk, suitable for any development). The operational AD plant area is less than 1 hectare, but the overall area including the yard and silage clamps would be approximately 1.2 hectares. For Zone 1 sites of this size, a Flood Risk Assessment (FRA) is required under Environment Agency guidance and the National Planning Policy Framework (NPPF). The NPPF came into force during the time this proposal has been under consideration. The applicant provided a FRA once its requirement became clear, and the Environment Agency advised that the entire AD site would need to be on an impermeable surface. The FRA found that little surface water run-off is generated towards the site due to the shallow gradient at that point. However, the land slopes to the south-east towards the Luke Brook as it starts its journey south to the Wye. This watercourse is understood to have flooded in recent years, affecting properties on the B4521 nearby. The new impermeable surfacing would generate additional surface water run-off and peak storm flow rates. Acknowledging the risk to the Luke Brook, the application proposes a surface water drainage

strategy in the form of a Sustainable Urban Drainage Solution (SUDS). This would comprise designed drainage for the site, leading to a new detention basin (swale) on adjoining land to the north-east. The basin would be dry for most of the time, only filling during rainfall events, enabling efficient management of surface water from the application site. It would not be a permanent lagoon.

6.22 Rainwater would be captured on site within the bund, and pumped to one or more of the following:

- The digestion tanks
- The reception pit for feedstock mixing prior to entering the digester;
- Into an existing irrigation lagoon
- Finally any surplus would go to the detention basin

The FRA demonstrates the capacity of this system under a series of scenarios ranging from a 1-in-1 year event to a 1-in-100 year storm, plus 20% for climate change. The detention basin or swale would accommodate the run-off, anticipating up to 30cm of water depth in the more frequent occasions, and up to 50 cm depth in extreme events. Final overflow would eventually discharge to the Luke Brook but at a managed rate to prevent flooding of properties from that particular source. The Environment Agency has no objections and the proposed SUDS can be secured by planning condition as the land is adjoining and in the applicant's ownership. The requirements of UDP policies S1, S2, DR2, DR3 and DR7 can be met.

6.23 With regard to a local aquifer, there are no known boreholes within 250 metres of the site. Assurances have been provided by the applicant confirming that all equipment would meet relevant standards to protect groundwater. A leak detection system would be built-in as standard, to provide adequate monitoring of tank performance. These matters would be regulated by the Environment Agency, which is satisfied that the appropriate standards can be met, in accordance with UDP policy DR4.

Odour

6.24 Anaerobic digestion is a sealed process and the plant itself is not subject to odour issues. However some aspects of transfer and storage can lead to odours, and these require adequate management. Large-scale digesters associated with municipal waste treatment, involving food waste from supermarkets and restaurants etc, can sometimes create temporary odour problems relate to handling or air scrubbing equipment, particularly where de-packaging takes place. This is not relevant to the Little Pengethley site as no such process would occur and all the feedstock would be farm-based.

6.25 The application includes an odour assessment which identifies and evaluates local receptors which might be affected, but finds in every case a 'low' or 'very low' risk. In this case, any odours generated would be of a normal agricultural nature; the application includes mitigation as follows:

- All tanks and infrastructure would be sealed units;
- Poultry litter would not be stored on-site but would be brought in for direct loading into the digester on a need basis;
- Litter would only be transported in sheeted or sealed vehicles;
- The AD process removes about 80% of the ammonia content of manure;
- No gas would be vented to atmosphere prior to combustion in the CHP unit;
- Energy crop feedstock would be conventionally stored as for existing silage;
- When spread on land as a fertiliser, digestate has considerably less odour than raw manure, and represents an odour reduction;

6.26 The EA would regulate the site through its Environmental Permit (EP), including a requirement for an odour management plan, provision of which is also recommended in a planning condition. It is accepted there would be an overall net benefit in terms of odour management and no conflict with UDP policies DR4 and DR9.

Noise

6.27 The AD process is not noisy as it is biological and enclosed within the tanks. The gas engine (CHP unit) is the key noise source, but would be housed in an insulated enclosure unit. Noise is also associated with operational movements within the site and from vehicles. The application includes a noise assessment (Noise & Vibration Consultants Ltd, 23 February 2012). The report identifies six nearest receptors at a selection of directions from the plant. These vary from 230 metres to 600 metres distance. Baseline background noise levels were established, observing that these are dominated by local busy roads. The assessment found average daytime background levels at nearest property boundaries to range from 37dB(A) to 42 dB(A) L90 and at night time typically 26-38 dB (A) L90. Daytime operational plant noise is predicted from 32 LAeq dB to a maximum of 38 LAeq dB, with night time levels between 25 and 35 respectively. The report concludes that the proposal is capable of operating within accepted noise levels of 35 decibels at receptor points and recommends mitigation to minimise noise disturbance during both construction and operational phases. Neither the Head of Environmental Health and Trading Standards nor the Environment Agency has expressed any concerns about noise. Noise would also be regulated through the Environmental Permit. Subject to the proposed mitigation scheme being secured, officers consider there would be no conflict with UDP policies S2, DR1, DR2 or DR13.

Health and Safety

6.28 Residents have raised safety concerns, including potential fire or explosion risks, site management, and health. A submitted copy of a Doctor's letter expresses the view that the health of a vulnerable person could be adversely affected if an AD plant were built 'on the doorstep'. The Herefordshire Primary Care Trust was consulted on the application and the letter, (treated as confidential), and has no objections. The movement of poultry litter in particular can disperse bio-aerosols, known to affect health. However, the AD process is an enclosed wet operation and does not generate such particles. Environment Agency advice is that bio-aerosols are relatively heavy and drop to ground at about 250 metres distance from, say, composting sites. The property mentioned in the letter is located 350 metres from the application site, at which distance bio-aerosol levels would be normal. The application states poultry litter would not be stored on site; similar material is already being moved around by a number of farmers in the locality. Dry digestate is spread on fields as fertiliser, but many of the chemical compounds present in the raw material are removed by the AD process and represent less of a risk than spreading raw manure as currently undertaken. Neither the Head of Environmental Health and Trading Standards nor the Environment Agency has expressed any concerns about health. On health issues, officers consider there would be no conflict with UDP policies S2, DR1, DR2 or DR4

6.29 On request, the appointed engineer provided a comprehensive safety overview. This explains the safety precautions built into the proposal, in terms of biogas storage and operational details. A gas flare is included in the proposal. These are essential to any installation, but are only ever used on very rare occasions, for example if a tank needed to be voided of gas for any reason. Day-to-day operation of the plant does not require teams of skilled workers as the process is predominantly automated by computer programmes. CHP units resemble biomass boilers and are becoming common at many industrial and agricultural establishments. There are no concerns about safety, and the Environment Agency would regulate the safe operation of the site through an Environmental Permit

6.30 Objectors have drawn attention to the proximity of high pressure mains in the vicinity. National Grid was consulted, and has no concerns with regard to the location of the proposed plant or to any associated vehicles on the road under which the mains passes.

Air Quality, Pollution prevention

6.31 The applicant has given assurances that all gas would be scrubbed to a set environmental standard before entering the CHP unit engine. Exhaust gases would be monitored and controlled within statutory requirements, and regulated by the Environment Agency through an Environmental Permit. There is no requirement for any routine flare-off except in emergency; the flare is provided as an essential contingency. All digesters and tanks would be sealed and located within a bunded area having 110% capacity of the largest tank to accommodate an entire tank failure. Other aspects of the plant, e.g. silage clamp for crops, would be subject to normal agricultural controls. The site would be regulated by an Environmental Permit under separate legislation and the proposal is considered to be capable of compliance. The Environment Agency has confirmed it has no concerns that a Permit could not be issued. Neither the Head of Environmental Health and Trading Standards nor the Environment Agency has expressed any concerns about air quality or pollution, and there is no conflict with UDP policies S1, S2, DR1, DR4 or DR9.

Conclusion

6.32 Detailed discussions and negotiations have taken place with the applicant, the appointed agent, and consultees in order to find positive solutions to any matters arising. This has taken time, and has resulted in further submissions and consultation periods within which members of the public have been able to make further comments. With the additional material provided, the application covers the aspects required in order to make a proper appraisal. Whilst all the concerns and fears of residents have been considered and addressed in the light of professional consultation responses, the key issue emerging relates to roads and vehicle movements. However this is not solely or predominantly attributable to the applicant's business. The applicant has stated clearly that although patterns might change, as on any farm, overall vehicle numbers would remain stable since the produce from his farm holding is already being transported on the highway. A Traffic Management Plan would be required before commencement of this development, if approved. This and the other aspects discussed above, including surface water drainage, could be secured through planning conditions. The site has been chosen taking account of distance, practical use of generated heat, connection to the grid, visual impact, viability and amenity. The Environment Agency would be the key operational regulator for this plant, not the planning system, through the mechanism of an Environmental Permit. The Agency has no objections in terms of the proposal or its capability of being issued with a Permit. The proposal is therefore recommended for approval.

RECOMMENDATION

That planning permission be granted subject to the following conditions:

1. A01 Time limit for commencement (full permission)

2. B01 Development in accordance with the approved plans

3. The external colour and finish of all parts of the development hereby approved shall be permanently maintained in accordance with details which have first been submitted to and approved in writing by the local planning authority.

Reason: To protect the visual amenities of the area and to comply with the requirements of policy DR1 of the Herefordshire Unitary Development Plan.

4. Within four months of any new hard surface being constructed in connection with the development hereby permitte, the proposed Sustainable Urban Drainage Solution (SUDS) shall be constructed and implemented in accordance with the submitted 'Flood Risk Assessment and Surface Water Drainage Strategy' and the

following plans, all received on 13 September 2012:
• GRE0010/PE-RE10/SuDS 01; SuDS Design 21/8/12
• GRE0010/PE-RE10/SuDS 02: SuDS Cross Section 21/8/12
• GRE0010/PE-RE10/SP 03: AD Plan Cross Section 21/8/12
The provision of the proposed retention basin (swale) shall be incorporated into biodiversity enhancement measures as outlined in the scheme required under condition 6 below, with reference to Biodiversity Action Plan priority species and habitats.

Reason: To provide satisfactory surface water management and drainage, minimise flood risk, and improve biodiversity in accordance with policies S1, S2, DR1, DR4, NC1, NC6, NC7, NC8 and NC9 of the Herefodshire Unitary Development Plan.

5. **Before the development hereby permitted begins, a Traffic Management Plan (TMP) shall be submitted to and approved in writing by the local planning authority. The TMP shall include the following in particular:**

a. Management methodology for vehicles and deliveries during construction of the plant, including working hours and routes to be used;
b. Management methodology for vehicles and movements during operation of the plant, including working hours and routes to be used;
c. An assessment of the existing access to the B4521 having regard to the anticipated additional use and details of any visibility improvements considered necessary;
d. Details of the numbers, types,size and weights of all vehicles to be used in connection with the anaerobic digester;
e. Means of ensuring all delivery drivers accessing the site are fully informed as to road conditions and their responsibilities along the delivery route;
f. Assurances that the TMP shall remain in use throughout the life of the plant;
g. Confirmation that no materials shall be brought to and/or treated in the anaerobic digester hereby permitted unless they have been produced within the applicant's landholding.

The TMP shall be implemented in accordance with the approved details.

Reason: To minimise the impact of vehicles in the interests of highway safety and the potential for traffic intensification in the area, and to conform with the requirements of policy DR3 of the Herefordshire Unitary Development Plan.

6. **Before the development hereby permitted begins, a Landscaping and Habitat Enhancement Scheme for the site and access road shall be submitted to and approved in writing by the local planning authority. The Scheme shall include in particular:**

Soft landscaping:
a. A plan to scale 1:500 or 1:1000 showing the layout of proposed tree, hedge and seeding areas;
b. A written specification clearly describing the species, sizes, densities and planting numbers and giving details of cultivation and other operations associated with plant establishment;
c. Details of specific proposals to provide or enhance wildlife habitats, including an outline of the priority species the scheme is intended to attract, having particular regard for the adopted Biodiversity Action Plan, the improvement of hedgerows and

field margins, and enabling wildlife to take advantage of the retention basin (swale) as part of the SUDS provision;
d. A management plan to ensure after-care of planting and continuity for habitats, for a specified period of at least five years;

Hard landscaping:
e. A plan to show the the position, design and materials of all site enclosures including bunding, fences etc;
f. Details of hard surfacing materials;

The scheme shall be implemented as approved and maintained for the agreed period. During this time, any trees or plants which are removed, die, or are seriously retarded shall be replaced during the next planting season with others of similar sizes and species. If any plants fail more than once they shall continue to be replaced on an annual basis until the end of the after-care period.

Reason: To improve biodiversity and connectivity for wildlife and improve hedgerow, field margin and wetland habitats, in accordance with the requirements of policies S1, S2, S7, DR1, DR4, NC1, NC6, NC7, NC8, NC9 and CF4 of the Herefordshire Unitary Development Plan.

7. **E01 Site investigation - archaeology**

8. **I16 Restriction of hours during construction**

9. **F02 Restriction on hours of delivery**

10. **The development hereby permitted shall not be brought into use unless or until the submitted scheme of noise mitigation and control outlined in report reference R11.1203/DRK (Noise Vibration Consultants Ltd, 23 February 2012) has been implemented in full, having particular regard for sections 7 and 8 of that report. The scheme shall continue to be implemented for the life of the development, subject to any review or amendments as may be deemed necessary in due course.**

Reason: In order to protect the amenity of the occupiers of nearbyproperties and to comply with policies DR13 and CF4 of the Herefordshire Unitary Development Plan.

11. **The development hereby permitted shall not be brought into use unless or until a comprehensive Odour and Environmental Management Plan as set out in paragraphs 5.4, 5.4.1 and 5.4.2 of the submitted Supporting Statement (edited 11 October 2012), has been submitted to and approved in writing by the local planning authority. In addition, the Plan shall include the following in particular:**
a) The appointment of a named qualified and responsible person to oversee implementation of the plan;
b) Operational contingencies for dealing with any abnormal events (e.g. fire, flood, spillage);
c) Production of a working manual for staff, covering all site operations including feedstock handling, digestate handling, gas management and emergency procedures;
d) Provision of a site diary to be kept on site in which day-to-day observations and actions are recorded, including any complaints and responses. The diary shall be made available for inspection by the local authority on request at reasonable times.
The scheme shall be implemented as approved, and shall continue to be implemented for the life of the development, subject to any review or amendments as may be deemed necessary in due course.

Reason: In order to protect the amenity of the occupiers of nearby properties, to prevent pollution and to comply with policies S2, DR1, DR4, DR9, DR13 and CF4 of the Herefordshire Unitary Development Plan.

12. **Within six months of the equipment hereby approved becoming redundant, inoperative or permanently unused, the anaerobic digester and all associated infrastructure shall be removed and re-used, recycled, all materials recovered, or be finally disposed of to an appropriate licensed waste facility, in that order of preference.**

    Reason: To ensure a satisfactory form of development, avoid any eyesore from redundant plant, prevent pollution, and to safeguard the environment when the materials reach the end of their life, in accordance with policies S1, S2, DR1 and CF4 of the Herefordshire Unitary Development Plan.

13. **In connection with the development herby permitted, no poultry litter or manure or waste shall be carried on the public highway unless it is held within a sealed or securely sheeted vehicle.**

    Reason: In the interests of road safety and the amenity of the locality, and to comply with the requirements of policies S2, DR3, DR4, DR9 and T8 of the Herefordshire Unitary Development Plan.

14. **I27 Interception of surface water run off**

15. **I32 Details of floodlighting/external lighting**

16. **I30 Restriction on storage of organic wastes or silage**

Reason for Approval

1. **The proposal has been considered having particular regard to possible adverse effects from vehicle movements, noise, odour and flood risk, along with potential impacts on landscape, visual amenity and health. The principles relating to renewable energy, sustainability and carbon footprint reduction have been taken into account in light of current national policy. Anaerobic digestion is a sustainable renewable energy option for farm effluent that would otherwise be waste. Furthermore, the final residue is a valuable fertiliser from which proportions of the polluting and odorous elements have been removed by the process. Its use on land is regarded as a benefit. The need for renewable energy carries weight provided other factors can be mitigated; the site and the proposal have been assessed with this in mind. Operation of the plant would be regulated by an Environmental Permit issued by the Environment Agency, rather than through the planning system. In light of the above, the proposal is considered to accord with, or be capable of compliance with, policies S1, S2, S6, S7, S11, DR1, DR2, DR3, DR4, DR9, DR13, DR14, T6, T8, LA2, LA6, NC1, NC6, NC8, NC9, ARCH1, ARCH6 and CF4 of the Herefordshire Unitary Development Plan and the National Planning Policy Framework, with particular (but not exclusive) reference to paragraphs 28, 93, 97 98, 186, 187, 196 and 197. The local planning authority has engaged in pro-active and positive negotiation with the applicant, in identifying matters of concern, obtaining further details and clarification as required, and considering proposals offered to address points raised by respondents. As a result, the local planning authority has been able to grant planning permission for acceptable development subject to conditions, in favour of sustainable development as defined in the National Planning Policy framework.**

INFORMATIVES:

1. **The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against planning policy and any other material considerations. Negotiations in respect of matters of concern with the application (as originally submitted) have resulted in amendments to the proposal. As a result, the Local Planning Authority has been able to grant planning permission for an acceptable proposal, in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.**

2. **N11A Wildlife and Countryside Act 1981 (as amended) - Birds**

3. **N11C General**

4. **HN01 Mud on highway**

5 **The applicant is advised to contact the case officer when preparing the details required in addressing the above conditions, to enable liaison with and advice from other departments prior to submission.**

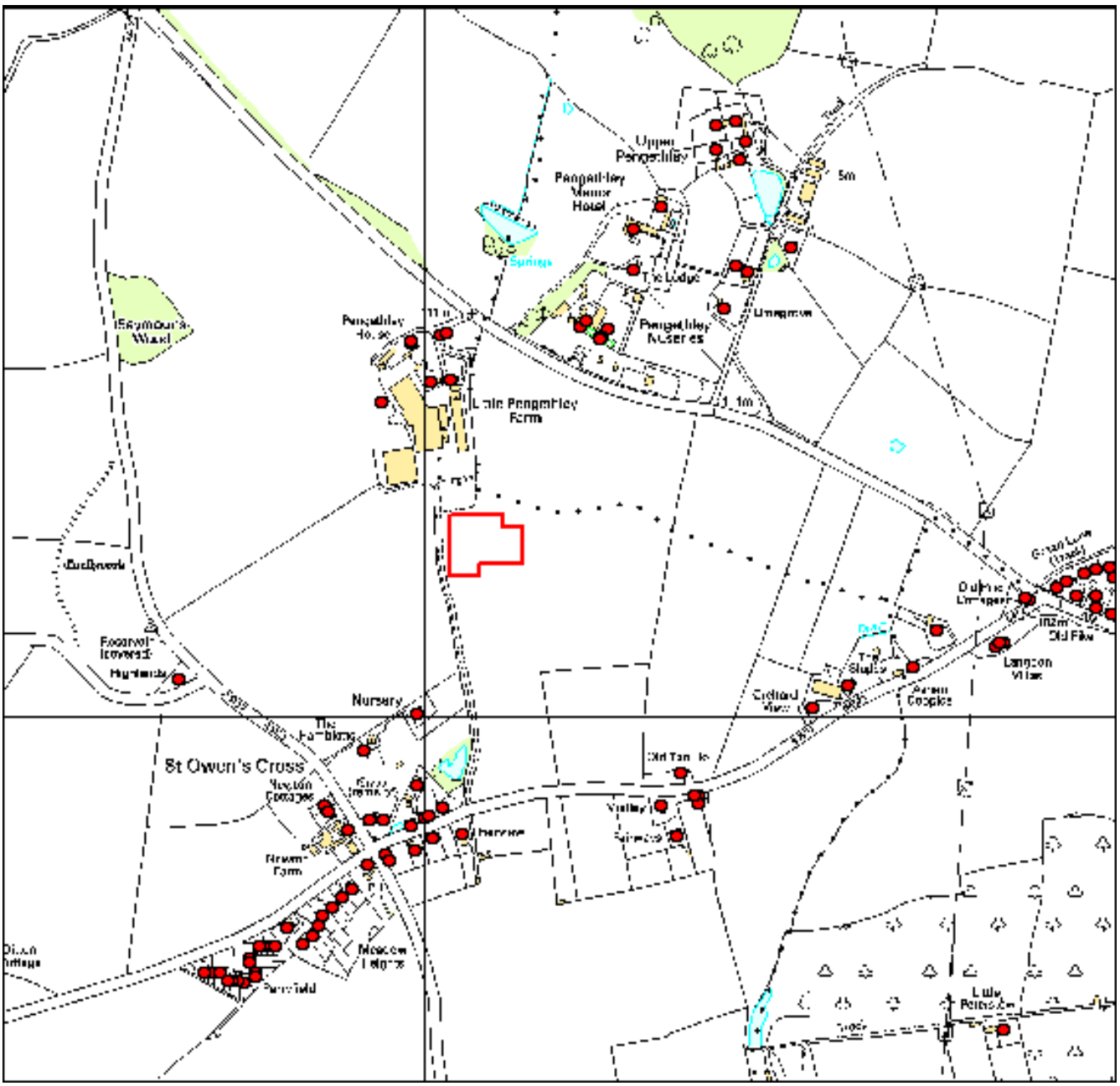
Decision: .....

Notes: .....

.....

Background Papers

Internal departmental consultation replies.



This copy has been produced specifically for Planning purposes. No further copies may be made.

APPLICATION NO: S/121357/N

SITE ADDRESS : LITTLE PENGETHLEY FARM, PETERSTOW, ROSS-ON-WYE, HEREFORDSHIRE, HR9 6NB

Based upon the Ordnance Survey mapping with the permission of the controller of Her Majesty's Stationery Office, © Crown Copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Herefordshire Council. Licence No: 100024168/2005