



Dear

Bredenbury Parish Council are aware that Herefordshire Council intends to introduce additional requirements for planning applications relating to Agricultural development. A document, entitled "Agricultural Development - Supplementary Planning Guidance November 2022" sets out a range of additional requirements which when adopted would become a material consideration for planning applications within the agricultural sector.

The document states **"All planning applications for agricultural development in the River Wye Catchment are required to complete the Farmscoper tool or other suitable assessment process agreed with the local planning authority to demonstrate the phosphorus loading of their development. This should be carried out or verified by a suitably qualified person or company."** It goes on to state that **"Planning permission will not be granted if Phosphorus neutrality cannot be demonstrated."**

It concludes **"If the development will not generate any additional phosphorus loading then the applicant should provide a statement confirming this to be the case."** but it is not clear who or under what authority such a statement would be recognised

We have responded to the consultation to express our concerns as we believe it would be inappropriate to apply this proposal to all planning applications in the Agricultural sector and that it is likely to prove counterproductive if adopted. This is because it would introduce a range of additional costs and unnecessary complexity to applications which are intended to reduce the environmental impact of farming activities. As an example, this could impact on projects supported by DEFRA through their Catchment Sensitive Farming initiative. We believe it is inappropriate to apply the measures set out in the document as the additional requirements could lead to some valuable, environmentally beneficial projects being put on hold or even abandoned.

We believe that you may wish to respond to the consultation directly as it is clear that the greater the number of responses the greater the likelihood that Herefordshire Council will modify the proposal.

Unfortunately, accessing the consultation is somewhat tortuous but you can access the document and the related consultation by clicking on the following link.

<https://consultations.herefordshire.gov.uk/consultations/article/91/agricultural-planning-supplementary-planning-document>.

The consultation period will close on 24th February 2023.

It is clear that the ambition is to address a range of concerns relating to the environmental impact of any agricultural development. While we support the principle we believe that this document should be reviewed and discriminatory measures introduced in order to ensure that any new guidance is only applied only to developments which merit these measures. If this is not done and the current "one size fits all" approach is adopted we believe it would place an unnecessary burden on the farming community and that it is likely to be counterproductive.

Yours sincerely

John Hulse - Chairman, Bredenbury Group Parish Council