

4. DEVELOPMENT REQUIREMENTS

4.1 DESIGN - POLICY DR1 AND PARAGRAPHS 4.4.3 TO 4.4.7A

Objections

W280/1257	Mr R Gill
W323/2842	CTC Right to Ride, Ledbury
P214/458	Mr R Priestley
P711/3065	Mr F Hemming
P769/1913	Cradley Parish Plan Project and Village Design Statement Steering Group
P864/2342	Transport 2000
P865/2415	Cyclists' Touring Club
P917/2634	Camanoe Estates Ltd
P975/11170	Persimmon Homes (South Midlands) Ltd
P975/11172	Persimmon Homes (South Midlands) Ltd
P977/11003	Taylor Woodrow Developments Ltd
P983/2934	Holme Lacy Parish Council
P1068/3244	Cradley Parish Council
P1169/3705	BT PLC (Conditionally Withdrawn)

Summary of Objections / Issues

- A policy referring to the reduction of energy use in buildings should be included. (214)
- Cross reference should be made to Policy DR1 to ensure that proposals involving transport are compatible with Policy S6. (323, 864, 865)
- The words "and could include new buildings, singly, in groups or new settlements" should be added to the end of criterion 1 in Policy DR1. (711)
- Reference to village design statements as a material consideration in planning applications should be included. (280, 769, 1068)
- There should be explicit reference to direct, prioritised walking and cycling routes giving easy access to public transport and local attractors. (864, 865)
- In criterion 1 of Policy DR1, "reflect and enhance" should be replaced with "promote or reinforce." (917, 1169)
- Paragraph 4.4.7a should be revised to define "major development proposals" and types of development in relation to public art requirement; also to delete reference to off-site provision. (975, 977)
- Greater emphasis should be given to design being in keeping with traditional housing. (983)

Inspector's Reasoning and Conclusions

Energy use - 214

4.1.1 Policy S2 was altered in the Revised Deposit Draft to include reference to energy use. The conservation of energy and water is included in criterion 4 of Policy DR1. Additional advice is set out in the supplementary planning guidance "Design and Development Requirements" (Document K 1) referred to in Paragraph 4.4.7. I consider this covers the point satisfactorily and additional specific reference in Policy DR1 is unnecessary.

Village design statements – 280, 769, 1068

4.1.2 Additional reference to village design statements has been included in Paragraph 4.4.7 of the Revised Deposit Draft which states that they will be adopted where they are consistent with planning policies and have benefited from consultation. This approach is generally consistent with advice on the status of supplementary planning guidance and the process by which it can be given weight as a material planning consideration. A village design statement which conflicted with UDP policy would carry little weight.

Cross reference to transport policies and explicit reference to encouragement of modal shift – 323, 864, 865

4.1.3 These issues are satisfactorily addressed elsewhere in the Plan including Policies DR2 and DR3. Paragraphs 4.4.3 and 4.4.11 emphasise the hierarchy of transport modes defined in the Local Transport Plan. Paragraph 4.4.7 refers to additional design advice contained in supplementary planning guidance entitled "Design and Development Requirements" (Document K 1) which encourages the preparation of design statements where these issues can be appropriately addressed in relation to individual proposals. I consider that further cross-referencing is unnecessary.

Design criteria – 711, 917, 1169, 983

4.1.4 The criterion has been amended to read "promote or reinforce" in response to these objections. I do not consider that the suggested reference to "new buildings, singly, or in groups" would add to the thrust of the policy. Where it is appropriate to reinforce local distinctiveness, criterion 1 of the policy would encourage the use of local building styles. Criterion 3 requires development to reflect the context of the site and there is no need for a reference to design being in keeping with traditional housing.

Public arts strategy – 975, 977

4.1.5 Contributions sought by planning obligation or condition are always required to be fairly and reasonably related in scale and kind to the development proposed and reasonable in all other respects. Paragraph 4.4.7a sets out circumstances where contributions to public art would be sought. I consider that this provides satisfactory guidance and does not require further clarification.

RECOMMENDATION

4.1/1 Do not make any modification in response to the objections.

4.2 LAND USE AND ACTIVITY - POLICY DR2 AND PARAGRAPHS 4.4.8 TO 4.4.10

Objections

P44/215	National Farmers' Union
P635/1469	Campaign to Protect Rural England
P864/2343	Transport 2000
P865/2416	Cyclists' Touring Club

Summary of Objections / Issues

- Policy DR2 should reflect the importance of cars in rural areas. (44)
- Criterion 1 of Policy DR2 should be amended to read: "be located and designed to offer good pedestrian access to regular and established public transport services and safe provision for cycling to facilities and employment". (635)
- The importance of walking, cycling and public transport as genuine alternatives to the private car should be emphasised. (864, 865)

Inspector's Reasoning and Conclusions

Transport in rural areas - 44, 635

4.2.1 I consider that the emphasis in the Plan on locating development so as to facilitate a genuine choice of modes of travel accords with national policy. Whilst the car will remain important as a means of transport in the countryside, it would be unsustainable to promote significant development in areas where car use is the only practical option.

4.2.2 I acknowledge the concerns of the CPRE that some of the settlements defined as "main villages" in the housing chapter in practice offer very limited transport alternatives to the use of the private car. Nevertheless, the scale of development proposed for these areas, other than existing commitments, is very limited and reflects the need for some housing provision to be made in the remoter rural parts of Herefordshire as well as to allow some spread of housing provision beyond the towns and larger settlements. I accept that this is a difficult balance to strike but consider that the additional wording proposed would effectively prevent any housing in remoter settlements.

Emphasis on walking, cycling and public transport - 864, 865

4.2.3 These objections are concerned with aspects of transport policy which I consider are satisfactorily addressed elsewhere in the Plan, including Policy DR3. There is no need for further modification to this policy.

RECOMMENDATION

4.2/1 Do not make any modification in response to the objections.

4.3 MOVEMENT – POLICY DR3 AND PARAGRAPHS 4.4.14 TO 4.4.15

Objections

W198/1155	Hereford Civic Society
W323/2843	CTC Right to Ride, Ledbury (Conditionally Withdrawn)
W323/2844	CTC Right to Ride, Ledbury (Conditionally Withdrawn)
W323/2845	CTC Right to Ride, Ledbury
P44/216	National Farmers' Union
P635/1470	Campaign to Protect Rural England (Conditionally Withdrawn)
P783/1942	Hereford Access For All
P830/2218	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P864/2344	Transport 2000
P865/2417	Cyclists' Touring Club
P975/11171	Persimmon Homes (South Midlands) Ltd
P975/11173	Persimmon Homes (South Midlands) Ltd
P977/11005	Taylor Woodrow Developments Ltd
P977/11006	Taylor Woodrow Developments Ltd
P1058/3194	Eaton Bishop Parish Council (Conditionally Withdrawn)

Summary of Objections / Issues

- The penultimate criterion of Policy DR3 should be amended to refer to “local and trunk road network.” (198)
- Paragraph 4.4.14 should be amended to refer to the impact on “trunk or local road network”; also to reflect the graduated approach set out in Circular 04/2001. (975, 977)
- Criterion 2 of Policy DR3 if strictly applied would prevent any development away from bus routes in rural areas. The requirements of Policy DR3 are unrealistic and unworkable in rural areas. (44, 1058)
- Reference should be made to the user hierarchy. The needs of non-car users in design matters should be prioritised. (323, 864, 865)
- The policy should be strengthened in respect of access for all, including parking provision, urban and rural access design and dropped kerbs. (783)
- In criterion 1 of Policy DR3, “minimum standards” should be defined or reference made to the need to seek agreement. (975, 977)

Inspector's Reasoning and Conclusions

Clarification on local and trunk roads – 198, 975, 977

4.3.1 Amendments to Paragraph 4.4.14 were included in the Revised Deposit Draft to clarify the intent of the Plan as regards trunk roads. The Council has proposed a further change (Proposed Change No 4) to make clear that mitigation measures would be required for any development likely to have a material effect on either or both the trunk and local road network. I consider that the amendments and the proposed change meet the objections.

Rural areas – 44

4.3.2 I consider that the emphasis in the Plan on locating development so as to facilitate a genuine choice of modes of travel accords with national policy. Whilst

the car will remain important as a means of transport in the countryside, it would be unsustainable to promote significant development in areas where car use is the only practical option. Paragraph 4.4.12 recognises that some flexibility in approach may be necessary in remoter areas.

Needs of non-car users and people with disabilities – 323, 864, 865, 783

4.3.3 Reference to the user hierarchy was included in Paragraph 4.4.11 of the Revised Deposit Draft and Paragraph 4.2.22 was changed to refer to “high-quality” accessibility. I consider that, taken together, the relevant policies of the UDP deal with the needs of non-car users in a satisfactory manner. Criterion 1 of Policy DR3 has been revised to emphasise the needs of people with disabilities. In my opinion, it would be inappropriate to include more detailed reference, for example, to the provision of dropped kerbs.

Definition of “minimum standards” – 975, 977

4.3.4 I do not consider that the phrase “satisfying minimum design standards”, which was included in the policy at revised deposit stage, adds anything to the clarity of understanding of the policy. I consider it should be deleted.

Other objections - 323, 635, 830, 1058

4.3.5 The Revised Deposit Draft includes changes to Paragraphs 4.4.11, 4.4.14, 4.4.15, 4.4.16 and Policy DR3 which satisfy these objections.

RECOMMENDATIONS

4.3/1 Modify the Plan in accordance with Proposed Change No 4.

4.3/2 Modify Policy DR3 by deleting the phrase “satisfying minimum design standards and” from criterion 1.

4.3/3 Do not make any other modification in response to the objections.

4.4 ENVIRONMENT - POLICY DR4 AND PARAGRAPH 4.4.22

Objections

W323/2827	CTC Right to Ride, Ledbury
P743/1799	Ledbury Town Council
P864/2345	Transport 2000
P865/2418	Cyclists' Touring Club
P1071/3270	English Nature (Conditionally Withdrawn)
P1082/3334	Mr R L Evans

Summary of Objections / Issues

- Policy DR4 should be strengthened to resist development which would have a negative environmental impact. Use of the term “significant” is ambiguous. (323)
- Criterion 5 of Policy DR4 should read “retain and safeguard local open spaces, also open spaces included as part of new and future residential development plans.” (743)

- Reference to environmental benefits of cycling should be included. (864, 865)
- There is no safeguarding of ponds as distinct from pools. (1082)

Inspector's Reasoning and Conclusions

Ambiguity – 323

4.4.1 Whilst there is always scope for interpretation as to what is “significant”, I consider that the policy pays satisfactory attention to the need to minimise environmental impact. The requirement that services should be able to be provided without significant environmental impact is a demanding test. I consider the attempt to introduce greater precision is unlikely to be fruitful.

Other objections – 357, 743, 864, 865, 1071, 1082

4.4.2 The protection of open space is satisfactorily addressed in Policies S8 and RST4. Provision for cycling is covered in other policies of the Plan particularly those in Chapter 8 (Transport) which implicitly recognise its benefits.

4.4.3 The policy already encourages the protection, enhancement and restoration of biodiversity and includes specific reference to ponds in Paragraph 4.2.2. Changes have been made in the Revised Deposit Draft which have enabled objectors 357 and 1071 to conditionally withdraw their objections. I do not consider it is necessary to make any further modifications to the Plan in response to these objections.

RECOMMENDATION

4.4/1 Do not make any modification in response to the objections.

4.5 PLANNING OBLIGATIONS - POLICY DR5

Objections

W323/4931	CTC Right to Ride (Ledbury)
P415/862	Crest Strategic Projects Ltd
P734/1774	R B Kilvert
P743/6645	Ledbury Town Council
P790/1974	West Midlands RSL Planning Consortium
P809/2085	Hereford and Worcester Chamber of Commerce
P864/2347	Transport 2000
P865/2419	Cyclists' Touring Club
P1193/3779	Collier & Brain Ltd

Summary of Objections / Issues

- Reference to transport benefits should be included. (323, 864, 865)
- The policy should be amended to ensure compliance with Circular 1/97. The policy has unrealistic expectations of what developers can afford to contribute. It fails to address circumstances where benefit could be secured by conditions. (415, 1193, 809)

- After “proposed development” insert “particularly in areas where recreational facilities are inadequate and especially in areas of local social deprivation.” (734)
- Temporary classrooms at Ledbury Primary School should be replaced with permanent classrooms. (743)
- Affordable housing must be regarded as a planning gain in itself. (790)

Inspector's Reasoning and Conclusions

Compliance with Circular 1/97 – 415, 1193, 809

4.5.1 Paragraph 4.4.25 sets out the principles to be applied to planning obligations in accordance with the advice in Circular 1/97 (subsequently superseded by Circular 05/2005). The requirement to satisfy the tests of relevance, reasonableness and proportionality provides satisfactory safeguards to ensure that any benefits sought are not excessive in relation to the development proposed. Reference to the use of conditions was included in Paragraph 4.4.24 at the revised deposit stage.

4.5.2 I consider that no further modification is required in respect of these objections although reference in the Plan should be updated to take account of the new circular.

Other objections - 323, 864, 865, 734, 790, 743

4.5.3 A reference to transport benefits was included in the Revised Deposit Draft which satisfies these objections. I consider that it is unnecessary to include specific reference to social deprivation, recreational facilities and affordable housing. These and other circumstances where it may be appropriate to seek benefits through planning obligations are included in the term “community benefits”.

4.5.4 With regard to quantification of the benefits which may be sought, I do not consider that it is necessary to attempt this in the context of a general policy. Indications of the scale and type of benefit are included where appropriate in relation to specific allocations. Where development comes forward on unallocated sites, the scope for benefits to be achieved through obligations will have to be determined on a case by case basis in the context of what is acceptable in relation to the circular. As regards Mr Kilvert’s and Ledbury Town Council’s objections, it is not appropriate to identify specific cases in a general policy.

RECOMMENDATIONS

4.5/1 Update the Plan by referring throughout to Circular 05/2005.

4.5/2 Do not make any other modification in response to the objections.

4.6 WATER RESOURCES - POLICY DR6 AND PARAGRAPHS 4.5.3 TO 4.5.4

Objections

P358/747 Environment Agency
W463/7333 Ross-on-Wye Town Council

Summary of Objections / Issues

- A sentence referring to the Agency's policy on groundwater should be included in Paragraph 4.5.4. (358)
- Improvements to sewage treatment and disposal system should be made before development is permitted. (463)

Inspector's Reasoning and Conclusions

Effects on groundwater and sewage treatment – 358, 463

4.6.1 Paragraph 4.5.3 gives sufficient recognition to the sensitivity of groundwater. Paragraph 4.5.4 and Policy DR6 are framed so as to resist development taking place in advance of necessary improvements to sewage treatment works. I consider that no further modifications are needed to Paragraph 4.5.4 or Policy DR6.

RECOMMENDATION

4.6/1 Do not make any modification in response to the objections.

4.7 FLOOD RISK - POLICY DR7 AND PARAGRAPHS 4.5.7 TO 4.5.9

Objections

P44/10045 National Farmers' Union
P217/11290 Walford Parish Council
P358/780 Environment Agency (Conditionally Withdrawn)
P358/11614 Environment Agency (Conditionally Withdrawn)
P426/888 B R Edwards
P809/2087 Hereford and Worcester Chamber of Commerce
P832/2168 Co-operative Group
P846/2227 Country Land & Business Association
P890/2595 Government Office for the West Midlands
P959/2778 Hereford City Partnership Ltd
P975/11174 Persimmon Homes (South Midlands) Ltd
P1102/3512 H P Bulmer Ltd
P1102/10789 H P Bulmer Ltd
P1107/3537 H P Bulmer Ltd & Jennings Estates Ltd
P1107/10795 H P Bulmer Ltd & Jennings Estates Ltd
P1122/3615 Mr B Richardson

Objections to Proposed Changes

W198/20126 Hereford Civic Society
P390/20116 The Moor Estate

Summary of Objections / Issues

- The policy would prevent development on massive areas of land. (44)
- Development should not proceed in the identified flood risk area at Coughton. (217)
- If a proposal satisfies criterion 2 of Policy DR7, it is unnecessary to also comply with criterion 1. (809)
- An additional requirement for remedial work to localised flood risk areas and upgrading of foul drainage systems should be included. (426)
- The policy should be amended to allow redevelopment of previously developed land and the re-use of existing structures in flood risk areas. (832, 846)
- The policy should be more compliant with the flood risk approach in PPG 25. (890)
- Use of the term “reasonable” is ambiguous. (959)
- Land at Ross-on-Wye shown as liable to flood is both indicative and shown at its extreme. (975)
- Criterion 1 makes no allowance for mitigation. The final paragraph is too restrictive as to uses which may be acceptable in the flood plain if mitigation can be achieved. (1102, 1107)
- The wording of criterion 5 should be revised to allow greater flexibility. (1102)
- The UDP does not address the danger of severe flooding due to climate change. The UDP should actively promote schemes for dealing with the run-off from the whole water catchment, and not simply areas of defined flood risk, by absorbing rain where it falls as far as possible. A change is required in agricultural practice to avoid compaction of soils, use of permeable pavings and increase in planting of vegetation to absorb water and diminish run-off. Policy DR7 should be amended to include in the title “Diminishing and dealing with flood risk”. Explanatory material should provide that “development proposals shall wherever possible be linked to land management schemes which diminish storm water run-off by increasing vegetative cover and other appropriate methods.” (1122)

Inspector's Reasoning and Conclusions

Approach to flood risk – 44, 198, 390, 358, 832, 846, 890, 975, 1102, 1107

4.7.1 Concerns over flood risk have a high profile in the national planning agenda. The Revised Deposit Draft has been substantially modified in response to objections to reflect the guidance in PPG 25. Revised Policy DR7 introduces a sequential test for the development of land in accordance with PPG 25 which allowed the Environment Agency and the Government Office for the West Midlands to conditionally withdraw their original objections. I consider that the revised

policy broadly reflects the importance accorded to flood risk considerations in national policy guidance.

4.7.2 In addition to the substantial changes included at the revised deposit stage, the Council published further proposed changes in December 2004.

4.7.3 The Environment Agency has provided indicative flood plain maps to assist local authorities in the assessment of development proposals. The information on the Proposals Maps shows areas in the highest risk category (ie those with a 1% annual probability of recurrence).

4.7.4 The Council acknowledges that the information shown on the Proposals Maps is indicative and may be refined when a flood risk assessment is undertaken. This is made clear in the Plan at Paragraph 4.5.6. Proposed Change No 6 is intended to allow additional relevant information to be taken into account in the assessment of risk. This represents a pragmatic approach and I consider it helps to allay the fears of objectors that sites might be sterilised unnecessarily. I support the proposed change.

4.7.5 A study of proposed allocations entitled PPG 25 Flood Risk Sequential Test – UDP Allocations (June 2003) was prepared which reviewed allocations in the light of available flood risk data. As a consequence some proposals were deleted.

4.7.6 Whilst the Environment Agency is satisfied that Policy DR7 reflects PPG 25 for development control purposes, it objected to the Revised Deposit Draft seeking the inclusion of a policy which sets out a sequential approach to the release of allocated sites. I have considered this objection under the Development Strategy at Section 3.14 of my report above. No modification of the Plan is necessary.

4.7.7 Proposed Changes Nos 5 and 7 have been agreed by the Council in response to an objection by the Environment Agency which has enabled the conditional withdrawal of Objection P358/11614. Proposed Change No 5 recognises that a flood risk assessment may be needed on sites which lie outside the areas of highest risk, depending on local circumstances. Proposed Change No 7, which clarifies the position that dry access is only a requirement for residential development, has given rise to two further objections (W198/20126 and P390/20116). However, I consider the proposed change accurately reflects the advice in PPG 25 as regards the need for dry access. I support the proposed changes.

4.7.8 Many of the objectors are concerned that the policy will inhibit or prevent development on substantial areas of land including sites which are otherwise sustainably located in relation to existing settlements. I deal with site specific objections in the appropriate sections below. Whilst I understand the concerns of objectors who seek a more flexible approach to development in flood plains, the adoption of a sequential approach is in accordance with national guidance. It is appropriate that proposals for development in high risk zones are subject to the closest scrutiny to ensure that any development which may be acceptable does not create new problems or exacerbate existing conditions.

4.7.9 The Revised Deposit Draft recognises, however, that other sustainability considerations, including the priority given to urban regeneration and the re-use of previously developed land and buildings, have to be weighed in considering the suitability of particular sites for development. Within the areas defined on the Proposals Maps, there may be areas where development is acceptable or can be made so through mitigation. The possibility of providing mitigation through flood

defences is referred to in Paragraph 4.5.7a. Flood risk assessments will be required to demonstrate this in relation to particular sites. I consider that the revised policy satisfactorily addresses these concerns without diluting the overall thrust of the policy.

Land at Ross-on-Wye - 975

4.7.10 My general conclusions on the approach to flood risk, as discussed above, apply equally to land at Ross-on-Wye. In this case, the latest situation is shown on Map PC9 to which Proposed Change No 24 refers. This proposed change is recommended. At the inquiry, the objector acknowledged that the proposed change would meet the objection. No additional action is necessary.

Development at Coughton – 217

4.7.11 It is not appropriate to address site specific issues in a general policy. As a matter of fact, planning permission has been granted on the site to which the Parish Council refers and updated information provided by the Environment Agency indicates that the land is not at risk of flooding.

Duty to carry out remedial work - 426

4.7.12 It is appropriate in a land use plan to set out improvements to drainage infrastructure which need to be carried out before development is allowed to proceed. However, it is not a vehicle for requiring public authorities to undertake works to rectify localised deficiencies. Operating authorities have permissive powers but not a duty to carry out flood defence works in the public interest. Requirements to upgrade foul sewage systems may arise from water quality concerns, but that would fall under other legislative regimes.

Catchment-wide issues - 1122

4.7.13 The Council acknowledges the objector's concerns, which are recognised in Paragraph 4.5.5. Paragraph 4.5.11 has been revised to refer to changes in farming practice and other land management issues which can have a major influence on the ability of land to absorb and store rainfall and protect against flooding.

4.7.14 In response to the objection, I consider the Council fairly recognises that many of these issues, though of real concern, are beyond the scope of the UDP to influence. Policy DR4 supports the use of sustainable drainage techniques wherever possible in land use proposals and supplementary planning guidance "Design and Development Requirements" provides further detailed advice. Whilst the aim is laudable, I do not consider that amending the policy as proposed by the objector would have any significant practical effect.

Other objections – 809, 959

4.7.15 The policy has been substantially revised to accord with national policy on flood risk. Objection P809/2595 is, therefore, no longer directly relevant. The requirement to demonstrate that there are no reasonable alternative locations available on land of a lower flood risk is taken directly from PPG 25. Whilst there is always some scope for interpretation as to what is and is not reasonable, the wording reflects Paragraph 30 of PPG 25 and I consider that the search for greater precision is likely to be unrewarding.

RECOMMENDATIONS

4.7/1 Modify the Plan in accordance with Proposed Change Nos 5, 6 and 7.

4.7/2 Modify the Plan in accordance with Proposed Change No 24 (except insofar as it relates to Ewyas Harold – see Section 17.18).

4.7/3 Do not make any other modification in response to the objections.

4.8 CONTAMINATED LAND - POLICY DR10 AND PARAGRAPH 4.5.23

Objection

P358/749 Environment Agency

Summary of Objection / Issue

- Further detail should be included, including examples, to assist developers in assessing human health risks in relation to contaminated land. (358)

Inspector's Reasoning and Conclusions

4.8.1 I consider that the policy provides a satisfactory framework for the consideration of contaminated land. Detailed advice on such matters is set out in PPS 23 and it is unnecessary to include it in the UDP.

RECOMMENDATION

4.8/1 Do not make any modification in response to the objection.

4.9 NOISE – POLICY DR13

Objection

P846/2228 Country Land & Business Association

Summary of Objection / Issue

- Whether the policy places an unnecessary restriction on rural businesses. (846)

Inspector's Reasoning and Conclusions

Restriction on rural businesses - 846

4.9.1 The impact of noise is a particular issue in areas which are otherwise relatively tranquil. I consider it is reasonable to make particular reference to designated areas and the wider countryside.

RECOMMENDATION

4.9/1 Do not make any modification in response to the objection.

4.10 LIGHTING - POLICY DR14

Objections

W280/500188 Mr R Gill
W323/2848 CTC Right to Ride, Ledbury (Conditionally Withdrawn)

Summary of Objections / Issues

- The phrase “whilst simultaneously minimising the light pollution incurred” should be added.” (280)
- The policy should include items that require the provision of adequate lighting on, for example, pedestrian and cycle paths. (323)

Inspector's Reasoning and Conclusions

Both objections

4.10.1 The Revised Deposit Draft includes an amendment to Policy DR14 which enabled Objector 323 to conditionally withdraw the objection. I consider that Objector 280’s concerns are satisfactorily addressed through criteria 1 to 4 of the policy and no further modification is necessary.

RECOMMENDATION

4.10/1 Do not make any modification in response to the objections.

4.11 SUPPLEMENTARY PLANNING GUIDANCE – PARAGRAPHS 4.6.1 TO 4.6.4

Objections

W280/500189 Mr R Gill
P1068/500132 Cradley Parish Council

Summary of Objections / Issues

- The words “and so treated as a material consideration in planning matters” should be reinstated. (280, 1068)

Inspector's Reasoning and Conclusions

Reinstatement of deleted words – 280, 1068

4.11.1 Additional reference to village design statements was included in Paragraph 4.4.7 of the Revised Deposit Draft which states that they will be adopted where they are consistent with planning policies and have benefited from consultation. This approach is generally consistent with advice on the status of supplementary planning guidance and the process by which it can be given weight as a material planning consideration. I consider that the wording of Paragraphs 4.6.3 and 4.6.4 deals with this issue satisfactorily.

RECOMMENDATION

4.11/1 Do not make any modification in response to the objections.