

6. EMPLOYMENT

6.1 ROTHERWAS INDUSTRIAL ESTATE - POLICY E1 AND PARAGRAPHS 6.4.2 TO 6.4.5

Objections

P635/1536	Campaign to Protect Rural England
P635/11436	Campaign to Protect Rural England
P864/2355	Transport 2000
P898/2549	Herefordshire Green Party
P356/674	Mr J V Harding
P1156/3672	Mr J B Nash

Summary of Objections / Issues

- The release of the land at the Rotherwas Industrial Estate is premature. (635)
- The release of further land at Rotherwas is seriously questioned. (635)
- The sustainability of the site for major employment development is questioned. (864)
- The unrealistic hope factor of further developments of the site should be removed. (898)
- There are better places for industrial development. (356)
- There should be provision for the Council to set a really good example of land management. (1156)

Inspector's Reasoning and Conclusions

Premature release of land - 635

6.1.1 In Section 3 of my report, I conclude that the Council is seeking to allocate too much employment land. In this regard, I review below the appropriateness of the allocations at Rotherwas. In my opinion, Rotherwas has a continuing part to play in helping to meet the employment land needs of the county. To this extent, I do not consider that policy E1 should be withdrawn. However, I am of the opinion that the Plan allocates more land at Rotherwas than is necessary. The allocations should be reduced as recommended below. Without adequate justification, the release of more land than is necessary would be premature.

Questioning the release of further land - 635

6.1.2 The objector is questioning the cost-effectiveness of further development at Rotherwas in the light of flooding and access constraints and, as such, the sense of making further employment allocations. In the light of other objections, I am recommending reductions to the allocations at the industrial estate. Development of the land that I envisage would be allocated would not be dependent upon flood

defence works or the construction of a new access road although there would be secondary benefits in this regard.

Sustainability of the site for major employment development - 864

6.1.3 I appreciate that the Rotherwas Industrial Estate is in a somewhat peripheral location on the southeastern boundary of the city. Nevertheless, I do not consider that it is an unsustainable location such that further employment allocations should be precluded or other uses introduced instead. The area is reasonably accessible by cycle and there are scheduled improvements to the infrastructure for both cyclists and pedestrians. In addition, the estate is served by two regular bus services. Further, sustainability is promoted through the Rotherwas Travel Plan and the activities of the Travel Plan Co-ordinator. No modification of the Plan is necessary.

Unrealistic hope factor of further developments - 898

6.1.4 I have already noted that the Plan allocates too much new employment land. In this regard, the 15 ha of land confirmed as suitable for B1 employment purposes under Policy E1 is part of that over-provision. However, recognising that the Rotherwas Industrial Estate has a continuing role to play in helping to meet the future employment land requirements of the county, I have considered what would be a more realistic allocation at Rotherwas.

6.1.5 In my opinion, the allocations should be restricted to the land that is essentially unconstrained. In this regard, there are four parcels of land that should be removed from the list set out in Policy E1. The first is land at Chapel Road. This is described in the Flood Management Strategy (Document N 8) as fully enclosed within the flood boundary and "unlikely to be viable for development because of the difficulty of providing a flood free access."

6.1.6 The other three parcels are known as land west of Coldnose Road; land east of Coldnose Road; and land north of Holme Lacy Road. These are partially within the flood boundary. Their development would be dependent upon the provision of compensatory storage. I do not consider that it makes sense to consider compensatory storage in circumstances where the total allocation is unjustified.

6.1.7 The four parcels together have a total area of 7.1 ha. I recommend that they are removed from Policy E1 such that the remaining allocation would be 7.9 ha. In addition, I recommend that the reference to the identification in the South Herefordshire District Local Plan of over 56 ha of employment land at Rotherwas should be omitted from Paragraph 6.4.2. To my mind, this reference infers a potential that cannot be justified on the basis of realistic demand figures. The Plan should be modified to this extent.

Better places for industrial development - 356

6.1.8 In the light of the location of Rotherwas in the Wye flood plain, and on the assumption that millions of pounds are to be spent on road access and housing estates, the objector suggests that there are better places for industrial development. However, the allocations that I envisage would not be dependent upon such expenditure. No related modification of the Plan is necessary.

Provision for land management by the Council - 1156

6.1.9 Property management, whether by the Council or by other owners, is not an appropriate matter for inclusion in the development plan. No modification is necessary.

RECOMMENDATIONS

6.1/1 In Policy E1, remove reference to the following sites: Land west of Coldnose Road; land east of Coldnose Road; land at Chapel Road; and land north of Holme Lacy Road. Change the area total to 7.9 ha.

6.1/2 For the second sentence of Paragraph 6.4.2, and the first word of the third sentence, substitute the following: "Constraints on development ...".

6.1/3 Do not make any other modification in response to the objections.

6.2 MORETON ON LUGG DEPOT, MORETON ON LUGG - POLICY E2 AND PARAGRAPH 6.4.12

Objections

P635/1537 Campaign to Protect Rural England
P1156/3675 Mr J B Nash

Summary of Objections / Issues

- The uses should be sustainable; the release of land should be phased in relation to need; and the amounts of land to be made available should be stated. (635)
- The depot should be considered as a potential site for a relocated Hereford cattle market. (1156)

Inspector's Reasoning and Conclusions

Sustainability, phasing and amounts of land - 635

6.2.1 No justification has been provided in support of the objector's specific suggestions. However, I note the availability of rail access and the potential for sustainable uses. In other respects, and given the flexibility within the policy, it is not possible to specify exact figures for the amount of land available to develop. However, the text supporting the policy provides some indicative figures and no modification of the Plan is necessary.

Relocated Hereford cattle market - 1156

6.2.2 The depot could be considered as a potential site for Hereford's livestock market under Policy TCR19R. In this regard, there is no need for a proposal specific to Moreton on Lugg.

RECOMMENDATION

6.2/1 Do not make any modification in response to the objections.

6.3 EMPLOYMENT LAND ALLOCATIONS - POLICY E3

Objections

P890/2528	Government Office for the West Midlands
P987/2949	Scott Newman Group
P42/200	Mr C A Petrie (Conditionally Withdrawn)
P918/2636	Messrs R and G Stevens
P991/2963	E Coombs and M Freeman

Summary of Objections / Issues

- The policy should not refer to confirmed local plan employment land allocations. (890)
- Objection is raised to the terms of Policy E3. (987, 918, 991)
- The "use class" details are not clearly published with this policy. (42)

Inspector's Reasoning and Conclusions

Reference to confirmed local plan employment land allocations - 890

6.3.1 In the Revised Deposit Draft, the former Policy E3 with its reference to confirmed local plan employment allocations has been dropped. The replacement policy refers to "other" employment land allocations. The objection has been met and no modification of the Plan is necessary.

Objection to the terms of Policy E3 – 987, 918, 991

6.3.2 With regard to these three objections, all made at the first deposit stage, the agent's comments state that an objection is made to the terms of Policy E3. However, no further details have been given and there is inadequate justification for any modification of the Plan.

Use class details - 42

6.3.3 Details of use classes are set out in the Town and Country Planning (Use Classes) Order 1987, as amended. There is no need for them to be repeated in the Plan. The Government usually consults on amendments to the Order. I would not expect there to be arbitrary changes that would affect adjacent property owners. The objection has been conditionally withdrawn and no modification of the Plan is necessary.

RECOMMENDATION

6.3/1 Do not make any modification in response to the objections.

6.4 EMPLOYMENT LAND ALLOCATIONS – POLICY E3 AND PARAGRAPH 6.4.19 - BROMYARD - PORTHOUSE FARM

Objection

P520/10735 Bromyard and Winslow Town Council

Summary of Objection / Issue

- Insufficient industrial land has been allocated at Bromyard. (520)

Inspector's Reasoning and Conclusions

Industrial land at Bromyard - 520

6.4.1 The objection of Bromyard and Winslow Town Council, which dates from the revised deposit stage, indicates that the industrial land allocation in Bromyard is derisory. The Town Council would wish the allocation for industrial purposes of the land north of Porthouse Farm Industrial Estate to be reinstated.

6.4.2 In this regard, I note that 5.2 ha of land at the Linton Trading Estate have been allocated in the Revised Deposit Draft. This compares with the original allocation of 2.4 ha at Porthouse Farm. I also note that there are no formal site specific objections to the proposed allocation at the Linton Trading Estate. As such, I would expect this allocation to be carried forward into the adopted UDP. Be that as it may, I have considered whether there is a case for reinstating the allocation north of Porthouse Farm.

6.4.3 It appears to me that the main reason for wishing to see an employment allocation north of Porthouse Farm is because the alternative of housing development is perceived as incompatible with existing and possible future industrial activities on the present industrial estate. These matters are considered in relation to the housing objections. In addition, it is stated that there would be no major infrastructure requirements other than the industrial relief road.

6.4.4 For my part, and bearing in mind the proposed provision at the Linton Trading Estate, I do not consider that there is adequate justification for a reversal of the provisions of the Plan. Whilst employment would be an acceptable land use on the objection site, there is no significant evidence to suggest that the allocation is needed in either quantitative or qualitative terms. The absence of programmed access improvements also militates against allocation. I have concluded that no modification of the Plan is appropriate.

RECOMMENDATION

6.4/1 Do not make any modification in response to the objection.

6.5 EMPLOYMENT LAND ALLOCATIONS - POLICY E3 AND PARAGRAPH 6.4.20 – KINGTON - HATTON GARDENS AND LAND NORTH OF B4355

Objections

P1071/3286	English Nature (Conditionally Withdrawn)
P535/1164	Kington Town Council
P535/10393	Kington Town Council
P635/11437	Campaign to Protect Rural England
RP1362/10317	Kington Area Regeneration Partnership
RP1368/10343	Kington Building Supplies Ltd
RP1392/10398	Kington Rural and Lower Harpton Group Parish Council
RP1410/10417	Simpson Drew
RP1488/10903	MELT Analysis
P122/316	Mr B T Trumper
P122/10422	Mr B T Trumper
W321/938	Mrs E Newman
W321/10344	Mrs E Newman
W321/10345	Mrs E Newman
RP1363/10318	Mr A Edwards
RP1364/10319	Mrs E Edwards
RP1366/10342	Mr T C L Hall (Conditionally withdrawn)
RP1369/10346	Mr A D Price
RP1397/10404	Mrs R Bradbury
RP1402/10409	Mr E O Davies
RP1407/10415	Mr J Mayglothling
RP1411/10419	Mrs M M Branston
RP1427/10486	Dr S S White
RP1433/10555	M C Sargeant
RP1474/10716	Mr M and Mrs J Morgan
RP1487/10902	Mr A Gealy
RP1513/11605	Owners of Glengarth

Objection to Proposed Change

P122/20131 Mr B T Trumper

Summary of Objections / Issue

- How the employment needs of Kington can best be accommodated. (All objectors)

Inspector's Reasoning and Conclusions

Meeting the employment needs of Kington – all objectors

6.5.1 The employment needs of Kington have been examined in a report "Kington Employment Land Site Search" (Document N 9). This concludes that an allocation of some 1.25 ha of employment land for the development of B1, B2 and B8 industrial premises should be sufficient for the needs of the town. In addition, land further outside the town, say at Hergest Camp, should remain allocated for low-

value, small scale development. The demand for small offices could be met by the conversion of existing buildings within the town centre.

6.5.2 In addition to the above, certain objectors have suggested that Kington should have a greater role with the allocation of more employment land. The need for live-work units and for a lorry park has also been identified.

6.5.3 For my part, I would expect the allocation of land suitable for the construction of small industrial units to be the main priority. In this regard, any demand for live-units could be satisfied on land other than allocated employment land. Similarly, given that suitable employment land is likely to be at a premium, I would expect the allocation of sufficient employment land to take precedence over the identification of land suitable for lorry parking.

6.5.4 The Council's proposals have been in a state of flux. In the Deposit Draft Plan, the town's requirements were to have been met by an allocation south of the present industrial estate at Hatton Gardens. However, in the face of perceived problems over flooding, the Council switched to the allocation of 2.40 ha of land north of the B4355 in the Revised Deposit Draft. This proposed allocation has, in turn, been reduced to 0.85 ha under Proposed Change No 8. In order to limit the greenfield land-take, the allocation would be restricted to the land west of Barton Lane.

6.5.5 On a preliminary point, I would say that certain specific objections in respect of the initial Hatton Gardens allocation have been overtaken by the switch to an allocation north of the B4355. However, the reduction of this allocation from 2.40 ha to 0.85 ha has not placated objectors. There is considerable objection to the smaller site. In addition, the necessity to allocate this site has been questioned bearing in mind the potential contribution from Hergest Camp, Hatton Gardens and other sites in Kington; also from industrial estates at Leominster and Presteigne. In this regard, I would expect appropriate provision to be made within or around Kington. As such, I consider below the various local opportunities.

6.5.6 Hergest Camp and the Hatton Gardens Industrial Estates are both existing employment areas that are protected under Policy E5. In my opinion, opportunities at these locations should be examined ahead of any allocation on a greenfield site such as that north of the B4355. In this regard, and as indicated below, I have rejected additional options at Banley Farm and on land adjacent to the A4111.

6.5.7 Hergest Camp is not in an ideal location. It is located in the open countryside beyond Kington a little way to the southwest of the town. In addition, the connections with Kington and with the outside world are along minor roads. Nevertheless, and despite an image problem, the camp has considerable potential for development.

6.5.8 There are a large number of empty former camp buildings in various states of repair. Some of these appear to be available for occupation or could be re-clad and brought into productive use as has been done elsewhere on the camp. Others could be redeveloped and units of a variety of sizes provided. Yet more opportunities are provided by open land within the curtilage of the protected employment area.

6.5.9 My conclusion on Hergest Camp is that it provides an important potential employment resource. Although the circumstances are not ideal, it is relatively close to Kington and could help meet the on-going employment needs of the town.

Its presence takes pressure off the need to make a full allocation of employment land within Kington itself. Indeed, in my opinion, the potential of the camp has been somewhat under-estimated in the comments that have been made.

6.5.10 With regard to Hatton Gardens, I appreciate that land comprising the Council's original allocation is subject to flooding. However, it does not appear to me that this relates to the whole of the site. Indeed, the Environment Agency's letter of 14 May 2003 (Appendix C of the Council's statement) suggests that development of at least part of the site may be possible. I would expect this comment to apply to the land fronting Waterloo Road east of the Arrowfield Veterinary Surgery; also the area south and southeast of the vets.

6.5.11 I observed other potential opportunities in the vicinity of the estate. For example, there is derelict land and premises on the south side of Waterloo Road at its eastern end as well as overgrown land southeast of the approach to the sewage works. "The Foundry" site and land adjoining to the east represents a further potential opportunity. I appreciate that the Council may have to use its planning powers to realise some of this potential. Nevertheless, to my mind, there are a number of outstanding opportunities at Hatton Gardens.

6.5.12 The above comments set the context for consideration of land north of the B4355. Some objections would be overcome if the reduced area of land identified in Proposed Change No 8 was to be adopted. Be that as it may, there are a considerable number of outstanding matters including access issues; constraints imposed by the need to protect a waterway; restrictions on expansion; flooding; an owner unwilling to sell; maintaining riparian rights; biodiversity; productive existing use; and visual impact.

6.5.13 For my part, I see many of these points as capable of resolution through the detailed design of any scheme. However, notwithstanding the absence of any objection from English Nature, there remains the fact that development would be taking place on relatively rare, rich, unimproved grassland that comprises a greenfield site outside the present built-up limits of Kington. Given opportunities elsewhere, I do not consider that the site should be released.

6.5.14 In terms of other possible alternative sites, I report on land east of the A4111 in Section 6.19 of my report. With regard to land south of the River Arrow, this is liable to flooding as well as being an open countryside site beyond the built-up limits of Kington. The "Arrow Site" at Banley Farm is another open countryside site where built development would be harmful to the character and appearance of the area.

6.5.15 In conclusion, I note that Hergest Camp is an important resource relatively close to Kington. In this regard, future plans would benefit from a clear statement of the perceived future role of the camp and the development or redevelopment that the Council would be prepared to contemplate. More particularly, and within Kington, I do not consider that opportunities at Hatton Gardens have been fully explored. To my mind, this is a location that is clearly to be preferred over land north of the B4355 and west of Barton Lane. I recommend that the Council re-examines the potential afforded at Hatton Gardens.

RECOMMENDATIONS

6.5/1 Delete Paragraph 6.4.20 and the allocation of land north of the B4355 (including the 0.85 ha of land west of Barton Lane advanced under Proposed Change No 8) for employment purposes.

6.5/2 Subject to the priorities of the Council in preparing development plan documents as part of its local development framework, re-examine employment allocations in Kington in a development plan document that examines the potential of land at Hatton Gardens.

6.5/3 Do not make any other modification in response to the objections.

6.6 EMPLOYMENT LAND ALLOCATIONS - POLICY E3 AND PARAGRAPH 6.4.17 – LEDBURY - LAND NORTH OF VIADUCT

Objection

P618/1374 Mr B Clutterbuck

Summary of Objection / Issue

- Both the existing and the proposed employment land should be accessed from the bypass extension. (618)

Inspector's Reasoning and Conclusions

Access from the bypass - 618

6.6.1 At the inquiry, it was accepted that the matter the subject of the objection could be addressed in a development brief. I agree that this would be the appropriate way forward. No modification of the Plan is necessary.

RECOMMENDATION

6.6/1 Do not make any modification in response to the objection.

6.7 EMPLOYMENT LAND ALLOCATIONS - POLICY E3 AND PARAGRAPH 6.4.23 – WIGMORE - LAND SOUTHWEST OF KINGS MEADOW

Objections

P287/577 Hornchurch Construction Co Ltd
P287/10435 Hornchurch Construction Co Ltd

Summary of Objections / Issue

- The land should be removed from the employment provisions and allocated for housing. (287)

Inspector's Reasoning and Conclusions

Removal of employment land / allocation as housing land - 287

6.7.1 These objections have been met in part in that the proposed employment land allocation has been deleted from the Revised Deposit Draft. As to the future use of the site, I note that the area is only 0.3 ha. In my opinion, and in common with the practice in the Plan, a site of this small size would not normally warrant allocation. However, the site is within the settlement boundary of Wigmore. As such, I would expect that, in principle, use for either employment or housing purposes would be a possibility. No modification of the Plan is necessary.

RECOMMENDATION

6.7/1 Do not make any modification in response to the objections.

6.8 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4

Objections

P690/1699	Mr P Dazeley and Ross Chamber of Commerce
P790/6832	West Midlands RSL Planning Consortium
P890/2529	Government Office for the West Midlands
RP1483/10856	RLUK

Summary of Objections / Issues

- A much greater area of land at Ross-on-Wye should be allocated for business development. (690)
- The allocation of sites purely for employment purposes would not encourage mixed use developments. (790)
- Sites should be the subject of re-assessment rather than confirmation. (890)
- Employment generating uses in Ross-on-Wye which cannot be accommodated in the town centre should be concentrated in one location. (1483)

Inspector's Reasoning and Conclusions

Allocation for business development at Ross-on-Wye - 690

6.8.1 The amount of land needed for business development in Ross-on-Wye is considered in the report on the justification for the business park (Document N 7). There is inadequate justification under this objection for "a much greater area of land". No modification of the Plan is necessary.

Mixed use developments - 790

6.8.2 I note that Policy E4, now dropped from the Revised Deposit Draft, referred to new employment land allocations. However, Government advice on reallocating employment land for housing and mixed use developments (PPG 3, Paragraph 42) essentially relates to existing allocations. In any event, the Council has reviewed its non-housing allocations (Document N 2). None of the sites the subject of the former Policy E4 are identified as suitable for mixed use developments.

Re-assessing sites - 890

6.8.3 In the Revised Deposit Draft, the former Policy E4 with its reference to sites confirmed as being suitable for employment purposes has been dropped. The replacement policy refers to "other" employment land allocations. The objection has been met and no modification of the Plan is necessary.

Concentrating Ross-on-Wye employment sites in one location - 1483

6.8.4 The objection of RLUK is made in the context of the allocation at Model Farm, Ross-on-Wye as discussed below. Whilst I recognise the potential advantages of concentrating employment generating uses in one location, and hence maximising the opportunity to provide viable public transport, there is no evidence to suggest that this factor is of overriding importance in the selection of employment sites at Ross-on-Wye. No modification of the Plan is necessary.

RECOMMENDATION

6.8/1 Do not make any modification in response to the objections.

6.9 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 AND PARAGRAPH 6.4.27 – HEREFORD – LAND NORTH OF ROMAN ROAD

Objections

P49/463	Ms J Jeffery (Conditionally Withdrawn)
W186/461	Mr B Jeffery (Conditionally Withdrawn)
W198/1179	Hereford Civic Society (Conditionally Withdrawn)
W198/11306	Hereford Civic Society
P237/1012	Mr D West (Conditionally Withdrawn)
P415/11283	Crest Strategic Projects Ltd
P578/1262	J and E H Osborne
P613/1364	Mrs M Williams
P866/2460	Church Commissioners for England
P915/2622	Holmer and District Residents' Association
P1108/3553	Hereford and Gloucestershire Canal Trust Ltd
W10/24	Mr J and Ms M Byard
P48/240	Ms D and Mr R Holland
P64/536	Mr G V Hyde
P189/412	Mr W Walker
P190/414	Mr P Stevens
P192/416	Miss D L Whittingham
P193/417	Mr and Mrs Moody

W202/2613	Mr S and Mrs J Fields
P234/497	Mr W J Hanks
P259/543	V J Heath
P260/545	Mr G Preece
P262/547	Ms K O'Hare
W310/2700	Mr and Mrs G Vincent
P386/838	W H D Hartland
P386/10273	W H D Hartland
P442/913	Mr and Mrs P Roach
P488/1009	Mr and Mrs L Corbett
P493/1024	Mrs P Walker
W496/2021	Mr and Mrs S Watkins
P514/1055	Mr S Baker
P516/1068	Mrs J P Williams
P517/1056	Mrs Y Baker
P528/1092	A N West (Conditionally Withdrawn)
P529/1085	Mr J G and Mrs C L Codrington
P530/1098	J Cartwright
P531/1105	Mr A Wayman
P534/1115	Mrs M J Watkins
P536/1128	Mr and Mrs J Watkins
P537/1140	Mrs H E Cantrill
P538/1148	Mr K Tong
P540/1167	G B Stubbs
P541/1161	Mrs C A Lawson
P542/1195	Ms T Lane
P544/1214	Mrs J King and Mr D King (Conditionally Withdrawn)
P546/1218	Ms S Jones
P547/1220	E and J Brooks
P548/1225	G and M Rowe
P549/1222	Mr D and Ms Z Borthwick
P552/1229	Miss F M Riddell
P553/1231	Ms J Ramage-Smith
P557/1248	Mr G and Ms L Powell
P558/2123	Mr and Mrs R Corrigan
P559/1250	Mr and Mrs A J Dallimore
P560/1253	Mr A S Hayes
P561/1255	Ms E Horne
P577/1260	Mr A Kershaw (Conditionally Withdrawn)
P579/1264	Mr and Mrs A Onions
P581/1368	D R Volpe (Conditionally Withdrawn)
P583/1269	Ms G Morris
P584/1271	R J and K E Moxley
P598/5853	Mr C E Kennett
P606/1349	Mr R E and Mrs R Preece
P607/1351	Mr M L and Mrs C E Rawson
P608/1353	Mrs M Parsons
P611/1357	A P Thomas
P615/1367	Mr and Mrs I Wood
P619/1378	S R Cooke
P620/1384	Mr C J and Mrs D M Jones
P622/1387	Mr W G and Mrs P J Jay
P627/1400	Mr and Mrs L Harrison
P628/1403	Mr and Mrs M Graver
P630/1406	Mr and Mrs T R Galloway (Conditionally Withdrawn)
P631/1409	Mrs R Downes-Hopkins
P635/1538	Campaign to Protect Rural England (Conditionally Withdrawn)

P639/1417	K Donaldson
P640/1420	Mrs J E Davies
P642/1422	Mr and Mrs P Davies
P646/1446	Mr W E Turner
P740/1791	Mr I Harrison
P751/1841	G R and V D Minett
P762/1890	Ms H J Stockton
P795/2024	Mr K Watkins
P797/2026	Mr C and Mrs E Black
P798/2029	S P Greenly
P801/2033	Mr and Mrs A Horne
P803/2041	Mr A T and Mrs J J Howells
P804/2043	Mr I Watkins
P806/2058	Miss K P Uridge
P812/2104	Mrs V A Ball
P814/2107	Mr R A and Mrs T G Beveridge
P815/2113	Ms J and Mr M Williams
P816/2116	Mr J and Mrs N J Beveridge
P818/2120	Mr M and Ms L Beveridge
P820/2122	K and S Connor
P825/2132	Mr N and Mrs M Jones
P828/2138	Mr and Mrs A Creighton
P845/2223	Mrs C Watkins
P847/2239	D Butler
P849/2249	Mr W and Mrs A L Fotheringham
P850/2251	Mr A C and Mrs L M Cracknell
P851/2256	Mrs A Aitken
P852/2266	Ms A Little
P854/2271	Mr P Richards
P856/2278	Mr J F and Mrs S Tyler
P857/2279	Ms O Tomkins
P858/2287	Mr J Stiff
P860/2289	Mr M Richards
P861/2308	V A Pugh
P863/2321	Mr T V Morris
P868/2469	Mr P Saville
P869/2476	Mr R Binnersley
P870/2478	R E Barnes
P872/2480	Mrs A Field
P873/2482	Mr and Mrs K Mason
P875/2486	Mrs G Watkins
P877/2490	T H and G Edwards
P882/2495	Mr E L and Mrs B Crooks
P885/2499	Mr D and Mrs E M Brimfield
P887/2508	Mr P Cocks
P888/2510	D Barnes
P892/2512	Mr T and Ms L Lott
P893/2516	N M Agger
P899/2548	Mr N O'Neil
P900/2591	Mr M Hollis
P901/2592	Miss D Hooper
P902/2590	Mrs W Fisk
P905/2601	Ms J Pudge
P907/2603	Mrs J Allen
P908/2605	Mr S Adams
P909/2607	Mr G Doyle
P910/2609	Mrs D Perrin

P911/2611	Mr and Mrs I Combe
P912/2615	Ms I and Mr C Finch
P913/2617	L M Oakley-Davies
P914/2621	S R Smith
P931/2693	Mr A Beardwell
P932/2694	Mr J and Ms S Jenkins
P935/2702	Mr R T Bradley
P937/2704	A J and A R Fryer
P938/2706	Mr J E Arnold
P948/2751	Mrs S A Asquith (Conditionally Withdrawn)
P950/2752	Mr C Asquith (Conditionally Withdrawn)
P1014/3110	M H Clark
P1049/3178	M J Grundy
P1084/3439	W S Pollitt
P1127/3627	G Herbert
P1143/3652	Mr S Ramsdale
P1144/3654	Mr W G H Devereux
P1048/3176	Mr A E Hemming (Conditionally Withdrawn)
P1051/3180	Miss M Hill
P1152/3664	Mrs B Williams
P1153/3666	Mrs D Whittaker
P1155/3669	Mrs E Walshe
P1165/3692	Mrs M T Loughrey (Conditionally Withdrawn)

Summary of Objections / Issue

- Whether land north of Roman Road should be allocated for employment purposes. (All objectors)

Inspector's Reasoning and Conclusions

Allocation of land north of Roman Road – all objectors

6.9.1 The proposed allocation of land north of Roman Road for employment purposes has been dropped from the revised deposit version of the Plan. As such, I consider that all the associated objections to the Deposit Draft Plan have been met. There are, however, three outstanding objections to the Revised Deposit Draft. Hereford Civic Society, Crest Strategic Projects Ltd and W H D Hartland all consider that the allocation should be reinstated.

6.9.2 These three objectors point to the suitability of the site for employment development and to advantages that would flow from its allocation. However, I consider the determining issue to be whether there is a need to widen employment opportunities in Hereford particularly by allocating more employment land on the north side of the city.

6.9.3 In this regard, I have reached the conclusion in Section 3 of my report that excessive provision has been made for employment development across the county; also that there would appear to be no quantitative need for more employment land in Hereford. There are, however, a number of qualitative issues. These include questions over the distribution of employment land within the city and the fact that less than 7% of the employment land in Hereford is classed as readily available.

6.9.4 I do not have comprehensive information on the quality and distribution of the existing land that makes up the majority of the employment land supply. I have concluded that, in terms of new allocations, there would appear to be no pressing need to increase provision in Hereford. Nevertheless, bearing in mind the importance of Hereford as one of the sub-regional foci, I consider that detailed consideration should be given to the employment needs of the city. This is the subject of my recommendation 3.19/4. However, without adequate justification, a large additional allocation at this point in time would be premature.

RECOMMENDATION

6.9/1 Do not make any modification in response to the objections.

6.10 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 AND PARAGRAPHS 6.4.28 TO 6.4.29 – ROSS-ON-WYE - OVERROSS AND MODEL FARM SITE

Objections

W185/10453	Ross-on-Wye Chamber of Commerce
P195/425	Yorkley Timber Co Ltd
P358/11355	Environment Agency (Conditionally Withdrawn)
P361/763	Mr J Gammond (Conditionally Withdrawn)
P365/11166	Ross Rural Parish Council
P365/11490	Ross Rural Parish Council
P371/789	Ross-on-Wye and District Civic Society
W463/7327	Ross-on-Wye Town Council
P526/1137	Welsh Water (Conditionally Withdrawn)
P635/1539	Campaign to Protect Rural England
P635/11438	Campaign to Protect Rural England
P830/500229	Herefordshire Friends of the Earth
P862/2313	BP Oil (UK) Ltd
P862/10880	BP Oil (UK) Ltd
P866/2461	Church Commissioners for England
P975/11178	Persimmon Homes (South Midlands) Ltd
RP1483/10855	RLUK
P31/10115	Mr J B and Mrs J M Edwards
P196/427	Mr H Hague
P243/511	Mr B James
W358/1583	Mr L Cosker
W358/10445	Mr L Cosker
W358/10446	Mr L Cosker
P388/7503	Mr D Boynton and Son
P388/10226	Mr D Boynton and Son
P426/889	B R Edwards
P426/10851	B R Edwards
P643/1425	Mrs M Richards
P681/1673	Mr C W Richards
P1022/3078	Mr R J Bennett
P1022/11089	Mr R J Bennett
RP1251/10013	J Grinstead

RP1282/10097	Mrs J Bureau
RP1283/10100	P A Bureau
RP1284/10102	Mrs A M McMahon
RP1285/10107	Mr M Newman Cosker
RP1285/10108	Mr M Newman Cosker
RP1286/10110	G R Downing
RP1287/10112	Mr and Mrs C H Hirst
RP1288/10114	M and P Lodge
RP1289/10117	J E S Danks
RP1290/10119	Mr and Mrs C Watkins
RP1291/10122	R Cohen and E Phillips
RP1292/10124	M Knowles
RP1293/10126	Mr and Mrs Kernot
RP1294/10128	P Humpston
RP1295/10130	T and J Flowers
RP1296/10132	Mrs S M Besant
RP1297/10134	Mr M C Besant
RP1298/10136	Mr and Mrs S Williams
RP1299/10138	Mr D E Kirk
RP1300/10140	M D Blackney
RP1301/10142	Mr C Paganuzzi
RP1302/10144	Mr and Mrs R K Dixon
RP1303/10146	Mr G C Paganuzzi
RP1304/10148	Mr and Mrs Lines
RP1305/10150	N S Wallis
RP1306/10152	Mrs L Ashrat
RP1307/10154	Rev and Mrs D C Porter
RP1308/10156	Mrs J V Field
RP1309/10158	Mr S Rosser
RP1310/10160	A Sonn
RP1311/10162	S L Preedy
RP1312/10164	J and J S Bacon
RP1313/10166	C J Collins
RP1314/10168	Mr D Foy
RP1315/10170	Mr C I Wheeler
RP1316/10172	Mr P and Ms E Metcalfe
RP1317/10174	Mr B C and Ms E L Armstong
RP1318/10176	Dr and Mrs R Nasaratnam
RP1319/10178	Mr R I Hendrie
RP1320/10180	Mr W Bufton
RP1321/10182	Mrs J Baldwin
RP1322/10184	Mr M Price
RP1324/10188	G M Fulford
RP1325/10190	Dr M Taylor
RP1326/10192	Mr M and Mrs B Rich
RP1327/10194	P Goodby
RP1328/10196	A B McAllan
RP1330/10200	Mrs L J Weinhardt
RP1331/10202	Mr P Nicholls
RP1332/10204	Mr S B Jones
RP1333/10213	Mr V and Ms L Lewis
RP1334/10216	Mr N Pascoe
RP1335/10218	Ms E M Walker
RP1336/10222	Mr and Mrs T J R Booth
RP1337/10224	Mr R and Ms J Dowding
RP1340/10260	Mr A Hodges
RP1356/10285	Mr M Eardley

RP1357/10287	Mr R Fishwick
RP1358/10289	V L Lewis
RP1370/10352	Mr D and Ms L Dawson
RP1371/10354	Mr and Mrs Woodhouse
RP1372/10356	Mr and Mrs Michael Palfrey
RP1374/10374	Mr J and Ms M Morris
RP1375/10376	D J Bennett
RP1376/10378	Mrs C Hetherington
RP1422/10455	R A Francis
RP1441/10589	Mrs J Pascoe
RP1442/10591	Mr N Pascoe
RP1443/10593	Mr and Mrs J S Harley
RP1444/10595	R W Andrews
RP1475/10718	Ms C Soble
RP1499/11109	Mr S S Rogers

Objection to Proposed Change

P388/20115 Mr D Boynton and Son

Summary of Objections / Issues

- Whether additional employment land should be allocated at Ross-on-Wye. (185, 365, 196, 388, 426, 643, 681, 1304, 1022)
- Whether the Model Farm site should be allocated for employment purposes. (185, 385, 365, 388, 830, 1483, 31, 358, 426, 1022, 1251, 1282-1322, 1324-1328, 1330-1337, 1340, 1356-1358, 1370-1372, 1374-1376, 1422, 1441-1444, 1483, 1499)
- Whether the Overross site should be allocated for employment purposes. (185, 195, 196, 361, 365, 371, 388, 635, 862, 866, 1483, 243, 358, 426, 463, 526, 643, 681, 1022, 1251, 1282-1322, 1324-1328, 1330-1337, 1340, 1356-1358, 1370-1372, 1374-1376, 1422, 1441-1445)
- Whether land at Hildersley Farm should be allocated for employment purposes. (388)
- Whether there should be amended reference to contributions and pedestrian / cycle connections. (975)

Inspector's Reasoning and Conclusions

Additional employment land allocations - 185, 365, 196, 388, 426, 643, 681, 1304, 1022

6.10.1 The first main issue in this section is whether additional employment land should be allocated at Ross-on-Wye. Some objectors, such as the Chamber of Commerce, would wish to see both the Model Farm and the Overross sites allocated for employment purposes. Others are more cautious. They suggest that need and unused capacity should be investigated in more detail, particularly brownfield sites and premises that may become vacant. That the proposed provision is not justified by the unemployment figures or that a smaller allocation would suffice are at the root of other objections.

6.10.2 As my starting point, I have examined the report of the justification for a business park at Ross-on-Wye (Document N 7). It does not appear to me that the methodology based on the ratio of employment land to housing land has been seriously questioned by the objectors. Although there is a mistake in the way the employment land requirement is expressed in relation to every 100 households, this does not undermine the concept of the ratio or the conclusion that some 10 to 13 ha of land will be required. In addition, I do not consider that doubts about enquiries regarding land and premises invalidate the conclusions.

6.10.3 I appreciate that things have changed since the report was produced (March 2001). For example, the downturn in UK manufacturing continues. In addition, it could be argued that the absence of high unemployment in Ross-on-Wye militates against substantial provision. On the other hand, additional housing and some loss of employment land is to be expected as a result of implementation of the UDP.

6.10.4 In conclusion, I have no reason to doubt that some 10 to 13 ha of land will be required to service the employment land needs of Ross-on-Wye for the period covered by the UDP. In addition, and as concluded in the business park justification study, the provision should be capable of accommodating a range of requirements within Classes B1, B2 and B8. In this regard, any contribution from brownfield sites or vacant premises would be very modest and would not obviate the need for the release of additional land.

6.10.5 I would agree that the 10 to 13 ha of land does not necessarily have to be in a single site. Nevertheless, given the advantages of impact and critical mass, a single site is to be preferred particularly for a high profile strategic business park scheme. However, only one new site of the appropriate size would be justified. Its release now would not be premature.

Model Farm - 185, 385, 365, 388, 830, 1483, 31, 358, 426, 1022, 1251, 1282-1322, 1324-1328, 1330-1337, 1340, 1356-1358, 1370-1372, 1374-1376, 1422, 1441-1444, 1483, 1499

6.10.6 I now turn to the question of whether, in meeting the employment land needs of Ross-on-Wye, the Model Farm site would be suitable. This site became the preferred site of the Council at the revised deposit stage and replaced the Overross site as included in the Deposit Draft Plan.

6.10.7 The reasons for this change are not obvious to me. The Council's statement says that "Concerns in respect of achieving a suitable access to the Overross site resulted in the deletion of the proposal and its replacement with the allocation of Land at Model Farm." In this regard, I am referred to the minutes of the Council's working group.

6.10.8 Access to the Overross site was discussed at the working group meeting on 8 December 2003 (Document J 19) but "The Group agreed that the present (Overross) site should be retained in the UDP, and that there should be no further land allocation for employment purposes." The above came on 19 December 2003:

"Officers indicated that only one site was required, and that options could not be included in the Plan. Officers set out the relative merits of the two sites, including the fact that the Model Farm site lay on a source protection zone for an aquifer which could limit the range of future uses. Reference was also made to the degree of local opposition that the Model Farm site had encountered when proposed during the preparation of the South Herefordshire District Local Plan.

Having considered the issues surrounding the proposal, members agreed the following:

The Deposit Plan proposal at Overcross be deleted and replaced by that at Model Farm."

6.10.9 My preliminary conclusion is that the suitability of the access to the Overcross site is at issue. This is a matter that I consider below. There are, however, a considerable number of objections that have been raised in respect of the Model Farm site.

6.10.10 The objections have been summarised and discussed under a number of headings in the Council's statement. In my opinion, many of these matters are not of overriding importance, do not affect the principle of whether the site should be allocated or are capable of technical resolution through conditions and obligations.

6.10.11 For example, subject to full assessment of the potential impacts of development on the source protection zone of the Alton Court aquifer, and the provision of all necessary mitigation, the Environment Agency has no objection in principle to the allocation. Similarly, there are no objections in principle from the competent authorities on access grounds or in relation to flooding. The principle of whether the site should be allocated given its countryside and landscape setting is, however, a matter that needs to be considered in detail.

6.10.12 I saw that the proposed site occupies a site in the open countryside detached from the built-up area of Ross-on-Wye. Although the observer is aware of the nearby urban area, the setting of the site is rural and agricultural. When leaving the outskirts of Ross-on-Wye and approaching the site from the west, there is an obvious sense of passing out of the town and into the open farmed countryside. This impression would not be lessened by the proposed landscape buffer on land between the limits of Ross-on-Wye and the allocation site.

6.10.13 To the southeast, opposite the objection site, there are open views across a rising agricultural foreground and towards the fine wooded slopes of the higher ground beyond. There are limited views of buildings at Hildersley Farm. However, the overall impression of the farm complex is of a treed setting including a fairly well contained orchard. I would not expect this impression to change significantly following implementation of the planning permission for employment development at the farm.

6.10.14 There are open views towards and across the objection site from the east. The approach is through the open, rural, agricultural countryside along the single carriageway A40. The edge of the built-up area can be seen from the southeast corner of the site; also the fairly "scruffy" agricultural buildings on the site itself. However, the impression is again of a location detached from the built-up area in an open countryside setting beyond the limits of Ross-on-Wye.

6.10.15 In these terms, I consider that the site is totally unsuitable for the proposed use. It would be an incongruous development alien to the character and appearance of its setting and in a somewhat anomalous location detached from the built-up area of Ross-on-Wye. The need for a buffer zone, whilst important to the screening of the site and to the amenity of residents to the west, would serve to emphasise the detached setting and the undeveloped nature of the surroundings.

6.10.16 In this respect, I concur with the site specific comments of the Inspector reporting on the South Herefordshire District Local Plan (Document H 8,

Paragraph 51.135): "This area is in agricultural use and belongs to the County Council. Ownership may therefore have been a factor in this decision rather than land use considerations. For my part however I would not support the release of this site ... In particular I consider that the development of this land would be poorly related to the rest of the town and an intrusion into the countryside, which would be inappropriate in landscape terms and unacceptable."

6.10.17 I have reached the firm conclusion that the Model Farm site should not be allocated for employment purposes. I recommend accordingly.

Land at Overross - 185, 195, 196, 361, 365, 371, 388, 635, 862, 866, 1483, 243, 358, 426, 463, 526, 643, 681, 1022, 1251, 1282-1322, 1324-1328, 1330-1337, 1340, 1356-1358, 1370-1372, 1374-1376, 1422, 1441-1445

6.10.18 Certain possible alternatives to the Model Farm site are considered in subsequent part of this section. However, I consider here land at Overross being land to the south of the A449 that formed the employment allocation at the deposit draft stage.

6.10.19 As noted above, the Council's concern appears to relate to access. In this regard, the Council's statement refers to work undertaken by consultants. "The Study concluded that a direct access onto the Overross roundabout or the A449 was not appropriate due to capacity and safety issues and instead an access off the M50 roundabout was seen as the most suitable solution for the site." However, this does not appear to be an overriding problem as the statement continues by saying, "As a result of this work the Overross site was included in the Deposit Draft Plan."

6.10.20 Another potential access difficulty is that reported by Herefordshire Council Transportation and summarised in the Council's statement as follows: "Difficulties in achieving sustainable transport. Site is severed from urban area by A40 and A449, making pedestrian and cycle access difficult to achieve. Unlikely to achieve a bus service into the site."

6.10.21 These comments date from 2001. I do not know whether they are up to date, for example, in respect of provision of bus services and related expectations. Be that as it may, I acknowledge that crossing the A40 in particular could be a problem for pedestrians and cyclists. However, I would expect improvements to be effected as part of any business park development. Bearing in mind also likely changes to the Overross roundabout in connection with this and other developments, I do not see an overriding problem in this regard. Similarly trips across the A449, although less important, could also be facilitated.

6.10.22 Other detailed access matters have been raised by objectors. For example, there is stated to be confusion over the access point. For my part, and from a reading of the Deposit Draft Plan, I am clear as to the Council's intentions. Improvements would be needed to the Overross roundabout to avoid overloading but access would be taken off the M50 roundabout in conjunction with a new farm access. It is not necessary to show an indicative access route. Indeed, I do not see that other options would be precluded if these could be negotiated with the Highways Agency.

6.10.23 Notwithstanding the above, some important matters of principle have been raised by objectors. Reference is made to the comments of the previous Local Plan Inspector and the damage that would be caused by developing this uncontained, greenfield, agricultural site in the open countryside beyond the built-

up area and the harm that would be caused on the setting of Ross-on-Wye, its landscape character, visual amenity, environment and tourist industry.

6.10.24 In this regard, I consider that the case has been made for the allocation of an employment site that would have to be on a greenfield site. The Overross site is outside the Area of Outstanding Natural Beauty. More particularly, it does not have an attractive, rural, countryside setting. It is adjacent to the built-up limits of the town to the west and the termination of the M50 to the east. The environment is one that is dominated by the duelled A449 trunk road with its high volumes of traffic and heavy goods vehicles; "The French Hen" and "Labels of Ross" factory outlet store on the north side of the A449 together with lorries parked in a lay-by; and the BP service area to the south.

6.10.25 I appreciate that landscaping of the site and the scale of the buildings will be important considerations; also the nature of the environment, access and safety, the relationship with Ross-on-Wye and matters such as noise, pollution, archaeology, run-off and delineation of boundaries. However, to my mind, these and other detailed matters can be addressed in the planning of the site and by the imposition of conditions and obligations.

6.10.26 With regard to potential uses, I do not consider that Class B8 uses should be excluded. I appreciate that the number of jobs created is usually less than in other Class B developments. Nevertheless, warehousing and storage sites are important to the economy and in a portfolio of available land. As to specific allowance for the expansion of existing uses, I regard this as unnecessary. The expansion of existing companies is safeguarded under Policies E6 and E7.

6.10.27 Comparisons are inevitable. I consider the Overross site to be far less sensitive than the Model Farm site. I support the commentators who have noted the superior transport links; the key, nodal, high profile, prestigious location; a willing owner; and the good relationship with other employment land notably at the Overross Industrial Estate. I do not consider that there are any overriding constraints that would affect the principle of allocation. I recommend that the provisions be reinstated in the place of the proposals for Model Farm.

Land at Hildersley Farm - 388

6.10.28 I do not consider that matters such as agricultural land quality or need to protect the Alton Court aquifer are of overriding importance in respect of the Hildersley Farm site. However, as with the Model Farm site, its development for employment purposes would be totally inappropriate.

6.10.29 There would be a tenuous connection with development on the south side of the A40. However, the site is essentially separated from the urban area by open land east of the Chaseview Veterinary Clinic and, to my mind, is an obvious part of the open countryside. It comprises farmland across which there are views, notably from the west, towards an attractive landscape of fine wooded slopes. Employment development on this open agricultural area would be significantly harmful to the rural character and appearance of the area and would represent an unwarranted encroachment into open countryside.

6.10.30 I appreciate that planning permission has been granted for the employment use of traditional farm buildings at Hildersley Farm; also for new light industrial units. However, I would expect these uses and buildings to be relatively contained and respect the rural nature of the surroundings. They would not in any

way provide the justification for employment development on the open agricultural land surrounding the farm complex.

Contributions and pedestrian / cycle connections - 975

6.10.31 Paragraph 6.4.29 in both the deposit draft and the revised deposit versions of the Plan contains provisions in respect of the Tanyard Lane site. In this regard there is potential confusion over which provisions cover which site. Given that there is a separate paragraph on the Tanyard Lane site, I see no reason for Paragraph 6.4.29 to deal with aspects of both sites. Any ambiguity would be avoided if comments in the respective paragraphs were confined to the related sites. I recommend accordingly.

6.10.32 In addition, and as agreed at the inquiry, to refer in Paragraph 5.4.22 to "occupation of the development" would be less onerous but would still meet the objective of the provision.

RECOMMENDATIONS

6.10/1 In relation to Policy E3 and Paragraph 6.4.29, delete the provisions relating to Model Farm and reinstate those in respect of the Overcross site.

6.10/2 In reinstated Paragraph 6.4.29, delete the words "(together with that of the proposed housing at Tanyard Lane)". In Paragraph 5.4.22, delete the words "and the new business park proposal". In the same sentence, substitute "occupation of the development" for "the commencement of either development".

6.10/3 Do not make any other modification in response to the objections.

6.11 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - DORMINGTON - CLASTON FARM

Objection

P1190/3772 Mr P Davies

Summary of Objection / Issue

- Land at Claston Farm should be allocated as a major farm diversification and tourism scheme. (1190)

Inspector's Reasoning and Conclusions

Land at Claston Farm- 1190

6.11.1 Since the objection was lodged, the Secretary of State has granted planning permission for two development proposals. The first is full planning permission for the regeneration of redundant farm buildings, conversion of farm buildings, construction of workshop and office / workshops, living working units, affordable housing units, provision of auditorium / training / showcase facilities. The second permission is outline planning permission for a public house. Given that the

objection proposal now has the benefit of planning permission, I see no need for the land to be allocated within the UDP.

RECOMMENDATION

6.11/1 Do not make any modification in response to the objection.

6.12 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - GRAFTON - GRAFTON INN

Objection

P946/2747 Mr M B Roberts

Summary of Objection / Issue

- Land at the Grafton Inn should be allocated for further employment uses. (946)

Inspector's Reasoning and Conclusions

Land at the Grafton Inn - 946

6.12.1I appreciate that a number of arguments can be advanced in support of an employment or mixed use allocation at the objection site. In this regard, many points have been put forward by the objector's agent. However, to my mind, the fundamental issue is whether this is an appropriate location for a new allocation. In my opinion, it is not.

6.12.2The Council's strategy is to focus development in a limited number of centres where employment, housing, services and other facilities can be provided close together. Away from the urban areas of Hereford and the market towns, development is directed to main villages with any additional development essentially being limited to smaller settlements or established employment areas. To my mind, this approach reflects the guidance in PPS 7 at Paragraph 3 and is to be supported.

6.12.3The objection site is located in the open countryside. Although there are existing employment uses and a limited amount of other development in the locality, and the site is served by public transport, the area does not have the range or scale of facilities and amenities that are to be found in main villages or smaller settlements. In addition, the scale of local employment is very small compared with the established employment areas.

6.12.4In conclusion, this is not a location where new allocated employment or employment generating uses outside the terms of Policy E11 should be encouraged. No modification of the Plan is appropriate.

RECOMMENDATION

6.12/1 Do not make any modification in response to the objection.

6.13 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - GRAFTON - GRAFTONBURY GARDEN HOTEL

Objection

P930/2697

Mr C N A Stanford

Summary of Objection / Issue

- The Graftonbury Garden Hotel site should be considered for employment use. (930)

Inspector's Reasoning and Conclusions

Employment use at Graftonbury Gardens Hotel site - 930

6.13.1 In Section 6.12 above, I have examined the case for employment development at the Grafton Inn. The same sort of considerations apply to the site of the Graftonbury Garden Hotel at Grafton. The Graftonbury Garden Hotel is not in a location that meets the legitimate criteria for demarcation within the UDP as a specific site for employment redevelopment.

6.13.2 I appreciate that, at Grafton, there is a limited amount of housing and employment. However, the area does not have the range or scale of facilities and amenities that are to be found in main villages or smaller settlements. In addition, the scale of local employment is very small compared with the established employment areas.

6.13.3 Unlike the objector's agent, I do not consider that Grafton is a sustainable location for development, effectively part of Hereford. I perceived the hotel to be in the open countryside beyond the built-up limits of Hereford and approached along a narrow rural lane. Irrespective of development that may have been allowed in the past, this is not a location where new allocated employment or employment generating uses outside the terms of Policy E11 should be encouraged in a new development plan.

RECOMMENDATION

6.13/1 Do not make any modification in response to the objection.

6.14 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - GRAFTON - LAND OFF GRAFTON LANE

Objection

P961/2775

The Morgan family

Summary of Objection / Issue

- Land at Grafton Lane ought to be included for further forms of employment generating enterprises. (961)

Inspector's Reasoning and Conclusions

Employment generating enterprises on land at Grafton Lane - 961

6.14.1 In Sections 6.12 and 6.13 above, I have examined the case for employment development or redevelopment at the Grafton Inn and at the Graftonbury Garden Hotel. The same sort of considerations apply to the objection land at Grafton Lane. This is not a location where new allocated employment or employment generating uses outside the terms of Policy E11 should be encouraged. No modification of the Plan is appropriate.

RECOMMENDATION

6.14/1 Do not make any modification in response to the objection.

6.15 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - HEREFORD - WEST OF BEECH BUSINESS PARK

Objection

P200/436 Ravenhill Farm Services

Summary of Objection / Issue

- Land west of Beech Business Park should be designated for employment purposes. (200)

Inspector's Reasoning and Conclusions

Land west of Beech Business Park - 200

6.15.1 It appears to me that Ravenhill Farm Services is an important local company. It is a major supplier of agricultural equipment in Herefordshire and The Marches. The company moved into purpose built premises at the Beech Business Park in 1992. This is now the head office where some 21 staff are employed. However, the business operates in cramped conditions and expansion is an important requirement.

6.15.2 The Council has suggested relocation to a larger site. However, there are a number of problems. For example, there is a lack of suitable sites. Only two sites have been revealed by the Council's property register, both at Rotherwas. More particularly, bearing in mind existing and future business requirements, the firm needs to be located in north or northwest Hereford. If local premises cannot be found, there is a danger that the company would move to Shrewsbury.

6.15.3 The possibility of expansion to the west of Beech Business Park has been considered before. In this regard, an appeal was dismissed in May 2000. Part of the problem is that expansion of the business park would involve encroachment into the countryside outside Hereford's settlement boundary. In addition, south of the objection site, the business park does not have strong defensible boundaries and there could be pressure for more expansion into the open countryside. Further, and in relation to the UDP, the Plan does not make allocations for the needs of individual companies.

6.15.4 I saw that Roman Road in the vicinity of the objection site has recently been improved. I was told that this had resulted in an urbanising effect. Certainly, when approaching from the west, I had the clear impression of driving into an urban area. Indeed, the western elevation of the premises occupied by Ravenhill Farm Services is clearly visible and can be seen in marked contrast to the open countryside generally to the west of Hereford. Planting on the western periphery of the city at this point would be highly desirable.

6.15.5 In all the circumstances, I believe that expansion of Ravenhill Farm Services by utilising the land west of Beech Business Park should be supported. Development should be accompanied by planting along the western boundary of the site. I do not consider that the character or appearance of the area would be materially harmed.

6.15.6 However, the allocation of land for the expansion of a particular company would not be appropriate. In addition, I would not wish to encourage the unwarranted expansion of the remainder of the business park into the open countryside. As such, I feel that the most appropriate solution would be to extend the settlement boundary of Hereford to include the objection site.

6.15.7 Inclusion within the settlement boundary of Hereford would pave the way for expansion under Policies E6 and E7 and would allow for negotiated landscaping on the western boundary of the site. I appreciate that Policy E7 refers to making use of previously developed land in preference to greenfield land. However, this is only "wherever possible". The use of brownfield land would not be possible in this instance.

RECOMMENDATIONS

6.15/1 Extend the settlement boundary of Hereford so as to incorporate land west of Beech Business Park.

6.15/2 Do not make any other modification in response to the objection.

6.16 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - HOLMER - NORTH OF THE ROSE GARDENS PUBLIC HOUSE

Objection

P991/2960

E Coombs and M Freeman

Summary of Objection / Issue

- Land north of the Rose Gardens public house should be included for further forms of employment generating enterprises.

Inspector's Reasoning and Conclusions

Land north of the Rose Gardens public house - 991

6.16.1 In Sections 6.12 to 6.14 above, I have supported the Council's policy in respect of the location of employment generating enterprises. The objection site, north of the Rose Gardens public house, is in open countryside to the north of Hereford. It is not within a settlement that would qualify as a location suitable for the allocation of up to 4.3 ha of land for B1, B2, B8 or other office or commercial uses. No modification of the Plan is appropriate.

RECOMMENDATION

6.16/1 Do not make any modification in response to the objection.

6.17 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - KINGS ACRE, HEREFORD - LAND AT WYEVALE

Objection

P1067/3237 Wyevale Holdings Ltd

Summary of Objection / Issue

- Wyevale land should be identified as employment land. (1067)

Inspector's Reasoning and Conclusions

Identifying Wyevale land as employment land - 1067

6.17.1 The objector is in something of a quandary. Large areas of the site are given over to plant containers and the like that stand on gravel beds. The plant material is grown in fertilised compost and irrigated by water. However, the surplus water filters through the gravel beds. There is a loss of water and potential pollution of the underlying aquifer.

6.17.2 At the same time, abstraction of water is becoming increasingly difficult and the procurement of supplies expensive. Demand is often in excess of the permitted abstraction limits. In addition, the pollution regime is such that greater protection of the aquifer in the vicinity of the site is becoming increasingly important.

6.17.3 The company's solution is to make greater use of underlined beds. These would enable surplus water to be captured, purified and re-circulated. Pollution of ground water would be avoided and the difficulties and costs of procuring water would be minimised. The most sensible solution for the company would be to

purchase or rent adjacent land, prepare underlined beds on such land and bring the new beds into use without loss of capacity on the main site. However, all of this would be a costly operation for which considerable funding would have to be found.

6.17.4 Bearing in mind the “developed” nature of the nursery areas with their gravel beds, roadways and covered areas, the company envisages that such land could be used for employment purposes with the proceeds helping pay for all the necessary improvement works.

6.17.5 For my part, I have considerable sympathy for the objector. Wyevale is a major employer providing some 500 local jobs. It does not get agricultural grants; it has a “developed” site even though it does not come within the definition of “previously developed”; and it needs to respond to tightening European Union regulations all in circumstances where the improvement works would cost many millions of pounds. Nevertheless, the desirability of the works and the need to fund the proposals do not mean that an unacceptable land use should be sanctioned.

6.17.6 In my opinion, the overriding issues are the quantitative and locational arguments. The amount of land allocated in the UDP already exceeds that which is likely to be needed in the foreseeable future. There is no justification for further provision. In terms of the location, I support the Council’s strategy of making allocations within the main urban areas rather than in out of city locations such as this. I would also be seriously worried about the effect of employment development on the character and appearance of what is essentially a rural setting.

6.17.7 I acknowledge that there are sometimes exceptions to the rule. For example, it is considered that the livestock market could be moved to a location outside the limits of the city. However, the benefits that would stem from the objector’s proposals would not outweigh the considerable disbenefit of over-providing for employment development and in a rural location outside the city even on the reduced scale now envisaged. No modification of the Plan is appropriate.

RECOMMENDATION

6.17/1 Do not make any modification in response to the objection.

6.18 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - KINGSTONE - REAR OF SURGERY

Objection

P987/2947 Scott Newman Group

Summary of Objection / Issue

- Land at the rear of the surgery in Kingstone should be included for other forms of employment generating enterprises. (987)

Inspector's Reasoning and Conclusions

Employment generating enterprises on land at the rear of the surgery - 987

6.18.1 Kingstone is classified as a main village. As such, it is a location where development could be sustainable. In this case, however, 2.1 ha of land at Gooses Foot Industrial Estate, Kingstone, have already been allocated for B1 employment uses.

6.18.2 At the inquiry, the objector's agent envisaged that part or all of the objection site could serve as a substitute for the Gooses Foot site. In this regard, the objection site was seen to have certain advantages, for example, being closer to the village and being in the private sector.

6.18.3 There do not appear to be any duly made objections to the Gooses Foot allocation. As such, I would expect the provision to be carried forward into the adopted UDP. Any allocation to the rear of the surgery would be additional to this allocation. Further, such allocation would be on land which I perceived to be clearly outside the built-up limits of Kingstone albeit adjacent to the village. If allocated, development would be taking place in the open countryside.

6.18.4 In my opinion, the allocation at Gooses Foot will be sufficient to meet the needs of this part of Herefordshire. Notwithstanding the perceived advantages of the objection site, there is inadequate justification for the allocation of additional land or additional land outside the built-up limits of the village. No modification of the Plan is necessary.

RECOMMENDATION

6.18/1 Do not make any modification in response to the objection.

6.19 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - KINGTON - EAST OF A4111

Objection

P122/317

Mr B T Trumper

Summary of Objection / Issue

- Whether land east of the A4111 should be allocated as employment land. (122)

Inspector's Reasoning and Conclusions

Allocation of land east of the A4111 - 122

6.19.1 I have considered the employment needs of Kington in Section 6.5 above. I recommend that the potential of the Hatton Gardens area should be re-examined. With regard to the land east of the A4111, I concur with the views of the Council. It is a large, sensitive, undeveloped site that lies in the countryside and forms open agricultural land. It is poorly related to Kington in an unsustainable location. It is

of a scale that bears no relation to the needs of the area and, if developed, would have a significant impact on the landscape.

RECOMMENDATION

6.19/1 Do not make any modification in response to the objection.

6.20 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - LEDBURY - ADJACENT TO COUNTRYWIDE FARMERS

Objection

P744/1813 Countrywide Farmers

Summary of Objection / Issue

- Land adjacent to premises of Countrywide Farmers should be allocated for employment purposes. (744)

Inspector's Reasoning and Conclusions

Employment use of land adjacent to Countrywide Farmers - 744

6.20.1The objector has indicated that it would be desirable to reduce out-commuting from Ledbury; also provide employment land, particularly for offices, to meet the rapid expansion of the town. However, it appears to me that a sufficiency of land is available or could be made available within the Plan period. The details are set out in the Council's statement.

6.20.2In addition, I do not consider that the objection site is suitable for development. It is part of an open and exposed area of attractive countryside outside the built-up limits of Ledbury. To my mind, there is no justification for breaching the strong physical boundary of the town and encroaching into its rural surroundings. No modification of the Plan is appropriate.

RECOMMENDATION

6.20/1 Do not make any modification in response to the objection.

6.21 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - MADLEY AIRFIELD

Objections

P1029/3149 Mr A C D Matthews
P1057/3192 Madley Communications Centre

Summary of Objections / Issues

- Land at Great Brampton Farm should be included within the land designated under Policy E4 at Madley Airfield. (1029)
- The existing designated industrial area should be extended to include land to the north. (1057)

Inspector's Reasoning and Conclusions

Land at Great Brampton Farm - 1029

6.21.1 In terms of employment provision, the Council's main aim is to make allocations in Hereford and the market towns where jobs, houses, services and other facilities can be provided close together. The opportunities for the use of public transport, and for walking and cycling, can also be maximised. In addition, certain new provision to serve the rural areas is made, for example, near the main villages of Withington and Kingstone where similar benefits would obtain. That employment needs are met by existing sites and premises is also important. These are safeguarded under Policy E5.

6.21.2 The Stoney Street Industrial Estate utilises hangers associated with the disused airfield at Madley. It has become an established employment site and, as such, is safeguarded employment land. However, it is not in a location where new employment development would normally be encouraged. In any event, a sufficiency of employment land to serve the rural areas has been allocated under the UDP.

6.21.3 Given the above, there is no justification for allocating a considerable area of agricultural land to the west of the industrial estate. No modification of the Plan is necessary.

Land to the north of the industrial area - 1057

6.21.4 For the same reasons as given in relation to land at Great Brampton Farm, it would not be appropriate to extend the Stoney Street Industrial Estate to include land to the north. If there turns out to be other material considerations in relation to Madley Communication Centre, these can be considered on their merits and in the light of the availability of suitable land. It does not appear to me that there are firm proposals that need to be addressed in the development plan.

RECOMMENDATION

6.21/1 Do not make any modification in response to the objections.

6.22 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - ALTERNATIVE SITE – ROSS-ON-WYE - MOTORWAY SERVICE AREA (NORTH)

Objections

P862/2303

BP Oil (UK) Ltd

P862/2310

BP Oil (UK) Ltd

Summary of Objections / Issue

- The Ross-on-Wye Motorway Service Area (North) site should be reallocated for either a retail or employment / business use proposal. (862)

Inspector's Reasoning and Conclusions

Reallocation of Ross-on-Wye Motorway Service Area (North) site - 862

6.22.1 The redevelopment of the objection site for an employment / business proposal could be considered under Policy E7. Bearing in mind also that adequate land at Ross-on-Wye would be allocated for employment purposes on other sites, no modification of the Plan is necessary.

6.22.2 With regard to a retail proposal, no information has been presented on need or on the absence of sequentially preferable sites. There is inadequate justification for any modification of the Plan.

RECOMMENDATION

6.22/1 Do not make any modification in response to the objections.

6.23 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - ALTERNATIVE SITE – ROSS-ON-WYE - PART OF HILDERSLEY FARM, MODEL FARM AND PART FORMER MOD LAND

Objection

P388/830

Mr D Boynton and Son

Summary of Objection / Issue

- Alternative sites part located at Hildersley Farm, at Model Farm and on part of the former MOD land should be considered. (388)

Inspector's Reasoning and Conclusions

Alternative employment land at Ross-on-Wye - 388

6.23.1 In the main, the basis of this objection is that the impact and critical mass of a single site could also be achieved from two or three smaller sites. Smaller sites could create suitable "gateways", would have a lesser impact on amenity and would have a greater likelihood of being developed.

6.23.2 As noted in Section 6.10 above, I do not consider that provision necessarily has to be in a single site. Nevertheless, a single site is to be preferred. More particularly, the sites mentioned are totally unsuitable for employment use even as smaller gateway sites. To my mind, they would involve incongruous development

in a countryside setting detached from the built-up area of Ross-on-Wye and significantly harmful to the character and appearance of their surroundings. I do not support their identification as alternative sites.

RECOMMENDATION

6.23/1 Do not make any modification in response to the objection.

6.24 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - ALTERNATIVE SITE - ROSS-ON-WYE - LAND NORTH OF OVERROSS

Objection

P1022/3079 Mr R J Bennett

Summary of Objection / Issue

- Further extension to the existing industrial park at Overross should be considered. (1022)

Inspector's Reasoning and Conclusions

Further extension of the existing industrial park at Overross - 1022

6.24.1 The objector has attributed a number of advantages to the land north of the Overross Industrial Estate. However, to my mind, the overriding consideration is that employment development would constitute a significant breach of the existing built-up limits of Ross-on-Wye and unwarranted extension into the open Area of Outstanding Natural Beauty.

6.24.2 In this regard, the northern limits of Ross-on-Wye and the industrial estate at this point are marked by an extremely well vegetated boundary that follows a natural watercourse. There are only occasional glimpses, from the eastern part of the industrial area, to the south-facing slopes of the open agricultural land beyond. In my opinion, it would be totally inappropriate for this strong boundary to be breached and for built development to be allowed to encroach into the attractive rural countryside to the north.

6.24.3 The alternative Overross site is already strongly associated with employment development of one sort or another on both sides of the A449 as well as with the busy trunk road itself. Harmful views towards the site from the south could be avoided by careful attention to the scale and location of the buildings as well as the landscaping of the site. Bearing in mind the availability of this alternative, there is no justification for allocation of the objection site.

RECOMMENDATION

6.24/1 Do not make any modification in response to the objection.

6.25 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - ALTERNATIVE SITE - ROSS-ON-WYE - TANYARD LANE

Objection

W461/956 ABT Products Ltd

Summary of Objection / Issue

- Land at Tanyard Lane should be the preferred option for employment land in Ross-on-Wye. (461)

Inspector's Reasoning and Conclusions

Land at Tanyard Lane - 461

6.25.11 I agree that matters have moved on since preparation of the report justifying a business park at Ross-on-Wye (Document N 7). In particular, I do not consider that a risk of flooding would rule out allocation of the objection site for employment purposes. However, another of the changed circumstances is the need to find additional housing land. In this regard, and bearing in mind the close proximity of residential properties, I am of the opinion that the site lends itself more appropriately to housing development. Employment provision can be made on other suitable land and no modification of the Plan is necessary.

RECOMMENDATION

6.25/1 Do not make any modification in response to the objection.

6.26 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - ALTERNATIVE SITES - ROSS-ON-WYE - VARIOUS SITES

Objection

P426/7506 B R Edwards

Summary of Objection / Issue

- There should be employment development on brownfield sites and unused, under-used and undeveloped land within the urban area. (426)

Inspector's Reasoning and Conclusions

Employment development on land within the urban area - 426

6.26.1 Matters relating to the land at Overcross, which is considered to be unsuitable by the objector, have been addressed in other parts of this section. However, a number of "urban" sites have been suggested. These are land adjacent to ABT;

Ashburton Industrial Estate; the old coalyard; Broadmeadows; and land near to Alton Road.

6.26.2 In this regard, the zoning of the old coalyard site for employment purposes continues in the UDP. Land adjacent to ABT and other land at Broadmeadows is subject to flooding. Allocation would be premature. However, there are policies in the Plan under which undeveloped sites could be considered as and when flooding constraints have been overcome. In addition, the Broadmeadow site is occupied by a caravan park that is an important tourist facility. Land near to Alton Road is subject to a number of shortcomings as reported by the Council. All in all, I do not consider that the employment needs of Ross-on-Wye would be met under the objector's strategy.

RECOMMENDATION

6.26/1 Do not make any modification in response to the objection.

6.27 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - WEOBLEY - LAND NORTH OF BURTON WOOD ROAD

Objection

P472/977

Mr J Lloyd

Summary of Objection / Issue

- Whether land north of Burton Wood Road should be allocated for employment / mixed development. (472)

Inspector's Reasoning and Conclusions

Land north of Burton Wood Road - 472

6.27.1 The objector's agent indicates that greater self containment could be achieved by a modest allocation to foster additional employment uses. For my part, I have no firm evidence as to the extent of present and likely future out-commuting and whether or not such levels would cause significant problems.

6.27.2 Nevertheless, I am aware of a number of employment opportunities within and close to Weobley. In addition, the Council has considered the needs of the rural areas and, in addition to safeguarding several established employment sites, has made an additional allocation at Withington. Further, the Council's statement indicates that there is vacant employment land within Weobley and, if necessary, expansion could take place at the established industrial estate at Whitehill. In my opinion, there is no overriding case for a new allocation on the objection site.

6.27.3 In any event, I do not consider that the objection site is well located for employment development or mixed uses including employment. It is outside the settlement boundary and the built-up limits of Weobley. In addition, it is not directly accessible from main roads. Commercial traffic would be drawn through the village centre and past existing schools. I appreciate that the Whitehill Park

and Kington Road Industrial Estates are outside the settlement boundary; but there is the major advantage of access to the A4112 and B4230. In all the circumstances, no modification of the Plan is necessary.

RECOMMENDATION

6.27/1 Do not make any modification in response to the objection.

6.28 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - WITHINGTON - NORTH OF RAILWAY HOUSE

Objection

P921/2659 Mr P Hill

Summary of Objection / Issue

- Land north of Railway House should be allocated for a form of employment land uses. (921)

Inspector's Reasoning and Conclusions

Employment land uses on land north of Railway House - 921

6.28.1I have considered, first of all, whether sufficient land has been allocated for employment purposes and whether there is a need for an additional allocation at Withington. In the context of Policy S4, I have determined that, across the county, too much land has been allocated and that reductions should be made. However, there is still a need to ensure an adequacy of supply in rural areas such as Withington.

6.28.2In Withington, and in addition to minor opportunities within and around the village, local employment is available at the Whitestone Business Park. The Council's statement indicates that 0.66 ha are still undeveloped. In addition, 2.9 ha of land to the east of the business park were allocated at the revised deposit stage. There are no objections to this allocation and I would expect this provision to be carried forward into the adopted UDP. This allocation post-dates this objection and others from the first deposit stage.

6.28.3In my opinion, a sufficiency of land has been allocated at Withington. There is no need for an additional allocation. In any event, I do not consider that either the whole or part of the land north of Railway House would be suitable for employment development. It comprises a flat grassed paddock. Although it is opposite the business park, it is clearly detached from it and has a rural setting. No modification of the Plan is necessary or appropriate.

RECOMMENDATION

6.28/1 Do not make any modification in response to the objection.

6.29 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - WITHINGTON - POMONA CORNER COTTAGE

Objection

P921/2663 Mr P Hill

Summary of Objection / Issue

- Land at Pomona Corner Cottage should be allocated for a form of employment land uses. (921)

Inspector's Reasoning and Conclusions

Employment land uses at Pomona Corner Cottage - 921

6.29.1 In Section 6.28 above, I have determined that there is no need for additional employment land to be allocated at Withington. In any event, land including the cottage and garden at Pomona Corner Cottage would not be suitable for this purpose in whole or in part. It is a small parcel of land completely detached from the business park and in a rural setting. Development would be likely to significantly harm the character and appearance of the area as well as causing access problems that would be damaging and expensive to resolve. No modification of the Plan is appropriate.

RECOMMENDATION

6.29/1 Do not make any modification in response to the objection.

6.30 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - WITHINGTON - SOUTHWEST OF RAILWAY BRIDGE

Objection

P921/2661 Mr P Hill

Summary of Objection / Issue

- Land southwest of the railway bridge should be allocated for a form of employment land uses. (921)

Inspector's Reasoning and Conclusions

Employment land uses on land southwest of the railway bridge - 921

6.30.1 In Section 6.28 above, I have determined that there is no need for additional employment land to be allocated at Withington. In any event, land southwest of the railway bridge would not be suitable for this purpose in whole or in part. It

comprises a gently sloping grass paddock / field that is completely detached from the business park and in a rural setting. Development would be likely to significantly harm the character and appearance of the area as well as causing access problems that would be damaging and expensive to resolve. No modification of the Plan is appropriate.

RECOMMENDATION

6.30/1 Do not make any modification in response to the objection.

6.31 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - WITHINGTON - WHITESTONE BUSINESS PARK – LAND TO EAST

Objection

P1070/3241 R J and R E Stevens and Son

Summary of Objection / Issue

- Land east of the Whitestone Business Park should be included. (1070)

Inspector's Reasoning and Conclusions

Land east of Whitestone Business Park - 1070

6.31.1 In the Revised Deposit Draft, the majority of the objection site is now allocated for employment purposes. The exception is an area of redundant farm buildings on the northern part of the site. These buildings lie to the east of a property known as Barnamore House where planning permission for conversion to form five dwellings was granted in 2004. In the circumstances, I do not consider that any further extension of the allocated land would be appropriate.

RECOMMENDATION

6.31/1 Do not make any modification in response to the objection.

6.32 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - WITHINGTON - WHITESTONE BUSINESS PARK - LAND ADJACENT TO A4103

Objection

P105/300 Collins Engineering Ltd

Summary of Objection / Issue

- Land adjacent to the A4103 should be allocated for employment purposes. (105)

Inspector's Reasoning and Conclusions

Land adjacent to the A4103 – 105

6.32.1 The objection site is well related to the Whitestone Business Park. However, although it is flanked by maturing landscaping, it is a prominent site on slightly elevated ground. The visual appearance of the area would be likely to be compromised by standard development. Be that as it may, as determined in Section 6.28 above, there is no need for a further employment allocation in Withington. No modification of the Plan is necessary.

RECOMMENDATION

6.32/1 Do not make any modification in response to the objection.

6.33 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - WITHINGTON – WHITESTONE BUSINESS PARK LOCATION

Objection

P504/6769	Turner and Company
P504/1038	Turner and Company
P504/6768	Turner and Company

Summary of Objection / Issue

- More employment land is needed at the Whitestone Business Park location. (504)

Inspector's Reasoning and Conclusions

More employment land at Whitestone Business Park - 504

6.33.1 I have examined the possibility of extending at the Whitestone Business Park location in Sections 6.31 and 6.32 above. Since the objections were lodged, 2.9 ha of land have been allocated to the east of the business park. I am satisfied that adequate provision has been made and that no modification of the Plan is necessary.

RECOMMENDATION

6.33/1 Do not make any modification in response to the objections.

6.34 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E4 - WITHINGTON - WHITESTONE BUSINESS PARK – ACQUIRED LAND

Objection

P605/6774 Three Counties Planning

Summary of Objection / Issue

- Local businesses at Whitestone should be able to use acquired land for expansion purposes. (605)

Inspector's Reasoning and Conclusions

Use of acquired land at Whitestone - 605

6.34.1 This objection indicates that local companies should be able to use acquired land for expansion of their own business. It is stated that this is specifically relevant to industrial development at Whitestone on a variety of sites. In the absence of further information, there is inadequate justification for modification of the Plan. The general position at Whitestone Business Park and in relation to other identified sites has been examined in relation to other objections.

RECOMMENDATION

6.34/1 Do not make any modification in response to the objection.

6.35 POLICY E4/E5 AND PARAGRAPH 6.4.36 - ALTERNATIVE SITES - MADLEY AIRFIELD

Objection

P1088/10720 MPD Ltd

Summary of Objection / Issue

- The whole of the access bay should be included within the protected employment land. (1088)

Inspector's Reasoning and Conclusions

Access bay - 1088

6.35.1 I appreciate that development opportunities within the access bay are limited. Nevertheless, they cannot be ruled out. The stationing of a security cabin is one possibility. In such circumstances, I consider that the whole of the access bay, being land in the ownership of the objector, should be treated as safeguarded

employment land. In Section 17 of my report, I recommend a related modification of the Proposal Map.

RECOMMENDATION

6.35/1 See Recommendation 17.23/1.

6.36 SAFEGUARDING EMPLOYMENT LAND AND BUILDINGS - POLICY E5 AND PARAGRAPHS 6.5.30 TO 6.5.36

Objections

P250/520	Wacton Coach Sales
P354/670	Madley Parish Council
P635/1540	Campaign to Protect Rural England
P692/1703	Jennings Estates Ltd
P790/1992	West Midlands RSL Planning Consortium
P921/2666	Mr P Hill
P987/2948	Scott Newman Group
P1057/3191	Madley Communications Centre
P1059/3209	Prudential Property Investment Managers Ltd
P1102/3518	H P Bulmer Ltd
P1107/3536	H P Bulmer Ltd and Jennings Estates Ltd
P1178/3727	B&Q Ltd
P991/2962	Mr E Coombs

Summary of Objections / Issues

- The Plan does not allow for any flexibility or expansion of the Linton Trading Estate. (250)
- The travellers' site at Stoney Street, Madley, should be included within the boundary of the industrial estate. (354)
- Safeguarded sites should be reviewed. (635)
- The removal of land surplus to operational requirements should be an additional criterion. (692, 1102, 1107)
- The opportunity to give priority to affordable housing needs has been missed. (790)
- Objection is raised to Policy E5. (921, 987, 991)
- Land to the north of the Stoney Street industrial area, Madley, should be included within the area of safeguarded employment land. (1057)
- Objection is raised to the loss of employment land for non-employment uses. (1059)
- Policy E5 is not sufficiently flexible. (1178)

Inspector's Reasoning and Conclusions

Flexibility or expansion of the Linton Trading Estate - 250

6.36.1 At the revised deposit stage, land south of the Linton Trading Estate was allocated for employment purposes under Policy E3. In my opinion, allowance is now made for flexibility and expansion at the trading estate and no modification of the Plan is necessary.

Travellers' site, Madley - 354

6.36.2 The Parish Council would wish the travellers' site to be included within the boundary of the industrial estate thus reducing any influx of travellers or any further expense to Council tax payers. To my mind, these are not legitimate land use considerations and there is inadequate justification for any modification of the Plan.

Reviewing safeguarded sites - 635

6.36.3 At the inquiry, it was recognised that safeguarded sites have been reviewed by the Council. In this respect, no modification of the Plan is necessary.

Removal of land surplus to operational requirements – 692, 1102, 1107

6.36.4 I can see that there may be cases where surplus operational land is inappropriate for development by other businesses and that consideration of some alternative land use would be appropriate. However, I would expect such cases to be exceptional. Mention within the policy would not be necessary and could give inappropriate encouragement to the loss of potentially important employment land or buildings.

6.36.5 In any event, whether or not a site has become surplus to the operational requirements of the site owner is not on its own an appropriate criterion. In almost all cases, I would expect that employment use by another owner or lessee would be a possibility.

Missed opportunity in respect of affordable housing needs - 790

6.36.6 I do not consider that there has been a missed opportunity in respect of affordable housing. The housing requirement for the county, including provision for affordable housing, would be met through implementation of the various policies in the Plan. In addition, the Council has considered in Document N 2 whether there is potential for land allocated for non-housing purposes to be re-used for other purposes. No modification of the UDP is necessary.

Objection to Policy E5 – 921, 987, 991

6.36.7 Objections are raised to "the terms of Policy E5" or "in its current form". However, no amplification of the objections is given. As such, there is inadequate justification for any modification of the Plan.

Land north of Stoney Street industrial area - 1057

6.36.8 In Section 6.21 above, I have determined that it would not be appropriate to allocate more employment land at Madley Airfield. For similar reasons, extension of the existing safeguarded employment area would not be appropriate. No modification of the Plan is necessary.

Loss of employment land for non-employment uses - 1059

6.36.9 The Prudential objects to the loss of employment land to non-employment uses if the proposal does not adhere to the sequential approach set out in PPG 6 (now PPS 6). For my part, I do not see any need to modify the Plan. Policy E5 deals with circumstances where the loss of employment land could be permissible. However, I would expect the alternative land use to comply with other provisions of the Plan. For example, large scale retail proposals would be subject to the sequential approach set out in Chapter 7 of the Plan.

Flexibility of Policy E5 - 1178

6.36.10 I do not consider that there should be any additional flexibility in respect of retail development on employment land. I appreciate that some retail uses have significant employment benefits. Nevertheless, in accordance with national policy, it is important to try and secure the centralisation of such uses. Further flexibility within the policy would not be appropriate.

RECOMMENDATION

6.36/1 Do not make any modification in response to the objections.

6.37 SAFEGUARDING EMPLOYMENT LAND AND BUILDINGS - POLICY E5 - CO-OP SUPERMARKET, CUSOP

Objections

P832/2166 Co-operative Group (Conditionally Withdrawn)
RP1490/11021 Cusop Parish Council

Summary of Objections / Issues

- The site of the Co-op store, Cusop, should be taken out of Policy E5. (823)
- Whether there is any reason for excluding retail use from the area at Cusop covered by Policy E5. (1490)

Inspector's Reasoning and Conclusions

Co-op store, Cusop

6.37.1 The Revised Deposit Draft has been amended by the exclusion of retail uses from the safeguarded employment land at Cusop. The objection has been conditionally withdrawn and no modification of the Plan is necessary.

Excluding retail use, Cusop - 1490

6.37.2 In my opinion, the correct intention of Policy E5 is to safeguard uses falling within Class B of the schedule to the Town and Country Planning (Use Classes) Order 1987, as amended. This does not include retail uses. These are subject to different policy and locational considerations. No modification of the Plan is necessary.

RECOMMENDATION

6.37/1 Do not make any modification in response to the objections.

6.38 SAFEGUARDING EMPLOYMENT LAND AND BUILDINGS - POLICY E5 – 1 HA OF LAND AT FARADAY ROAD, HEREFORD

Objection

P1115/7502 Bovale Ltd

Summary of Objection / Issue

- 1 ha of land at Faraday Road, Hereford, should be deleted from the safeguarded employment land. (1115)

Inspector's Reasoning and Conclusions

1 ha of land at Faraday Road, Hereford - 1115

6.38.1 Bovale Ltd has made two duly made objections in respect of safeguarded employment land. One relates to a site of 1 ha at Faraday Road, Hereford. The other relates to a larger site of 2.38 ha. However, at the inquiry, it was confirmed that there is in effect one objection site. This is an area slightly smaller than the 2.38 ha site. This is discussed in Section 6.39 below. To this extent, the objection to the site of 1 ha has been overtaken by events and no further action is necessary.

RECOMMENDATION

6.38/1 Do not make any modification in response to the objection.

6.39 SAFEGUARDING EMPLOYMENT LAND AND BUILDINGS - POLICY E5 - 2.38 HA OF LAND AT FARADAY ROAD, HEREFORD

Objection

P1115/3597 Bovale Ltd

Summary of Objection / Issue

- 2.38 ha of land at Faraday Road, Hereford, should be deleted from the safeguarded employment land. (1115)

Inspector's Reasoning and Conclusions

2.38 ha of land at Faraday Road, Hereford - 1115

6.39.1 In Section 3.19 of my report, I reach two conclusions relevant to consideration of the Faraday Road site. First, I note that excessive provision has been made in the Plan for new employment development. Secondly, and in terms of employment land that is already available, there would appear to be no quantitative need for a greater focus on Hereford.

6.39.2 I recognise, however, that there are important qualitative issues. These include questions over the distribution of employment land within the city; also the fact that less than 7% of the employment land in Hereford is classed as readily available. Under Recommendation 3.19/4, I have called for a detailed assessment of these matters.

6.39.3 Be that as it may, I am aware that the future requirement for employment land within the city is likely to be above average. This is because many businesses will be displaced as a result of redevelopment within the Edgar Street grid. The survey of businesses carried out as part of the relocation study (Document N 10) indicates that 29% would prefer to remain in a city centre location. A further 47% would be happy to relocate to an edge of centre location. The majority of businesses stressed that they did not want to be located south of the river. To my mind, these results emphasise the importance of a location such as Faraday Road rather than Rotherwas.

6.39.4 My conclusions on the potential of the site for housing purposes are also relevant. In Paragraph 5.31.8, I note that residential development on the site would not be compatible with nearby industrial activity. Allocation for residential purposes would not be appropriate.

6.39.5 I appreciate that the objection site would not be a suitable location for many businesses; also that the site has been vacant for a considerable length of time. However, bearing in mind likely future conditions in Hereford, I consider that the objection site has important potential. Continued safeguarding under Policy E5 is appropriate in this case.

RECOMMENDATION

6.39/1 Do not make any modification in response to the objection.

6.40 SAFEGUARDING EMPLOYMENT LAND AND BUILDINGS - POLICY E5 - FORMER GAS WORKS, HEREFORD

Objection

P633/1412 SecondSite Property

Summary of Objection / Issue

- Whether the boundary of the safeguarded employment land and buildings should include the former gas works, Hereford. (633)

Inspector's Reasoning and Conclusions

Former gas works, Hereford - 633

6.40.1 Part of the objection has been met in that, in the Revised Deposit Draft, the designation as safeguarded employment land and buildings has been removed from part of the objection site. However, there remains an area to the south that would continue to be safeguarded employment land.

6.40.2 The main justification for removing the designation is the perceived potential for retail warehousing. However, in Section 7.29 of my report, I have determined that extension of the retail warehouse area would not be appropriate.

6.40.3 In my opinion, the residual land has a potential role to play in meeting the future employment needs of Hereford. Indeed, the objection recognises the potential of using the site for employment purposes. In all the circumstances, no modification of the Plan is necessary or appropriate.

RECOMMENDATION

6.40/1 Do not make any modification in response to the objection.

6.41 SAFEGUARDING EMPLOYMENT LAND AND BUILDINGS - POLICY E5 - LAND BETWEEN YAZOR BROOK AND WESTFIELDS TRADING ESTATE, HEREFORD

Objection

P692/7501 Jennings Estates Ltd

Summary of Objection / Issue

- Part of the landholdings of H P Bulmer Ltd should be removed from the employment safeguarding designation. (692)

Inspector's Reasoning and Conclusions

Landholdings of H P Bulmer Ltd - 692

6.41.1 This site logically forms part of the land north of Whitecross School, Hereford. The future of the land is discussed in Section 6.43 below.

RECOMMENDATION

See Recommendation 6.43/1.

6.42 SAFEGUARDING EMPLOYMENT LAND AND BUILDINGS - POLICY E5 DESIGNATION – LAND AT PLOUGH LANE, HEREFORD

Objection

P1102/7498 H P Bulmer Ltd

Summary of Objection / Issue

- Land at Plough Lane, Hereford, should be removed from the Policy E5 designation. (1102)

Inspector's Reasoning and Conclusions

Land at Plough Lane - 1102

6.42.1 Under this objection, no specific case has been put forward in respect of the removal of the employment safeguarding designation from the objection site. Bearing in mind also my conclusion in Paragraph 5.31.47 as to the unsuitability of this site for housing purposes, no modification of the Plan is necessary.

RECOMMENDATION

6.42/1 Do not make any modification in response to the objection.

6.43 SAFEGUARDING EMPLOYMENT LAND AND BUILDINGS - POLICY E5 – LAND NORTH OF WHITECROSS SCHOOL, HEREFORD

Objections

P1102/7500 H P Bulmer Ltd
P1107/3541 H P Bulmer Ltd and Jennings Estates Ltd

Summary of Objections / Issues

- Land north of Whitecross School, Hereford, should be removed from the Policy E5 designation. (1102, 1107)

Inspector's Reasoning and Conclusions

Land north of Whitecross School – 1102, 1107

6.43.1 The land north of Whitecross School, Hereford is an important brownfield site. In terms of its future use, there is a need to reconcile the competing needs of employment and housing.

6.43.2 On the housing side of the balance, it would be appropriate to allocate more housing land, particularly in Hereford, to help meet a slight gap between housing land allocations and the strategic housing requirement stemming from RPG 11. In this regard, maximising the use of previously developed land within the urban area will be an important consideration.

6.43.3 At the same time, within the city, there is a shortage of employment land classed as readily available; also land located within central and north Hereford. This is in circumstances where, as a result of the regeneration of the Edgar Street grid, the future requirement for employment land is likely to be above average. In addition, the demand will be particularly obvious in central Hereford where most businesses displaced by the town centre proposals would wish to relocate.

6.43.4 At the strategic level, I determine in Section 3.19 of my report that excessive provision has been made in the Plan for new employment development. I also note that, in terms of existing employment land, nearly 40% of the supply lies within Hereford. This may be compared with a situation where, over the plan period, under 30% of housing provision is to be made in the city. To my mind, this suggests that, in quantitative terms, existing provision within the city is more than adequate.

6.43.5 I recognise that the overall position is somewhat uncertain and I have called for an assessment of the quantitative and qualitative need for employment land in Hereford (Recommendation 3.19/4). Further, I have concluded that protected employment land at Faraday Road site has important potential in meeting Hereford's needs. However, the Faraday Road site is particularly well located relative to the Edgar Street grid. In addition, conflict with the rendering plant at Sun Valley rules out residential use of the site.

6.43.6 The land north of Whitecross School does not have the same relationship with the city centre. More particularly, it is not affected by the constraint of the rendering plant. In all the circumstances, I have concluded that an allocation for residential purposes is to be preferred. This is the subject of discussion in Section 5.31 of my report. It follows that continued protection of the objection site for employment purposes would not be appropriate.

RECOMMENDATIONS

6.43/1 In respect of land off Yazor Road and north of Whitecross School, remove the designation "Safeguarding Employment Land (E5)" as shown on the Proposals Map.

6.43/2 Do not make any other modification in response to the objections.

6.44 SAFEGUARDING EMPLOYMENT LAND AND BUILDINGS - POLICY E5 – LAND AT WHITECROSS ROAD, HEREFORD

Objection

P1102/7499

H P Bulmer Ltd

Summary of Objection / Issue

- Land at Whitecross Road, Hereford, should be deleted from the Policy E5 designation. (1102)

Inspector's Reasoning and Conclusions

Land at Whitecross Road - 1102

6.44.1 In Section 6.43 above, I discuss the competing merits of housing and employment uses in respect of land off Yazor Road and north of Whitecross School. Similar considerations apply to the Whitecross Road site. In line with the discussion in Section 5.31 on the merits of a housing allocation, I recommend that the safeguarding employment land designation should be removed.

RECOMMENDATIONS

6.44/1 In respect of land at Whitecross Road, remove the designation "Safeguarding Employment Land (E5)" as shown on the Proposals Map.

6.44/2 Do not make any other modification in response to the objections.

6.45 SAFEGUARDING EMPLOYMENT LAND AND BUILDINGS - POLICY E5 – SINC'S AT ROMAN ROAD AND ROTHERWAS

Objection

P602/1341 Herefordshire Nature Trust

Summary of Objection / Issue

- Whether SINC's adjacent to Roman Road and at Rotherwas should be safeguarded employment land. (602)

Inspector's Reasoning and Conclusions

SINC's as safeguarded land - 602

6.45.1 There are two SINC's adjacent to Roman Road and another at Rotherwas that are within areas of safeguarded employment land. However, I do not consider that this raises any particular problems. Notwithstanding the Policy E5 designation, the requirements of Policy NC4 would need to be met within the SINC's. It is helpful to draw attention to the presence of Policy NC4 through the notation and no modification of the Plan is necessary.

RECOMMENDATION

6.45/1 Do not make any modification in response to the objection.

6.46 SAFEGUARDING EMPLOYMENT LAND AND BUILDINGS - POLICY E5 - BROADMEADOWS INDUSTRIAL ESTATE, ROSS-ON-WYE

Objection

P195/424 Yorkley Timber Co Ltd

Summary of Objection / Issue

- Whether land at Broadmeadows Industrial Estate should be indicated as additional safeguarded employment land. (195)

Inspector's Reasoning and Conclusions

Land at Broadmeadows Industrial Estate - 195

6.46.1 In the Revised Deposit Draft, the objection site has been designated under Policy E5. The agent has confirmed that the objection has been met. No modification of the Plan is necessary.

RECOMMENDATION

6.46/1 Do not make any modification in response to the objection.

6.47 NEW EMPLOYMENT LAND ALLOCATIONS - POLICY E5 ADDITIONAL AREA - SHOBDON AIRFIELD - ADJACENT TO KINGSPAN

Objection

P109/320 Mr R H Morris

Summary of Objection / Issue

- Whether land adjacent to Kingspan Industrial Estate should be allocated as additional land for general industrial purposes. (109)

Inspector's Reasoning and Conclusions

Land adjacent to Kingspan Industrial Estate - 109

6.47.1 In Section 6.21 above, in the context of Madley Airfield, I have considered the appropriateness of locating employment development in rural areas. Similar considerations apply in respect of Shobdon Airfield.

6.47.2 Shobdon Airfield was built for use in time of war. Over the years, the associated hangars have been utilised for industrial uses. It has become an established employment site and is now the location of one of Herefordshire's

major employers, Kingspan Insulation Ltd. As such, it is safeguarded employment land.

6.47.3I appreciate that the objection site is away from housing and is located between an industrial area and gravel pits. However, it is not in a location where new employment development would normally be encouraged. Further, although there is access to the road network, HGVs would have to pass through Shobdon or Pembridge. This would be undesirable. In any event, a sufficiency of employment land to serve the rural areas has been allocated under the UDP.

6.47.4I am aware that there is planning permission for the parking of lorry trailers on part of the objection site. However, this is a temporary use and, to my mind, does not justify a designation as safeguarded employment land. In any event, the remainder of the land is a large, open, flat, arable field that lacks defined boundaries or tree cover. In all the circumstances, there is no justification for extending the safeguarded employment land designation or for allocating additional land for employment purposes. No modification of the Plan is necessary.

RECOMMENDATION

6.47/1 Do not make any modification in response to the objection.

6.48 SAFEGUARDING EMPLOYMENT LAND AND BUILDINGS - POLICY E5 - EAST OF WHITESTONE BUSINESS PARK

Objection

P918/2625 Messrs R and G Stevens

Summary of Objection / Issue

- Whether land east of Whitestone Business Park should be designated as safeguarded employment land. (918)

Inspector's Reasoning and Conclusions

Land east of Whitestone Business Park - 918

6.48.1In the Revised Deposit Draft, much of the objection site has been allocated for employment purposes under Policy E3. In the related part of my report, I have discussed the case for further extending the business park. Similar considerations apply with regard to safeguarded employment land. There is inadequate justification for modifying the Plan.

RECOMMENDATION

6.48/1 Do not make any modification in response to the objection.

6.49 EXPANSION OF EXISTING BUSINESSES - POLICY E6 AND PARAGRAPH 6.5.1

Objection

P605/3037 Three Counties Planning

Summary of Objection / Issue

- Companies should be assured that they can utilise for their own businesses adjacent land acquired for expansion. (605)

Inspector's Reasoning and Conclusions

Utilising land acquired for expansion - 605

6.49.1 This objection has been made with particular reference to Whitestone Business Park. However, from a reading of Paragraph 6.4.36 of the Plan, it is not entirely clear whether the expansion of existing businesses at Whitestone Business Park would be considered under Policy E6. The paragraph could be read as applying only to Shobdon and Madley Airfields and to Hergest Camp. This is not the intention. The paragraph should be clarified as recommended below.

RECOMMENDATIONS

6.49/1 In Paragraph 6.4 36, delete the words "(this does not relate to expansion of existing businesses on these estates which will be considered under policy E6)." At the end of the same paragraph, insert the following: "The expansion of existing firms on land in the rural areas designated as safeguarded employment land will be considered under Policy E6."

6.49/2 Do not make any other modification in response to the objection.

6.50 OTHER EMPLOYMENT PROPOSALS WITHIN AND AROUND HEREFORD AND THE MARKET TOWNS - POLICY E7 AND PARAGRAPHS 6.5.2 TO 6.5.3

Objection

P388/831 Mr D Boynton and Son (Conditionally Withdrawn)

Summary of Objection / Issue

- Farmyards should be included within the definition of previously developed land. (388)

Inspector's Reasoning and Conclusions

Farmyards as previously developed land - 388

6.50.1 The objection has been conditionally withdrawn following changes in the Revised Deposit Draft. Amongst other things, these make clear that employment proposals on previously developed land adjacent to a settlement boundary may be considered. I note, however, that the glossary does not define previously developed land. As such, I would expect the definition in PPG 3 to be used. This indicates that agricultural land and buildings are excluded from the definition. In such terms, the precise change sought by the objector would not be appropriate.

RECOMMENDATION

6.50/1 Do not make any modification in response to the objection.

6.51 DESIGN STANDARDS FOR EMPLOYMENT SITES - POLICY E8 AND PARAGRAPHS 6.5.4 TO 6.5.6

Objections

P864/2356 Transport 2000
P865/2423 Cyclists' Touring Club

Summary of Objections / Issues

- Pedestrian and cycle links should be of a high quality. (864, 865)
- There should be reference to individual travel plans and to related policies. (864, 865)

Inspector's Reasoning and Conclusions

High quality pedestrian and cycle links – 864, 865

6.51.1 In my opinion, the point made by the objectors is addressed elsewhere in the Plan. For example, Policy S2 requires high standards of design and layout. No modification of the Plan is necessary.

Individual travel plans and related policies – 864, 865

6.51.2 The Revised Deposit Draft now refers to travel plans rather than green transport plans. Bearing in mind also that no evidence was presented at the inquiry on the related policies point, I do not consider that any further action is necessary.

RECOMMENDATION

6.51/1 Do not make any modification in response to the objections.

6.52 HOME BASED BUSINESSES - POLICY E9 AND PARAGRAPHS 6.5.7 TO 6.5.8

Objections

P685/1684 Tufnell Town and Country Planning
W280/1267 Mr R Gill

Summary of Objections / Issues

- Live-work units should be encouraged. (685)
- Working from home should be encouraged. (280)

Inspector's Reasoning and Conclusions

Live-work units - 685

6.52.1I do not consider that specific reference to live-work units is necessary. Live-work units can lead to enforcement issues particularly in the event of business failures. For example, in the open countryside, there could be pressure to convert the live-work unit into a dwelling. In any event, they can be considered within the overall framework of planning policies set out in the Plan. No modification is necessary.

Working from home - 280

6.52.2I appreciate that working from home can give rise to many benefits. Reducing the need to commute is noted in Paragraph 6.5.7. Other potential benefits would include reduced pollution, energy consumption and traffic related costs. In addition, home working can contribute to the local economy. However, I do not consider that the potential benefits need to be set out in the Plan or that greater encouragement to home working is needed. To my mind, the benefits are implicitly recognised in a permissive policy that, where necessary, would enable home working to be permitted.

6.52.3With regard to matters such as improving and facilitating broadband access, these are outside the scope of a land use plan. No modification of the UDP is necessary.

RECOMMENDATION

6.52/1 Do not make any modification in response to the objections.

6.53 EMPLOYMENT PROPOSALS WITHIN OR ADJACENT TO MAIN VILLAGES - POLICY E10 AND PARAGRAPHS 6.5.9 TO 6.5.11

Objections

P846/2233 Country Land and Business Association

P987/2950	Scott Newman Group
P653/1501	Mr B McIlwrick
P918/2637	Messrs R and G Stevens
P923/2668	Messrs D, R and J Ewens
P991/2964	E Coombs and M Freeman

Summary of Objections / Issues

- Whether the policy should be extended to include any established settlement; also farm or business complexes or sustainable greenfield sites. (846, 653)
- Specific objection is made to the terms of Policy E10. (987, 918, 991)
- Provision for live-work units, specifically in rural areas, should be included within the Plan. (923)

Inspector's Reasoning and Conclusions

Extending the scope of the policy – 846, 653

6.53.1 In the Revised Deposit Draft, certain amendments to the policy provisions have been made. For example, under Policy E11, employment in the smaller settlements and the open countryside would be considered. Specific reference is made to farm diversification projects and to identified established employment areas. The provisions would cover sites that would not be greenfield sites.

6.53.2 In my opinion, the encouragement afforded by the policies is set in the context of appropriate criteria and can be applied to all relevant cases in rural areas. No modification of the Plan is necessary.

Specific objection to the terms of Policy E10 – 987, 918, 991

6.53.3 The objections all indicate that specific objection is made to the terms of Policy E10. However, no details are given. In the circumstances, there is inadequate justification for any modification of the Plan.

Provision for live-work units - 923

6.53.4 I have considered live-work units in Section 6.52 of my report. The same sort of considerations apply to the objection of Messrs Ewens. No modification of the Plan is necessary.

RECOMMENDATION

6.53/1 Do not make any modification in response to the objections.

6.54 EMPLOYMENT IN THE SMALLER SETTLEMENTS AND OPEN COUNTRYSIDE - POLICY E11 AND PARAGRAPHS 6.5.12 TO 6.5.13

Objections

P11/309 Wall, James and Davies (Solicitors)

P44/218	National Farmers' Union
P846/2234	Country Land and Business Association
P846/11220	Country Land and Business Association
P987/2951	Scott Newman Group
P109/306	Mr Mr R H Morris
W321/940	Mrs E Newman
P653/1503	Mr B McIlwrick
P918/2638	Messrs R and G Stevens
P946/2744	Mr M B Roberts
P991/2965	E Coombs and M Freeman
P1079/3309	Mr N Read and Ms A Holden

Summary of Objections / Issues

- Re-use of rural buildings should not be restricted to traditional buildings. (11)
- Farm diversification should not be reliant on there being no other site in or adjoining a settlement. (44)
- All references to "small scale" should be changed to "appropriate". (846)
- The policy should refer to existing settlements rather than smaller settlements. (846)
- Objection is made to the terms of Policy E11. (987, 918, 991)
- In some cases, employment would be better located next to existing industrial areas rather than residential areas. (109)
- There is a need for a much stronger policy on existing employment areas in the countryside. (321)
- Employment should be further encouraged when adjacent to defined small settlements. (653)
- Policy E11 needs amendment to incorporate recreational, leisure and other facilities in the countryside. (946)
- The blanket provision against large scale development should be removed. (1079)

Inspector's Reasoning and Conclusions

Traditional buildings - 11

6.54.1 In the Revised Deposit Draft, the re-use of rural buildings under Policy E11 is no longer restricted to traditional buildings. This is as a result of changes to Policies HBA12 and 13, policies that are cross-referred to in Policy E11. No modification of the Plan is necessary.

Farm diversification - 44

6.54.2 The reference to there being no other site in or adjoining a settlement has been omitted from the revised deposit version of the Plan. I consider that the objection has been met and that no modification of the Plan is necessary.

References to "small scale" - 846

6.54.3 In the Revised Deposit Draft, references to "small scale" have been deleted. This change is supported by the objector. No further action is necessary.

Reference to existing settlements rather than smaller settlements - 846

6.54.4I do not consider that it would be appropriate for Policy E11 to refer to "existing settlements". Such a change would indicate that the policy should apply to all settlements within the rural area. However, in line with the strategy adopted throughout the Plan, a distinction is made between the main villages and the smaller settlements. Employment in main villages is dealt with separately in Policy E10. No modification of the Plan is necessary.

Objection to the terms of Policy E11 – 987, 918, 991

6.54.5 The objections all indicate that specific objection is made to the terms of Policy E11. However, no details are given. In the circumstances, there is inadequate justification for any modification of the Plan.

Employment next to existing industrial areas - 109

6.54.6In Section 6.21 of my report, I have considered the Council's strategy for locating employment development in rural area. I acknowledge that there are a number of established employment sites that are not next to residential areas. However, they have usually grown for historical reasons and are not in locations where employment development would normally be encouraged. Although the position of existing employers is safeguarded under the provisions of the Plan, I do not consider that new employment development should be encouraged in outlying areas. No modification of the Plan is appropriate.

Stronger policy on existing employment areas - 321

6.54.7The points of concern to the objector cannot be dealt with retrospectively through a policy in the Plan. However, landscaping and visual improvements can be addressed at the time planning applications are considered and in accordance with policies elsewhere in the Plan. Clearing up areas such as Hergest Camp and the breaches of planning control to which reference is made are not matters for a development plan.

Encouraging employment adjacent to small settlements - 653

6.54.8In the Revised Deposit Draft, Policy E11 specifically addresses employment within or adjoining smaller settlements. In the light of the changes, I consider that the objection has been met.

Incorporating recreational, leisure and other facilities - 946

6.54.9Chapter 6 of the Plan deals with business, industrial and storage or distribution uses. Hotel proposals and visitor accommodation fall under the tourism heading and are dealt with under Policy RST12. Inclusion under Policy E11 is not necessary or appropriate.

Large scale development - 1079

6.54.10 As indicated by the Council, large scale development in the countryside will not normally be appropriate. It is important to make this clear in the development plan. However, exceptions can always be considered and allowed where other matters are of overriding importance.

RECOMMENDATION

6.54/1 Do not make any modification in response to the objections.

6.55 FARM DIVERSIFICATION - POLICY E12 AND PARAGRAPH 6.5.14

Objections

P11/551 Wall, James and Davies (Solicitors)
P44/219 National Farmers' Union
P685/1686 Tufnell Town and Country Planning

Summary of Objections / Issues

- Use of existing buildings should not be restricted to traditional buildings. (11)
- There is no need to mention scale in criterion 2. (44)
- There should be broad definitions of farm diversification and the rural economy. (685)

Inspector's Reasoning and Conclusions

Traditional buildings - 11

6.55.1 In the Revised Deposit Draft, the use of existing buildings under Policy E12 is no longer restricted to traditional buildings. This is as a result of changes to Policies HBA12 and 13, policies that are cross-referred to in Policy E12. No modification of the Plan is necessary.

Mention of scale - 44

6.55.2 Reference to scale in the second criterion of Policy E12 has been omitted in the revised deposit version of the Plan. I consider that the objection has been met and that no further action is necessary.

Definitions of farm diversification and the rural economy - 685

6.55.3 I consider that farm diversification and the rural economy are familiar terms that are widely understood. There is no suggestion that a narrow definition is intended in the context of the Herefordshire UDP. Bearing in mind also the explanation given in the text, and the instances set out in Policy PA15 of RPG 11, I do not consider that specific definitions are necessary or appropriate.

RECOMMENDATION

6.55/1 Do not make any modification in response to the objections.

6.56 CONVERSIONS OF LARGE DWELLINGS TO EMPLOYMENT USES - POLICY E14 AND PARAGRAPHS 6.5.16 TO 6.5.17

Objection

P864/2358 Transport 2000

Summary of Objection / Issue

- The motor transport impact of development should be minimised. (864)

Inspector's Reasoning and Conclusions

Motor transport impact - 864

6.56.1 The revised deposit version of the policy states that proposals should include measures for improving access by employees by alternative means of transport including travel plans. In this way, I would expect the motor transport impact of the proposed development to be minimised. No modification of the Plan is necessary.

RECOMMENDATION

6.56/1 Do not make any modification in response to the objection.

6.57 PROTECTION OF GREENFIELD LAND - POLICY E15 AND PARAGRAPHS 6.5.18 TO 6.5.20

Objections

P635/1544	Campaign to Protect Rural England
P109/307	Mr R H Morris
P653/1505	Mr B McIlwrick

Summary of Objections / Issues

- Considerably greater protection should be afforded to agricultural land. (635)
- The policy should allow for use of greenfield land adjacent to existing industrial areas. (109)
- Development within smaller settlements can often be sustainable. (653)

Inspector's Reasoning and Conclusions

Greater protection to agricultural land - 635

6.57.1 At the inquiry, and in the light of the guidance in PPS 7, the CPRE did not wish to pursue its duly made objection. No further action is necessary.

Use of greenfield land adjacent to existing industrial areas - 109

6.57.2 The objector states that any loss of green fields should be adjacent to existing industrial estates. In this regard, I can appreciate that proximity to an existing employment area could be relevant in the identification of new employment land. However, in terms of sustainable development, location is perhaps the main determinant particularly the location of new employment development close to existing centres of population.

6.57.3 The Kingspan Industrial Estate, for example, is remote from large pools of labour. To encourage development next to this estate would likely increase the need to travel by car as employees would be drawn from further and further afield. Whilst the needs of existing companies need to be safeguarded, there is no justification for favouring the development of greenfield land that is adjacent to existing industrial areas.

Development within smaller settlements - 653

6.57.4 I do not consider that Policy E15, read in conjunction with other policies, is overly restrictive. For example, Policy E11 makes allowance for development within smaller settlements. No modification of the Plan is necessary.

RECOMMENDATION

6.57/1 Do not make any modification in response to the objections.

6.58 INTENSIVE LIVESTOCK UNITS - POLICY E16 AND PARAGRAPHS 6.5.21 TO 6.5.24

Objections

P358/739	Environment Agency
P635/1545	Campaign to Protect Rural England
P864/4225	Transport 2000
P1071/3291	English Nature (Conditionally Withdrawn)

Summary of Objections / Issues

- Reference should be made to the need for an IPPC permit for intensive livestock units. (358)
- The policy is not sufficiently discouraging. (635)
- Structures arising from new agricultural techniques should be addressed. (635)
- Whether vulnerable road users would be catered for adequately. (864)
- Insufficient recognition is given of pollution impacts on biodiversity features. (1071)

Inspector's Reasoning and Conclusions

Reference to IPPC permit - 358

6.58.1 The need for compliance with any statutory environmental quality standards or objectives is a matter that should be considered in the preparation of development plan documents (PPS 23, Appendix A). In this vein, I consider that it would be appropriate to refer to the need for an IPPC permit for intensive livestock units. No policy provision is being made. However, an appropriate reference would be helpful and I recommend accordingly.

Discouraging policy - 635

6.58.2 The CPRE would wish to see a requirement that the buildings and associated works should be removed when their present use ceases. In this regard, planning policy is not able to require existing permanent buildings to be demolished. In respect of new permissions, and provided the development met the criteria in the policy, I do not see why subsequent removal would be necessary or appropriate.

6.58.3 The objector also considers that there should be a presumption against any new proposals unless they can meet strict sustainability criteria. In this regard, I consider that appropriate criteria are included in the policy. A land use plan should not be dictating agricultural practices.

Structures arising from new agricultural techniques - 635

6.58.4 The second part of the CPRE's objection is essentially about polytunnels. Inclusion within a section on intensive livestock units would not be appropriate. I have, however, considered whether adding further policies would be appropriate. In this regard, and in those cases where planning permission is required for these or other structures, I consider that all relevant matters are covered by other policies in the Plan. No specific policies are required and no modification of the UDP is necessary.

Vulnerable road users - 864

6.58.5 Under criterion 4 of Policy E15, the interests of highway safety, the matter of significant increases in traffic volumes and HGV movements would all be taken into account. In this way, I consider that the interests of vulnerable road users would be addressed and that no modification of the Plan is necessary.

Pollution impacts on biodiversity features - 1071

6.58.6 Paragraph 6.5.21 of the Revised Deposit Draft now makes reference to pollution of biodiversity features. The objection has been conditionally withdrawn and no further action is necessary.

RECOMMENDATIONS

6.58/1 Add a new paragraph ahead of Policy E16 stating: "Intensive livestock units for poultry are now covered by new legislation. For new poultry units above 40,000 birds and for substantial extensions to existing units, an IPPC permit must be obtained from the Environment Agency."

6.58/2 Do not make any other modification in response to the objections.

6.59 HIGH VALUE / VALUE ADDED FOOD / CROP RELATED INITIATIVES – NEW POLICY

Objection

P864/2362

Transport 2000

Summary of Objection / Issue

- High value and value added food should be encouraged as well as related initiatives. (864)

Inspector's Reasoning and Conclusions

High value and value added food - 864

6.59.1 To my mind, the promotion of high value crops and value added food is outside the control of the planning system. For example, it would be inappropriate to promote alternatives to potatoes in parts of the lower Wye Valley notwithstanding problems on the road network particularly at harvest time. No modification of the Plan is necessary.

RECOMMENDATION

6.59/1 Do not make any modification in response to the objection.

6.60 CADBURY LIMITED, MARLBROOK – SPECIAL MENTION

Objection

P944/2738 Cadbury Limited

Summary of Objection / Issue

- Whether there should be special mention of Cadbury's facility at Marlbrook. (944)

Inspector's Reasoning and Conclusions

Cadbury's facility at Marlbrook - 944

6.60.1 I appreciate that Cadbury's facility at Marlbrook is specifically mentioned within the adopted Leominster District Local Plan. However, the Herefordshire UDP covers the whole of the county and, to my mind, unnecessary reference to specific sites should be avoided. In this regard, I am satisfied that the interests of Cadbury Limited are safeguarded under the provisions of Policies E5 and E6 and that no modification of the Plan is necessary.

RECOMMENDATION

6.60/1 Do not make any modification in response to the objection.