

8. TRANSPORT

8.1 INTRODUCTION - PARAGRAPHS 8.1.1 TO 8.1.3

Objections

P830/2290	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P898/2552	Herefordshire Green Party
P1098/3485	G F M Dawe

Summary of Objections / Issues

- There is a contradiction between increased mobility and reducing the need to travel. (830)
- Whether the title of the chapter should be changed. (898)
- The improvement of key transport routes and the provision of new routes will serve to increase the need to travel. (1098)

Inspector's Reasoning and Conclusions

Contradiction between increased mobility and reducing the need to travel - 830

8.1.1 The objector's concerns have been met in the Revised Deposit Draft. The objection has been conditionally withdrawn and no modification of the Plan is necessary.

Chapter title - 898

8.1.2 The Herefordshire Green Party is concerned that the title "Transport" implies vehicular movement. Terms such as movement, mobility or access are preferred. To my mind, transport is an all embracing term that covers a variety of modes. I do not consider that undue emphasis is given to vehicular transport or that sustainability objectives become subordinate. Indeed, Government guidance such as PPG 13 uses the title "Transport". No modification is required.

Improvement and provision of transport routes - 1098

8.1.3 In addition to reducing the need to travel, especially by car, the Government wishes to promote more sustainable transport choices as well as accessibility by a variety of non-car modes. In relation to these objectives, and the provisions of the Plan, I do not consider that improving key transport routes or providing new routes, particularly in relation to new built development, will produce "irresolvable conflicts". It will, of course, be necessary to make appropriate decisions in each particular case.

RECOMMENDATION

8.1/1 Do not make any modification in response to the objections.

8.2 AIMS AND OBJECTIVES – PARAGRAPHS 8.2.1 TO 8.2.2

Objections

P520/1061	Bromyard and Winslow Town Council
P520/1074	Bromyard and Winslow Town Council
P830/2291	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P898/2553	Herefordshire Green Party
P1114/3584	Hereford City Cycle Forum
P1086/3444	J W Hope
P1098/3486	G F M Dawe

Summary of Objections / Issues

- The private motor car is the only sensible means of transport in northeast Herefordshire. (520)
- The problems faced by industrial traffic are completely ignored. (520)
- There could be problems associated with the safeguarding of land for new transport routes. (830, 1114)
- The hierarchy of modes of travel should be re-instated. (898)
- Traffic problems on the A44, A480 and A4111 need to be dealt with as a whole. (1086)
- The objective of safeguarding routes should be removed. (1098)

Inspector's Reasoning and Conclusions

Car use in northeast Herefordshire - 520

8.2.1 I acknowledge that there are circumstances where, in parts of northeast Herefordshire as in other parts of the county, the private car is the only sensible mode of transport. Such difficulties are recognised in Paragraph 8.3.3 and no modification of the Plan is necessary.

Problems faced by industrial traffic - 520

8.2.2 One of the objectives set out in Paragraph 8.2.2 is the safeguarding of land for the provision of new transport routes. This provision would cover industrial access roads. Justified schemes are identified in Policy T10. In addition, the improvement of existing routes is also mentioned in the paragraph. Again, this would be of benefit to industrial traffic. No modification of the Plan is necessary.

Hierarchy of modes - 898

8.2.3 The transport chapter refers to the hierarchy of modes in several places. However, the hierarchy is not set out in the Plan. Instead reference has to be made to the Local Transport Plan. To my mind, given that the hierarchy of

transport modes is an important consideration, it should be set out in the adopted Plan. I recommend accordingly.

Safeguarding of land for new transport routes – 830, 1114

8.2.4 It appears to me that, in effect, the objector is seeking the safeguarding of a network of routes for pedestrian and cyclists. However, safeguarding is intended to apply to specific projects. In this regard, no specific network or part network is being promoted under the development plan. As such, there is nothing to safeguard.

8.2.5 To provide for and encourage new and improved routes for walking and cycling is, of course, a specific yet separate objective within Paragraph 8.2.2. A network of pedestrian and cycle routes could be promoted in pursuance of this objective and no modification of the Plan is necessary.

Traffic problems on the A44, A480 and A4111 - 1086

8.2.6 The objector has not expanded upon the perceived problem or indicated what change is sought. There is inadequate justification for any modification of the Plan.

Safeguarding routes - 1098

8.2.7 I do not consider that the objective of safeguarding land for the provision of new or improved transport routes should be removed. Paragraph 5.22 of PPG 12 supports the safeguarding of transport routes. Whether or not specific routes are justified does not fall to be considered under this part of the Plan.

RECOMMENDATIONS

8.2/1 In the introduction to the transport chapter, refer to and set out the hierarchy of transport modes (Local Transport Plan (Document Q 11), Page 7).

8.2/2 Do not make any other modification in response to the objections.

8.3 PUBLIC TRANSPORT FACILITIES - POLICY T1 AND PARAGRAPHS 8.4.1 TO 8.4.4

Objections

W323/2851	CTC Right to Ride, Ledbury (Conditionally Withdrawn)
P635/1571	Campaign to Protect Rural England
P635/11440	Campaign to Protect Rural England
P830/2295	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P830/2297	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P830/2299	Herefordshire Friends of the Earth
P830/500233	Herefordshire Friends of the Earth
P864/2366	Transport 2000
P864/4239	Transport 2000
P865/2427	Cyclists' Touring Club
P865/4349	Cyclists' Touring Club
P1090/11142	Network Rail Infrastructure Ltd

P1113/3567	Rail for Herefordshire
P1113/3569	Rail for Herefordshire
P1114/3586	Hereford City Cycle Forum
P1150/3661	Strategic Rail Authority
P1150/11233	Strategic Rail Authority
P1185/500171	Tesco Stores Ltd
P356/675	Mr J V Harding
RP1361/10311	Mr N Jones

Summary of Objections / Issues

- Reference to there being no case for a shared terminal at Ledbury should be removed. (323)
- Whether amended provision should be made in respect of an integrated transport interchange for Hereford. (635, 830, 1113, 1185, 1361)
- Whether there should be improved provision at Leominster. (635, 864, 865, 1113)
- There should be proposals for safeguarding bus lanes and reallocating road space to sustainable road users. (830, 1114)
- Whether the provisions are sufficiently wide. (1864, 1865)
- Safeguarded land should be released if implementation within the Plan period is unlikely. (1090)
- There is scope for improvement at Ledbury. (1113)
- Proposals for re-opening rail stations should not compromise the rail authority's strategic objectives. (1150)
- Reference should be made to documents and requirements of the Strategic Rail Authority. (1150)
- The case for a rail-based park and ride at Withington is questioned. (1150)
- The Council needs to establish a coordinated country public transport system. (356)

Inspector's Reasoning and Conclusions

Shared terminal at Ledbury - 323

8.3.1 Reference to there being no case for a shared terminal at Ledbury has been omitted from the Revised Deposit Draft. The objection has been conditionally withdrawn and no modification of the Plan is necessary.

Integrated transport interchange for Hereford – 635, 830, 1113, 1185, 1361

8.3.2 In my opinion, there is a lack of clear vision regarding future provision for public transport in Hereford city centre. I am left wondering what sort of new facilities are called for and where they would be located. In this regard, there is even a lack of unanimity in documents that have informed the UDP. To my mind, a firm public transport strategy is still outstanding.

8.3.3 I can see the initial attraction of concentrating new facilities at the railway station. However, this is a location that is removed from the main destination of

the majority of bus passengers. Further, from what I saw of the site, I would say that there are severe physical limitations on what could be achieved without major disruption. In the future, I would expect some sort of enhanced provision for buses; also good integration between buses serving the railway station and those serving the heart of the city. However, much of this could be achieved under the general provisions of Policy T1 or without reference to the development plan.

8.3.4 As to the identification of a site for a main bus interchange, the Plan refers to a number of possibilities. One of these is the livestock market site. In that there could be opportunities arising out of the comprehensive redevelopment of this area, and its funding, it seems sensible to me to flag up this possibility. I note, however, that there is no obligation to provide an interchange at this location. At the same time, other possibilities can be identified. These include Blueschool Street / Newmarket Street. Again, it seems sensible to refer to candidate sites.

8.3.5 I conclude that it would have been better to include a specific proposal for a bus interchange in an optimum location. However, given uncertainties about implementation of redevelopment proposals, lack of consensus amongst interested parties and the absence of a firm public transport strategy, I consider that the flexibility afforded by the Plan is the way forward. To this extent, no modification of the Plan is necessary.

Improved provision at Leominster - 635, 864, 865, 1113

8.3.6 It is clear to me that, given the distance from the town centre, a single-site public transport interchange at Leominster station would not make sense. Having said that, many improvements to facilities and service could be effected without recourse to the development plan. Physical improvements, for example to the railway station forecourt, could be implemented under Policy T1. No modification of the Plan is necessary.

Safeguarding bus land and reallocating road space – 830, 1114

8.3.7 Paragraph 8.4.1 of the Revised Deposit Draft states that proposals for reallocation of road space for bus priority or for cycle or pedestrian improvements in urban areas are being developed through the Local Transport Plan. They will be implemented, where appropriate, to improve the quality of bus services. In this regard, no specific schemes with land-take implications are identified in the Plan. I would expect provision to be effected through the management of space within existing highways. No safeguarding would be necessary.

8.3.8 However, the improvement of the quality of bus services is not the only objective of provision. I am recommending an appropriate modification.

Whether the provisions are sufficiently wide - 1864, 1865

8.3.9 Giving priority to more sustainable transport users, compliance with Policy T16 and underpinning the role of existing and new railway stations are matters that have been addressed through changes in the Revised Deposit Draft. No modification of the Plan is necessary.

Release of safeguarded land - 1090

8.3.10 I agree that safeguarded land should be released where there are proposals that are no longer likely to be implemented. Paragraphs 6.24 to 6.26 of PPG 12 contain guidance in this regard. Such advice can be acted upon, and safeguarded

land released, if the studies envisaged in the Plan suggest that implementation would be unlikely.

Scope for improvement at Ledbury - 1113

8.3.11 The objector indicates that there is scope for more frequent stopping of buses at Ledbury station and more information. However, these are not matters for the development plan and no related modification is necessary.

Rail authority's strategic objectives - 1150

8.3.12 Paragraph 8.4.4 of the Revised Deposit Draft states that all potential station re-openings will need to be acceptable to the Strategic Rail Authority. In this way the authority's strategic objectives would be taken into account and no modification of the Plan is necessary.

Documents and requirements of the Strategic Rail Authority - 1150

8.3.13 I do not consider that it would be appropriate for the rail authority's policy documents and guidance to be referred to in the Plan. Referring to the documents would unnecessarily lengthen the Plan. The references could also become out of date. Compliance with policy and guidance would be achieved through consultation with the Strategic Rail Authority. No modification of the Plan is necessary.

Rail-based park and ride at Withington - 1150

8.3.14 I note the reservations of the Strategic Rail Authority in respect of the business case for a rail-based park and ride at Withington. However, there is no commitment in this regard. I see the proposal as an option that the Council wishes to investigate. The business case would be determined through such an investigation and no modification of the Plan is necessary.

Coordinated country public transport system - 356

8.3.15 Whilst the land use aspects of public transport are dealt with in development plans, coordination of the system is essentially effected through the Local Transport Plan. Paragraph 8.4.1 of the Revised Deposit Draft UDP indicates relevant measures that are being taken by the Council and by public transport operators. No modification of the Plan is necessary.

RECOMMENDATIONS

8.3/1 In the penultimate sentence of Paragraph 8.4.1, delete "quality of bus services" and insert "level of service for bus users, pedestrians and cyclists".

8.3/2 Do not make any other modification in response to the objections.

8.4 PUBLIC TRANSPORT FACILITIES – POLICY T1 AND PARAGRAPHS 8.4.1 TO 8.4.4 - BROMYARD - BUS INTERCHANGE

Objection

P520/6450

Bromyard and Winslow Town Council

Summary of Objection / Issue

- A bus turning and waiting area could be provided to the rear of the HSBC Bank, linking to the A44.

Inspector's Reasoning and Conclusions

Provision of bus turning and waiting area - 520

8.4.1 The Council considers it unlikely that adequate turning and waiting space is available in this location. I consider that further investigation would be needed including examination of alternatives before recommending the inclusion of a specific location. There is no current proposal in the Local Transport Plan, which to my mind would be the appropriate means of taking a scheme forward.

RECOMMENDATION

8.4/1 Do not make any modification in response to the objection.

8.5 PUBLIC TRANSPORT FACILITIES – POLICY T1 AND PARAGRAPHS 8.4.1 TO 8.4.4 – GRAFTON – NEW PASSENGER RAIL STATION

Objection

P961/6261 Mr C Morgan

Summary of Objection / Issue

- Land at Grafton should be allocated for a new rail freight and passenger park and ride facility. (961)

Inspector's Reasoning and Conclusions

New station at Grafton - 961

8.5.1 The suitability of this location for a new rail-freight and park and ride facility would need to be confirmed through the Hereford Transport Review. Whilst a site has been identified as an option for park and ride on the A49 south there is insufficient justification at present to make a site specific recommendation.

RECOMMENDATION

8.5/1 Do not make any modification in response to the objection.

8.6 PUBLIC TRANSPORT FACILITIES – POLICY T1 AND PARAGRAPHS 8.4.1 TO 8.4.4 – PONTRILAS

Objection

P495/1027 Dorstone Parish Council

Summary of Objection / Issue

- The rail link at Pontrilas should be opened up as a priority. (495)

Inspector's Reasoning and Conclusions

Rail link at Pontrilas – 495

8.6.1 Policy T1 safeguards land at Pontrilas for this purpose. Proposals to re-open the station could be considered under this policy and taken forward through the Local Transport Plan. No modification to the Plan is necessary.

RECOMMENDATION

8.6/1 Do not make any modification in response to the objection.

8.7 PUBLIC TRANSPORT FACILITIES – POLICY T1 AND PARAGRAPHS 8.4.1 TO 8.4.4 – SHELWICK

Objection

P205/3726 Mr A Gregory

Summary of Objection / Issue

- A passenger station should be located at Shelwick Junction, combined with a park and ride facility and the Hereford Metro. (205)

Inspector's Reasoning and Conclusions

New Station at Shelwick Junction – 205

8.7.1 Policy T1 identifies Withington, Moreton on Lugg and Pontrilas as potential locations for new stations. The suitability of any specific site for a new station linked to park and ride would need to be evaluated through the Local Transport Plan and be agreed by the Strategic Rail Authority. At this stage I have insufficient information to conclude that Shelwick Junction would be the optimum location.

RECOMMENDATION

8.7/1 Do not make any modification in response to the objection.

8.8 PUBLIC TRANSPORT FACILITIES – POLICY T1 AND RAIL FREIGHT – POLICY T4 – MORETON ON LUGG

Objections

P736/1780 Moreton on Lugg Parish Council
P736/1782 Moreton on Lugg Parish Council

Summary of Objections / Issues

- There would be an increase in traffic through Moreton on Lugg if a station was opened here. (736)
- Heavy lorries should be required to use the Moreton Park access rather than travel through the village. (736)

Inspector's Reasoning and Conclusions

Impact of new station at Moreton on Lugg – 736

8.8.1 The Council confirms that the station would be for passenger use only. Whilst I acknowledge that there could be some increase in car traffic through Moreton on Lugg if a station were to be opened, I consider that it is likely to be at a relatively low level and would mostly be confined to the morning and evening peak periods. Passengers from villages to the east of the railway line would not need to pass through Moreton on Lugg.

Access by heavy lorries - 736

8.8.2 Use of the freight transfer facility would be handled in Moreton depot, using its access to the main road. I do not consider that any modification to the Plan is necessary.

RECOMMENDATION

8.8/1 Do not make any modification in response to the objections.

8.9 PUBLIC TRANSPORT FACILITIES – POLICY T1 AND RAIL FREIGHT – POLICY T4 – WITHINGTON

Objections

P253/525 Withington Parish Council
P1150/11233 Strategic Rail Authority
P205/446 Mr A Gregory

P205/447	Mr A Gregory
P775/1931	Mr and Mrs J Bone
P775/1932	Mr and Mrs J Bone

Summary of Objections / Issues

- There is no evidence to support or justify the investment that would be necessary in this location. Insufficient land is available within the railway curtilage for servicing yards. Withington should be removed from the list of sites in Policy E4. (205, 253, 775)
- It is doubtful that a satisfactory business case could be made for a rail-based park and ride at Withington when bus-based schemes are often preferable. (1150)
- The facility would be detrimental to the amenity of residents. (205)
- The site is too far from the village to be an attractive alternative to the bus or the car. The use generated by Whitestone Business Park would be very small. (775)
- Road access would require major improvements, which are not addressed in the Plan. (253, 775)

Inspector's Reasoning and Conclusions

All objections

8.9.1 The Parish Council and other respondents object to the proposal on the basis of lack of demand, lack of rail capacity, significant restrictions on the line for freight use and the lack of any assessment of the impact of the proposal on the environment or the amenity of residents.

8.9.2 In response, the Council argues that few residents would be directly affected, any facility would be expected to be low key, principally to serve the needs of the Whitestone Industrial Estate, and additional road traffic would be minimal and not of a scale to require the safeguarding of road improvements.

8.9.3 Policies T1 and T4 are concerned with safeguarding land for potential rail-related development, based on the precautionary approach set out in the Government's 10-year transport strategy. In my judgment, there is very little evidence of any local demand that might translate into a viable proposal for a rail-freight facility in the current plan period. It is unlikely that there would be sufficient demand for the facility arising from Whitestone Estate to justify the necessary investment.

8.9.4 I accept that this represents one of the limited opportunities where an established industrial estate adjoins the railway, offering at least some potential for reducing dependence on road transport for the movement of freight. However, it is not identified in the Hereford Rail Study (Document Q 8) as a priority location for rail freight nor do any of the key players referred to by the Council identify it as an operational priority.

8.9.5 I also note the concerns of objectors about the need to attract a bulk user to make any scheme viable. It may well be that highway improvements would be

necessary to accommodate this, depending on the scale of the proposal. As regards this specific proposal it is not clear that the Council has taken this into account in deciding to safeguard the site.

8.9.6 I note the reservations of objectors (including the Strategic Rail Authority) about the suitability of Withington as a location for a park and ride facility. Nevertheless, the Hereford Transport Review 2003 (Document Q 13) included the Withington proposal as an option for further investigation as a rail based scheme and I consider that the proposal to safeguard land for this purpose under Policy T1 is justified on this basis. However, in my judgment, there is insufficient evidence of any rail freight scheme being implemented within the plan period to justify the safeguarding of the Whitestone Estate land under Policy T4.

RECOMMENDATION

8.9/1 Modify Policy T4 by deleting reference to Withington (Whitestone Estate).

8.9/2 Do not make any other modification in response to the objections.

8.10 PARK AND RIDE – POLICY T2 AND PARAGRAPH 8.4.5

Objections

P495/1028	Dorstone Parish Council
P635/11441	Campaign to Protect Rural England
P786/1952	Much Birch Parish Council
P830/2301	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P864/2367	Transport 2000
P898/2556	Herefordshire Green Party (Conditionally Withdrawn)
P1113/3565	Rail for Herefordshire
P1114/3588	Hereford City Cycle Forum
P356/676	Mr J V Harding
P1098/3494	G F M Dawe

Summary of Objections / Issues

- There should be a park and ride site in the Belmont area. (495)
- Whether the park and ride sites should be allocated. (635, 830)
- Whether Policy T2 has been weakened. (635)
- A permanent park and ride system should be introduced. (786)
- Policy T2 should be refined. (864)
- There should be reference to the potential adverse effect on existing bus services. (898)
- Whether there should be raised parking fees in the centre of town. (1113)
- New car parks in the centre of town should be replaced with new green spaces in the centre of town. (1113, 1098)
- Policy T2 should be reworded. (1114)

- There should be regular park and ride facilities from peripheral city car parks run by the Council. (356)
- The car park surface should be permeable. (1098)

Inspector's Reasoning and Conclusions

Park and ride at Belmont - 495

8.10.1I would expect the strategy for park and ride sites to be determined by the Local Transport Plan. In this respect, the Hereford Transport Review includes proposals for four bus-based park and ride schemes one of which would service the A465 Abergavenny Road. Further assessments are required before sites can be identified. Policy T2 is a flexible policy that would enable implementation of park and ride schemes that accord with the strategy and no modification of the Plan is necessary.

Allocation of park and ride sites – 635, 830

8.10.2It is apparent that further assessment work is needed before preferred sites can be identified. As such, I would expect forthcoming proposals to be judged against Policy T2 and other relevant provisions of the Plan.

Weakening of Policy T2 - 635

8.10.3To my mind, the Revised Deposit Draft includes important amendments. Clause 1 of Policy T2 now recognises that the city centre alone may be too limited a target area for reducing car trips. Clause 3 acknowledges the importance of considering the potential impact on existing bus services. I do not consider that the policy has been unacceptably weakened or that any modification of the Plan is necessary.

Introducing a permanent park and ride system - 756

8.10.4The provisions of the UDP will enable a permanent park and ride to be implemented. No modification of the Plan is needed.

Refinement of Policy T2 - 864

8.10.5The Hereford Transport Review (2003) has informed this policy. This review is referred to in Paragraph 8.4.5. In addition, compatibility with the Local Transport Plan would be required. In terms of informing the policy, these are the relevant documents and no modification is required. Other matters raised by the objector have been met in the Revised Deposit Draft.

Adverse effect on existing bus services - 898

8.10.6In the Revised Deposit Draft, the potential impact on existing bus services is a matter to be assessed under Policy T2. The objection has been conditionally withdrawn and no modification of the Plan is necessary.

Raised parking fees in the centre of town - 1113

8.10.7I appreciate that commuters and others will need to be encouraged to use park and ride. However, the level of fees is a management matter, not a land use consideration. No modification of the Plan in this regard would be appropriate.

Replacement green spaces in the centre of town – 1113, 1098

8.10.8I do not consider that the provision of replacement green space should be a requirement of the policy. To my mind, this would be an onerous requirement that, given the other public benefits of park and ride, would be difficult to justify. In any event, there is no evidence to indicate that the park and ride car parks will involve the development of greenfield sites or that additional greening of the city centre is necessary. Whether or not city centre car parking would be taken out of use would be part of the overall park and ride strategy and subject to the provisions of the Local Transport Plan.

Rewording of Policy T2 - 1114

8.10.9The first suggested change is to make “park and walk” and “park and cycle” the subject of the policy. In this respect, I would expect detailed schemes to make provision for onward movement by foot or by cycle. However, this is not the focus of the title and explicit reference is not necessary.

8.10.10 A second suggested change is to refer to reducing the number and length of car journeys. In this regard, the Revised Deposit Draft now requires compatibility with the Local Transport Plan. In this way, I would expect relevant transport objectives to be addressed.

8.10.11 In a third amendment, the objector suggests assessment of the potential impact on the vitality of pedestrian, cycle and bus routes. Assessment of the potential impact on bus routes is now included in the policy. As to the other matters, I would expect these to be considered in any event. However, they are unlikely to be of overriding importance such that mention in the policy would be justified.

Regular Council-run park and ride services - 356

8.10.12 It appears to me that to facilitate the implementation of a park and ride service based on peripheral city car parks is the object of the policy. The regularity of the services and by whom they are run are management matters outside the scope of the Plan although I appreciate that they will have a bearing on the success of the scheme.

Permeable car park surface - 1098

8.10.13 I appreciate that, in accordance with Paragraph 4.4.22, developers should utilise sustainable drainage techniques. However, this does not necessarily mean that park and ride car park surfaces should be permeable. It is for developers to consider how the objectives of the Plan could be met.

RECOMMENDATION

8.10/1 Do not make any modification in response to the objections.

8.11 PROTECTION AND DEVELOPMENT OF THE RAIL NETWORK - POLICY T3 AND PARAGRAPHS 8.5.1 TO 8.5.2a

Objections

P217/11287	Walford Parish Council
W323/2852	CTC Right to Ride, Ledbury (Conditionally Withdrawn)
P864/2368	Transport 2000
P865/2428	Cyclists' Touring Club
P1090/3460	Network Rail Infrastructure Ltd
P1090/3463	Network Rail Infrastructure Ltd
P1090/11143	Network Rail Infrastructure Ltd
P1090/11144	Network Rail Infrastructure Ltd
P1113/3566	Rail for Herefordshire

Summary of Objections / Issue

- Changes are needed to emphasise the positive direction of the policy. (217)
- Protection should be afforded to land needed for pedestrian and cycle access. (323)
- Good routes to access new and enhanced public transport by walking and cycling should be identified and safeguarded. (864, 865)
- Alternative uses should be considered where sites or routes are unlikely to come forward. (1090)
- Demand for local passengers on The Marches to Malvern routes should be encouraged. (1090)
- The rail industry should be the arbiter of whether a rail proposal could come forward. (1090)
- The sale or retention of land by the rail industry is not a matter for the UDP. (1090)
- Other uses should be considered where ancillary rail land is no longer required. (1090)
- The UDP should recognise the potential of redundant lines for future planning. (1113)

Inspector's Reasoning and Conclusions

Positive direction of the policy - 217

8.11.1 The objector has suggested that, in circumstances where no viable transport uses are likely to come forward, alternative non-transport use of safeguarded railway land "will" be considered. The text in the Revised Deposit Draft states that alternative uses "could" be considered. In my opinion, use of the conditional tense is appropriate. Whether alternatives would be considered would depend on the circumstances. It is not necessarily the case that alternatives will fall to be considered.

8.11.2 The objector also considers that priority attention should be given to facilitating safe and convenient access to stations for walkers and cyclists. Policy T3 uses the term "high priority". This is consistent with reference to "particular attention" in Paragraph 8.5.2a. No modification of the Plan is necessary.

Land for pedestrian and cycle access - 323

8.11.3 In the Revised Deposit Draft, Policy T3 refers to safeguarding land for ancillary uses; also to giving high priority to safe and convenient routes to stations for walkers and cyclists. The objection has been conditionally withdrawn and no modification of the Plan is necessary.

Accessing public transport by new walking and cycling routes – 864, 865

8.11.4 In large part, these objections are met by changes made to Policy T3 at the revised deposit stage. I appreciate that specific routes are not identified and safeguarded in the Plan. However, the planning of such routes would be a matter of detail. In my opinion, it is sufficient to flag up the need for safe and convenient routes, routes that would be part of the brief for the development of new facilities.

Considering alternative uses - 1090

8.11.5 It appears to me that the gist of the objection has been met by the insertion in the Revised Deposit Draft of Paragraph 8.5.2a. No modification of the Plan is necessary.

Local passengers on The Marches to Malvern routes - 1090

8.11.6 To my mind, this objection is met though the amendments to Paragraph 8.5.1 incorporated at the revised deposit stage. No modification of the Plan is necessary.

Rail industry as arbiter - 1090

8.11.7 I do not consider that it is necessary to make express reference to the involvement of the rail industry. It is inconceivable that the industry would not be involved in decisions on viable transport uses. However, to my mind, the Council should be the final arbiter on land use matters although it may, of course, be called upon to justify its decisions.

Sale and retention of land by the rail industry - 1090

8.11.8 The objector's statement indicates that land is only declared surplus to operational requirements where there is likely to be no future rail use required on the site. However, Paragraph 8.5.2a suggests that market forces may affect disposal decisions. The Plan should be modified to reflect the correct position.

Consideration of other uses on ancillary rail land - 1090

8.11.9 Paragraph 8.5.2a makes provision for the consideration of alternative non-transport uses where no viable transport uses are likely to come forward. To my mind, this provision does not need to be covered in the policy itself nor does there need to be express recognition of the role of the rail industry. No modification of the Plan is necessary.

Potential of redundant lines for future planning - 1113

8.11.10 The safeguarding of former railway land is dealt with in Paragraphs 8.5.8 to 8.5.10 and in Policy T5. Paragraph 8.5.9 indicates that the UDP seeks to

encourage and promote re-use of former railway land for transport uses, including recreational transport, whenever practical and appropriate. Policy T5 prevents development or demolition in circumstances where there is the potential for such re-use. To my mind, these provisions go a long way towards meeting the original objection.

8.11.11 However, I do not consider that it would be appropriate to bring these provisions within the ambit of Policy T3. As stated in Paragraph 5.22 of PPG 12, "... in safeguarding land local authorities will need to be realistic about the prospects for the start of the project in the plan period ...". Any schemes in respect of the redundant routes mentioned, or undertaken by "future generations", would not fall within the scope of this advice. No modification of the Plan is necessary.

RECOMMENDATIONS

8.11/1 Modify Paragraph 8.5.2a to make clear that land is declared surplus to operational requirements where there is likely to be no future rail use on the site, not in response to market conditions.

8.11/2 Do not make any other modification in response to the objections.

8.12 PROTECTION AND DEVELOPMENT OF THE RAIL NETWORK - POLICY T3 AND PARAGRAPHS 8.5.1 TO 8.5.2 - METRO AND GREAT WESTERN WAY

Objections

P830/2304 Herefordshire Friends of the Earth (Conditionally Withdrawn)
P959/2771 Hereford City Partnership Ltd

Summary of Objections / Issues

- The metro scheme is unlikely to be viable. (830)
- The extent of safeguarding either side of Great Western Way for the Metro scheme is not defined on a plan. (959)

Inspector's Reasoning and Conclusions

Hereford metro – 830, 959

8.12.1 Paragraph 8.5.3 was deleted from the Revised Deposit Draft in recognition that the Hereford Transport Review has omitted the metro from the blended package of proposals for Hereford as not representing value for money. The objections have therefore been met.

RECOMMENDATION

8.12/1 Do not make any modification in response to the objections.

8.13 RAIL FREIGHT - POLICY T4 AND PARAGRAPHS 8.5.4 TO 8.5.7

Objections

W198/11558	Hereford Civic Society
P864/2369	Transport 2000
P1090/3461	Network Rail Infrastructure Ltd

Summary of Objections / Issues

- The Roman Road East site should be reinstated. (198)
- Access to identified rail freight sites should not be impaired. (864)
- Any development at Rotherwas should have a minimal adverse impact on potential rail freight. (864)
- Objection is raised to the safeguarding of land at Pontrilas. (1090)

Inspector's Reasoning and Conclusions

Roman Road East site - 198

8.13.1 The Council indicates that the Roman Road East site has been deleted pursuant to the removal of the housing and employment allocations at Holmer. In Section 6 of my report, I have not recommended reinstatement of the employment allocation at this point in time. It follows that, in Policy T4, the Hereford (Roman Road East) site should not be reinstated.

Access to identified rail freight sites - 864

8.13.2 The need for satisfactory public or private road access to enable rail-road transfer is highlighted in Paragraph 8.5.7 of the Plan and either exists or is safeguarded at each of the sites listed. As such, I consider that the objector's related concerns are addressed.

Development at Rotherwas - 864

8.13.3 It appears to me that the land at Rotherwas necessary for rail freight is safeguarded and hence protected from adverse impact. No modification of the Plan is necessary.

Safeguarding of land at Pontrilas - 1090

8.13.4 I find that there is inadequate justification for the deletion of Pontrilas Station Yard from the provisions of Policy T4. In this respect, the Council's statement indicates that the land identified on Inset Map 17a is considered to be sufficient in size for possible parking in conjunction with the proposed re-opening of a passenger terminal as well as for freight handling.

RECOMMENDATION

8.13/1 Do not make any other modification in response to the objections.

8.14 RAIL FREIGHT - POLICY T4 – OMISSION OF LAND AT GRAFTON

Objection

P961/2776 Mr C Morgan

Summary of Objection / Issue

- Land at Grafton should be allocated for a new rail freight and passenger park and ride facility. (961)

Inspector's Reasoning and Conclusions

Land at Grafton - 961

8.14.1 The suitability of this location for a new rail-freight and park and ride facility would need to be confirmed through the Herefordshire Transport Review. Whilst a site has been identified as an option for park and ride on the A49 south, there is insufficient justification at present to make a site specific recommendation. There is no evidence to show that it would be a suitable location for a rail-freight facility.

RECOMMENDATION

8.14/1 Do not make any modification in response to the objection.

8.15 RAIL FREIGHT - POLICY T4 - MOORFIELDS / WESTFIELDS

Objection

P1102/3527 H P Bulmer Ltd

Summary of Objection / Issue

- The private siding at Moorfields serves only H P Bulmer's factory site. Its safeguarding places an unreasonable restriction on the operation of the site. (1102)

Inspector's Reasoning and Conclusions

Safeguarding of land at Moorfields – 1102

8.15.1 There are a limited number of existing rail-freight facilities in the county and I consider it is reasonable for these to be safeguarded, given a national policy stance which encourages a shift from rail to road freight where possible. Paragraph 8.5.6 provides that where it can be clearly demonstrated that no viable railfreight uses for safeguarded land are likely to come forward in the plan period, then alternative non-transport uses could be considered. To my mind, this

provides a reasonable degree of flexibility which allows operational requirements to be taken into account in determining planning applications.

RECOMMENDATION

8.15/1 Do not make any modification in response to the objection.

8.16 RAIL FREIGHT - POLICY T4 - PONTRILAS STATION YARD

Objection

P1090/5852 Network Rail Infrastructure Ltd

Summary of Objection / Issue

- The limited land available means that Pontrilas is unsuitable for this use. (1090)

Inspector's Reasoning and Conclusions

Safeguarding of land at Pontrilas. (1090)

8.16.1 I conclude at Paragraph 8.13.4 that there is inadequate justification for the deletion of Pontrilas Station Yard from the provisions of Policy T4. In this respect, the Council's statement indicates that the land identified on Inset Map 17a is considered to be sufficient in size for possible parking in conjunction with the proposed re-opening of a passenger terminal as well as for freight handling.

RECOMMENDATION

8.16/1 Do not make any modification in response to the objection.

8.17 SAFEGUARDING FORMER RAILWAY LAND - POLICY T5 AND PARAGRAPHS 8.5.8 TO 8.5.10

Objections

P635/1576	Campaign to Protect Rural England
P685/1682	Tufnell Town & Country Planning
P864/2371	Transport 2000
P1102/3528	H P Bulmer Ltd
P1108/3550	Hereford & Gloucestershire Canal Trust Ltd
P865/2429	Cyclists' Touring Club

Summary of Objections / Issues

- There should be protection against use by off-road motorised vehicles. (635)
- The policy should not apply where there are commitments to development or unless the benefits are sufficient to outweigh any shortfall created by not making the best use of land. (685)
- No use should block return to rail use. (864, 865)
- Continued access by non-car modes should not be prevented if a rail service is restored. (864, 865)
- The policy should only apply to former national operational railway land. (1102)
- A canal is a suitable use for land protected under this policy. (1108)

Inspector's Reasoning and Conclusions

Off-road motorised vehicles - 635

8.17.1 It appears to me that this is a rather detailed and peripheral matter that does not warrant mention in the policy or in the supporting text. If, in any particular scheme, use by off-road vehicles was deemed to be unacceptable, this could be precluded by condition.

Commitments to development / overriding benefits - 685

8.17.2 To my mind, the points made by the objector are addressed in an addition to Paragraph 8.5.9 made at the revised deposit stage. No modification of the Plan is necessary.

Blocking return to rail use – 864, 865

8.17.3 It does not appear to me that return to rail use would be blocked under Policy T5. The policy itself protects former railway land as potential “transport and recreational routes”; and Paragraph 8.5.9 indicates that this could include restored railways. No modification of the Plan is necessary.

Continued access by non-car modes – 864, 865

8.17.4 In the Revised Deposit Draft, reference is made to multiple uses. Attention is thereby drawn to access by non-car modes although, given the thrust of the policy, public transport projects would have priority. No modification of the Plan is necessary.

Application to former national operational railway land - 1102

8.17.5 The objective of Policy T5 is to safeguard any former railway routes that have a recognised potential for future transport, recreational or amenity use or that have existing landscape or biodiversity value. Private routes could also have potential in this regard and I see no reason why they should be excluded from the terms of the policy.

Canals - 1108

8.17.6 In the Revised Deposit Draft, Policy T5 now explicitly refers to canal development. I consider that the objection has been met and no modification of the Plan is necessary.

RECOMMENDATION

8.17/1 Do not make any modification in response to the objections.

8.18 WALKING - POLICY T6 AND PARAGRAPHS 8.6.1 TO 8.6.5

Objections

P44/220	National Farmers' Union
P217/471	Walford Parish Council
P217/11288	Walford Parish Council
W323/500152	CTC Right to Ride, Ledbury
W327/1906	Open Spaces Society
P809/2096	Hereford and Worcester Chamber of Commerce
P830/2309	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P830/2311	Herefordshire Friends of the Earth
P830/2312	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P830/500234	Herefordshire Friends of the Earth
P864/2372	Transport 2000
P1114/3592	Hereford City Cycle Forum
P1189/10350	Breinton Parish Council

Summary of Objections / Issues

- Agreement with landowners and occupiers needs to be reached. (44)
- There is an urgent need to provide missing links in otherwise continuous routes. (217)
- Amendments in Paragraph 8.6.2 would prejudice the case for shared use. (217, 323, 1189)
- There should be a new section covering the rights of way network. (327)
- The improvement of public rights of way should be encouraged. (809)
- Walking is the most sustainable form of transport. (830)
- Objection is raised to the separation of this policy from the policy on access for all. (830)
- Objection is raised to the absence of proposals for walking routes within and between settlements. (830)
- Objection is raised to the mention of shared routes with cyclists. (830, 1114)
- The discussion omits consideration of damage to walking routes caused by development. (830)
- Policy T6 should be strengthened and clarified. (864)

Inspector's Reasoning and Conclusions

Agreement with landowners and occupiers - 44

8.18.1 Where new off-road routes are being planned, I would expect the Council to agree the proposed routes with owners and occupiers. This is the procedure set down in the Council's statement. However, such consultation is essentially an administrative matter and not something that should be set down in the development plan.

Providing missing links - 217

8.18.2 I appreciate that there are parts of the county, including Walford, where there is a perceived need to provide missing links in otherwise continuous routes. However, whilst the policy is supportive of the provision of missing links, it would be unrealistic to expect all such links to be identified in the policy. The provision of missing links can be effected through rights of way or highway management without recourse to the development plan.

Shared use – 217, 323, 1189

8.18.3 Additions to Paragraph 8.6.2 in the Revised Deposit Draft qualify the possibility of shared use by referring to sufficiency of route width as well as minimum standards of layout and signing. In my opinion, these additions are unnecessary and could be unduly restrictive. The sentence already refers to shared use "in appropriate cases". In addition, there may be instances where the imperative of shared use is more important than the matters specified. I am recommending that the words be deleted.

New section on rights of way network - 327

8.18.4 The objector would wish to see a new section on public rights of way covering a range of matters including time scales for dealing with complaints, problems, repairs, commencements and completions. To my mind, these are all management matters that do not need to be addressed in the development plan.

Improvement of rights of way - 809

8.18.5 I consider that, in Policy T6, there is only minimal reference to improved routes. I am recommending an addition that would give greater encouragement to the improvement of existing public rights of way as a legitimate part of development proposals.

Walking as the most sustainable form of transport - 830

8.18.6 The amendment called for by the objector has been made in the Revised Deposit Draft. The objection has been conditionally withdrawn and no modification of the Plan is needed.

Separation from the policy on access for all - 830

8.18.7 In my opinion, and as set out in the Council's statement, the section on walking is dealing with matters different from those addressed in the section on access for all. The linkage between the topics is recognised in the text. No modification of the Plan is necessary or appropriate.

Walking routes within and between settlements - 830

8.18.8 Following revisions incorporated into the Revised Deposit Draft, this objection has been conditionally withdrawn. No modification of the Plan is necessary.

Shared routes with cyclists – 830, 1114

8.18.9 Paragraph 8.6.2 indicates that there could be shared use of walking routes “in appropriate cases”. This would include cases where sufficient route width would be available to provide safe segregation and where minimum standards of layout and signing could be met. If inappropriate for any reason, shared use would not have the support of the Plan. In the circumstances, I see no reason for there to be a presumption against shared surfaces for pedestrians and cyclists except where unavoidable.

Damage caused by development - 830

8.18.10 I appreciate that Paragraph 8.6.4 does not directly refer to damage that may be caused to walking routes by development. However, I note that Policy T6 requires development proposals to respect matters such as utility, convenience, recreational value and attractiveness. I would expect that development likely to damage a walking route would fall foul of this provision. No modification of the Plan is necessary.

Strengthening and clarifying Policy T6 - 864

8.18.11 The Council’s statement details measures that have been taken to meet this objection. I believe that the changes identified, as incorporated into the Revised Deposit Draft, meet the thrust of the objection and no modification is necessary.

RECOMMENDATIONS

8.18/1 In the fourth sentence of Paragraph 8.6.2, delete all words after “wheelchairs”.

8.18/2 In the first numbered clause of Policy T6, insert “and improved” between “new” and “links”.

8.18/3 Do not make any other modification in response to the objections.

8.19 WALKING - POLICY T6 AND PARAGRAPHS 8.6.1 TO 8.6.5 - KINGTON - OMISSION OF FOOTPATH TO PARISH BOUNDARY ON HERGEST ROAD

Objection

P535/1210

Kington Town Council

Summary of Objection / Issue

- A continuous footpath should be constructed to the parish boundary on Hergest Road. (535)

Inspector's Reasoning and Conclusions

Footpath to parish boundary – 535

8.19.1 Policy T6 generally encourages the provision of roadside footways and other forms of walking route. Whilst there may be merit in individual schemes, to identify all such schemes in the Plan would result in an over-lengthy and unnecessarily detailed document.

RECOMMENDATION

8.19/1 Do not make any modification in response to the objection.

8.20 CYCLING - POLICY T7 AND PARAGRAPHS 8.7.1 TO 8.7.4

Objections

P217/11286	Walford Parish Council
W323/2853	CTC Right to Ride, Ledbury
W323/500154	CTC Right to Ride, Ledbury
W323/500155	CTC Right to Ride, Ledbury
P830/2317	Herefordshire Friends of the Earth
P830/2323	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P864/2373	Transport 2000
P864/4272	Transport 2000
P865/2430	Cyclists' Touring Club
P865/4350	Cyclists' Touring Club
P1071/3330	English Nature (Conditionally Withdrawn)
P1108/3551	Hereford & Gloucestershire Canal Trust Ltd
P1114/3593	Hereford City Cycle Forum
P1114/3594	Hereford City Cycle Forum

Summary of Objections / Issues

- The wording negates the policy. (217)
- The policy is weaker than required. (323)
- The comment regarding allocation of road space is not supported. (323)
- Amendments in Paragraph 8.7.3 add an unnecessary constraint regarding shared use. (232)
- Objection is raised to the mention of shared use with walkers in Paragraph 8.7.3. (830, 1114)
- There need to be clearly identified cycle networks. (830, 1114)

- The provisions require strengthening and widening. (684, 685)
- The Hereford - Ross-on-Wye - Symonds Yat route is potentially in conflict with biodiversity interests. (1071)
- Great Western Way should be continued northeast to Roman Road; usage of the future canal towpath should be recognised. (1108)

Inspector's Reasoning and Conclusions

Negating the policy - 217

8.20.1 The Council acknowledges that there is a mistake in the wording of Paragraph 8.7.3. This would be corrected under Proposed Change No 11. The proposed change would meet the objection and is recommended.

Weakness of the policy - 323

8.20.2 The first change sought by the objector is to make the first part of Policy T7 more prescriptive. In this regard, "should" has been changed to "shall" in the Revised Deposit Plan. However, appropriately, the words "wherever possible" have been retained. This recognises that the incorporation of cycle routes and associated facilities will not always be possible.

8.20.3 Secondly, it is noted that "shared use" does not apply to all the routes listed. In response, the revised deposit version has been amended to indicate that it is the off-highway routes that will generally be for shared use with walkers.

8.20.4 In a third change, the objector seeks protection for newly defined routes which emerge during the period of the Plan. To my mind, this is not necessary. The final part of the policy already protects routes proposed within the plan period. However, I am proposing a form of wording that would make the situation clearer.

Allocation of road space - 323

8.20.5 I acknowledge the objector's wish to see a safe environment for cyclists. However, the policy needs to be read in conjunction with the supporting text. In this regard, Paragraph 8.7.1 recognises safety as one of the issues to be addressed in cycle route designation. The concern is addressed and no modification of the Plan is necessary.

Shared use – 323

8.20.6 Additions to Paragraph 8.7.3 in the Revised Deposit Draft qualify the possibility of shared use by referring to sufficiency of route width as well as minimum standards of layout and signing. In my opinion, these additions are unnecessary and could be unduly restrictive. The sentence already refers to shared use "in appropriate cases". In addition, there may be instances where the imperative of shared use is more important than the matters specified. I am recommending that the words be deleted.

Mention of shared use with walkers – 830, 1114

8.20.7 Paragraph 8.7.3 indicates that there could be shared use with other modes "in appropriate cases". This would include cases where sufficient route width would be available to provide safe segregation and where minimum standards of layout and signing could be met. If inappropriate for any reason, shared use would not

have the support of the Plan. In the circumstances, I see no reason for there to be a presumption against shared surfaces for pedestrians and cyclists except where unavoidable.

Clearly identified cycle networks – 830, 1114

8.20.8 The matter of cycle networks is considered in the County Cycling Strategy where a complete set of cycle routes is identified. Many routes involve use of the highway and do not need to be protected from development. Others are indicative only. The lack of specific alignment and absence of programming suggests that specific inclusion within the development plan would not be appropriate. However, those routes that are likely to be implemented within the plan period have been included in the policy although I recognise that absence of specific alignments means that depiction on the Proposals Map would be difficult.

8.20.9 In my opinion, the Council has adopted the correct approach. No modification of the Plan is necessary in this regard.

Strengthening and widening the provisions – 684, 685

8.20.10 The Council's statement details measures that have been taken to meet these objections. I believe that the changes identified, as incorporated into the Revised Deposit Draft, meet the thrust of the objections and no modification is necessary.

Hereford - Ross-on-Wye - Symonds Yat route - 1071

8.20.11 Paragraph 8.7.4a of the Revised Deposit Draft now refers to the necessity for any adverse environmental impacts to be resolved. The objection has been conditionally withdrawn and no modification of the Plan is necessary.

Continuation of Great Western Way to Roman Road / recognition of towpath use - 1108

8.20.12 Based on my reading of the Council's statement, it would appear that the works suggested by the objector could have merit. However, the scheme is not one recognised as achievable within the Plan period. As such, specific mention in the policy would not be appropriate.

8.20.13 With regard to the canal towpath, this is referred to in Paragraph 10.5.42 of the Plan. All in all, no modification of the Revised Deposit Draft is necessary.

RECOMMENDATIONS

8.20/1 Modify Paragraph 8.7.3 in accordance with Proposed Change No 11.

8.20/2 Substitute the following for the first sentence of the final paragraph of Policy T7: "Development that would prejudice the provision of any route planned for implementation in the plan period will not be permitted."

8.20/3 In the third sentence of Paragraph 8.7.3, delete all words after "wheelchairs".

8.20/4 Do not make any other modification in response to the objections.

8.21 ROAD HIERARCHY - POLICY T8 AND PARAGRAPH 8.8.1

Objections

P830/2325	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P830/500235	Herefordshire Friends of the Earth
P864/2374	Transport 2000
P865/2431	Cyclists' Touring Club
P975/11177	Persimmon Homes (South Midlands) Ltd
P977/11009	Taylor Woodrow Developments Ltd

Summary of Objections / Issues

- Statements in Paragraph 8.8.4 should be included in the policy. (830)
- Road access should not be permitted when the mode hierarchy has not been taken fully into account. (830)
- In case of conflict with the road hierarchy, vulnerable user should have priority. (864, 865)
- Whether Policy T8 should recognise that some developments will require access from the strategic highway network. (975, 977)

Inspector's Reasoning and Conclusions

Statements in Paragraph 8.8.4 - 830

8.21.1 In the Revised Deposit Draft, certain statements in Paragraph 8.8.4 have now been included in the policy as suggested by the objector. The objection has been conditionally withdrawn and no modification of the Plan is necessary.

Mode hierarchy - 830

8.21.2 The thrust of the text in question is now incorporated into the policy itself. No modification of the Plan is necessary.

Vulnerable user priority – 864, 865

8.21.3 As stated in the Council's statement, the transport user hierarchy and the road hierarchy are two separate matters. The road hierarchy is employed in the Plan as a device for controlling vehicular access points and has little to do with priority over private cars by walkers, cyclists or public transport. No modification of the Plan is necessary.

Access from the strategic highway network – 975, 977

8.21.4 The concern of Persimmon Homes relates in part to the Tanyard Lane site. In this regard, Paragraph 5.4.22 already states that vehicular access would be from the A40. The matter is also addressed in the adopted supportive development brief (Document K 13). As such, the specific interests of the developer are recognised in the Plan.

8.21.5 More generally, the policy does not preclude the creation of new access points on the strategic highway network. It indicates that they will not be encouraged and should not inhibit the strategic function of such routes. To my

mind, this emphasis is appropriate and accords with Policy T9 of RPG 11. No modification of Policy T8 or the supporting text is necessary.

RECOMMENDATION

8.21/1 Do not make any modification in response to the objections.

8.22 ROAD FREIGHT - POLICY T9 AND PARAGRAPHS 8.8.5 TO 8.8.9

Objections

P44/221	National Farmers' Union
P830/2326	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P830/2348	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P864/2375	Transport 2000
P864/2376	Transport 2000
P865/2432	Cyclists' Touring Club
P1189/3768	Breinton Parish Council
W321/945	Mrs E Newman

Summary of Objections / Issues

- Refusal should only take place where it really would not be possible to accommodate the freight movements. (44)
- Objection is raised to the omission of the findings of the Hereford Traffic Review / multi-modal study. (830, 1189)
- Policy T9 should include reference to danger and visual intrusion. (830)
- Paragraph 8.8.6 should be removed. (864, 865)
- Policy T9 is insufficiently focussed and pro-active. (864)

Inspector's Reasoning and Conclusions

Accommodating freight movements - 44

8.22.1 To my mind, the appropriate context for the consideration of freight movements is provided by the Plan and no modification is necessary. In this regard, I would expect planning permission to be refused if the proposal fell foul of the considerations identified. If freight movements could be accommodated, then there would be no related reason for refusal.

Hereford Traffic Review / multi-modal study – 830, 1189

8.22.2 Reference to the latest review has been included in Paragraph 8.3.5. No modification of the Plan is necessary.

Danger and visual intrusion - 830

8.22.3 In the Revised Deposit Draft, danger and visual intrusion are both included in Policy T9. The objection has been conditionally withdrawn and no modification of the Plan is necessary.

Removal of Paragraph 8.8.6 – 864, 865

8.22.4 In the Revised Deposit Draft, Paragraph 8.8.6 has been omitted. This part of the objections has been met and no modification of the Plan is necessary.

Whether policy T9 is sufficiently focussed and pro-active - 864

8.22.5 The first change sought is to keep freight on suitable roads and minimise vehicle mileage and trips. In this regard, it appears to me that Paragraph 8.8.9 and Policy T9, as amended in the Revised Deposit Draft, both have these objectives in mind. No modification of the Plan is necessary. In terms of innovative delivery and distribution systems, reference to more sustainable delivery systems has been added to Policy T9. Again, no further modifications are needed.

RECOMMENDATION

8.22/1 Do not make any modification in response to the objections.

8.23 A44 PEMBRIDGE BYPASS AND PARAGRAPH 8.8.17

Objection

P766/1899 Shobdon Parish Council

Summary of Objection / Issue

- The proposed bypass should be aligned to the north of Pembridge, with an access road to the industrial estate on the airfield, to avoid harm to Shobdon. (766)

Inspector's Reasoning and Conclusions

Route of Pembridge bypass – 766

8.23.1 The Pembridge bypass has featured in the county roads programme for many years but has had no route defined or funds committed. No schemes in this area of the county are sufficiently advanced to enable routes or route corridors to be identified for any village bypass scheme. The objection appears to relate to a route planning exercise expected during 2004 or 2005. It is reasonable to suppose that regard would be had to the objector's concerns in any consultation on route planning but, as no route is identified in the Plan, no modification is necessary.

RECOMMENDATION

8.23/1 Do not make any modification in response to the objection.

8.24 SAFEGUARDING OF ROAD SCHEMES - POLICY T10 AND PARAGRAPH 8.8.10

Objections

W198/1194	Hereford Civic Society (Conditionally Withdrawn)
P830/2353	Herefordshire Friends of the Earth
P830/2354	Herefordshire Friends of the Earth
P830/10982	Herefordshire Friends of the Earth
P830/11487	Herefordshire Friends of the Earth
P864/2377	Transport 2000
P1071/3333	English Nature (Conditionally Withdrawn)
P1114/3596	Hereford City Cycle Forum
P32/30	Mr G Brew
P708/2941	Ms A Downing
P1113/11137	Rail for Herefordshire
RP1417/10434	H J Hobbs and Sons
RP1421/10451	Hereford City Council

Summary of Objections / Issues

- Reference to the Hereford Outer Relief Road should be deleted. (198)
- Objection is made to safeguarding land for roads. (830, 1114)
- Objection is raised to the inclusion of the Hereford Outer Relief Road as a safeguarded scheme. (830)
- Objection is raised to Edgar Street regeneration road schemes. (830)
- Objection is raised to safeguarding schemes that have not been appraised or for which need has not been demonstrated. (830)
- Local roads are not always strong boundaries. (864)
- Assessment of the Hereford Outer Relief Road would have to be made against Policies NC1 to 4. (1071)
- Objection is raised to the link road from Rotherwas to the Grafton Inn / Rotherwas Access Road. (32, 708)
- The form of the Edgar Street / Commercial Road link will be very important. (1113)
- Demolition of business premises should be avoided under the scheme for the Edgar Street / Commercial Road link. (1417)
- Whether the effects on the existing road network of the Edgar Street / Commercial Road link would be unacceptable. (1421)

Inspector's Reasoning and Conclusions

Reference to the Hereford Outer Relief Road - 198

8.24.1 The results of the multi-modal study have now been published. Further, the Outer Relief Road scheme has been deleted from the Plan. The objection has been conditionally withdrawn and no modification of the Plan is necessary.

Safeguarding land for roads – 830, 1114

8.24.2 It appears to me that the real purpose of these objections is to resist an increase in road capacity. This purpose could be assisted if safeguarded schemes were scrapped. However, as recognised in Paragraph 5.22 of PPG 12, the safeguarding of transport routes is perfectly appropriate. Of course, individual schemes would still have to be justified on their merits. In this regard, any unnecessary increase in road capacity could be a material consideration.

Inclusion of the Hereford Outer Relief Road - 830

8.24.3 The Hereford Outer Relief Road is no longer included as such in Policy T10. To this extent, the objection has been met. The scheme has, however, been replaced in part by the Rotherwas Access Road, objections to which are considered in Section 8.25 of my report.

Edgar Street regeneration road schemes - 830

8.24.4 It appears to me that the proposals for the Edgar Street Grid are a central component of the regeneration of Hereford. The Edgar Street / Commercial Road link is an integral part of those proposals and has the support of the Grid study reports. At the same time, the details have not advanced to the stage where they could be scrutinised at the UDP inquiry.

8.24.5 Paragraph 5.21 of PPG 12 states that local plan procedures or other statutory provisions will provide the means to examine both the options in relation to the transport requirement identified and any subsequent details of the proposal's implementation. Taking into account both the stage reached and the potential importance of the link road scheme, I consider that safeguarding would be appropriate. The detailed merits of the schemes, with proper traffic appraisals, would fall to be demonstrated at the planning application stage.

Schemes that have not been appraised / need not demonstrated - 830

8.24.6 Guidance on the safeguarding of transport routes is set out in Paragraphs 5.22 and 5.23 of PPG 12. I have no reason to suppose that the schemes identified in Policy T10 do not comply with this advice. I appreciate that, as in the case of the Edgar Street / Commercial Road link, further appraisal work may be necessary. However, schemes will still be subject to planning permission. Consideration can be given to outstanding details at this stage.

Local roads are not always strong boundaries - 864

8.24.7 I appreciate that local road will not always provide strong boundaries. However, the Council states that none of the schemes listed are routed or designed to contain development pressures. I do not consider that any modification of the Plan is necessary.

Assessment of the Hereford Outer Relief Road against Policies NC1 to 4 - 1071

8.24.8 The Hereford Outer Relief Road is no longer listed under Policy T10. The objection has been conditionally withdrawn and no modification of the Plan is necessary.

Link road from Rotherwas to the Grafton Inn / Rotherwas Access Road - 32

8.24.9 These objections were lodged at the first deposit stage and relate to the scheme identified as the Hereford Outer Relief Road. The scheme of this description has now been dropped and no related modification of the Plan is necessary. Objections to the Rotherwas Access Road are considered in Section 8.25 below.

Form of the Edgar Street / Commercial Road link - 1113

8.24.10 I appreciate that the form of the Edgar Street / Commercial Road link will be important. By way of potential reassurance, the Council's statement indicates how severance would be avoided and other matters addressed. There is nothing in the objection that suggests to me that Policy T10 needs to be modified. However, legitimate concerns will need to be addressed as the scheme is progressed.

Demolition of business premises – Edgar Street / Commercial Road link - 1471

8.24.11 The details of the Edgar Street / Commercial Road link would need to be justified at the planning application stage. In this regard, I would expect any unnecessary demolition of property to be avoided. However, as noted above, I perceive the scheme to be an important project and one that should be safeguarded under the provisions of Policy T10.

Effects of the Edgar Street / Commercial Road link on existing road network - 1421

8.24.12 It appears to me that the objector's concerns centre on the consultation process. This is an administrative matter outside the scope of the development plan. With regard to the traffic effects, I have no reason to suppose that the link road would have a detrimental effect on the existing road network. There is inadequate justification for the deletion of the scheme from Policy T10. I note, however, that further work is needed. An addition to replacement Paragraph 8.8.16 to this effect would be appropriate.

RECOMMENDATIONS

8.24/1 At the end of replacement Paragraph 8.8.16, add the words: "Further work will be necessary before a detailed submission can be made."

8.24/2 Do not make any other modification in response to the objections.

8.25 SAFEGUARDING OF ROAD SCHEMES - POLICY T10 AND PARAGRAPHS 8.8.11 TO 8.8.12 (DEPOSIT DRAFT: OUTER RELIEF ROAD; AND REVISED DEPOSIT DRAFT: ROTHERWAS ACCESS ROAD)

Objections

P194/420	Callow and Haywood Group Parish Council
W198/11396	Hereford Civic Society
P371/790	Ross-on-Wye and District Civic Society
P415/7224	Crest Strategic Projects Ltd
P415/11298	Crest Strategic Projects Ltd
P415/11299	Crest Strategic Projects Ltd
P602/1335	Herefordshire Nature Trust
P635/11442	Campaign to Protect Rural England
P635/11672	Campaign to Protect Rural England
P755/11502	The Highways Agency
P786/1950	Much Birch Parish Council
P830/2324	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P830/2346	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P830/2349	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P830/500236	Herefordshire Friends of the Earth
P864/4290	Transport 2000
P864/4291	Transport 2000
P864/7654	Transport 2000
P890/2526	Government Office for the West Midlands
P959/2770	Hereford City Partnership Ltd
P1017/3133	Lower Bullingham Parish Council
P1063/3227	Executors of the late K Goodwin and his Estate
P1071/3332	English Nature (Conditionally Withdrawn)
P1113/3570	Rail for Herefordshire
P1113/3571	Rail for Herefordshire
W10/834	Mr J and Ms M Byard
P171/371	Mrs A D Brian
P237/1014	Mr D West
P356/673	Mr J V Harding
P466/961	Ms M Storey
W578/1274	Mr Jonathan Hines
W578/11091	Mr Jonathan Hines
P775/1933	Mr and Mrs J Bone
P1098/3489	G F M Dawe
P1098/10576	G F M Dawe
P1156/3677	Mr J B Nash
P1156/3678	Mr J B Nash
RP1508/11231	Mr R D C Smith

Summary of Objections / Issues

- Whether there should be a commitment to a complete bypass of Hereford. (198, 237, 786, 1017)
- Whether the Outer Relief Road as described in the Deposit Draft UDP should be safeguarded. (171, 356, 371, 415, 578, 602, 830, 864, 1071, 1156)

- Whether an extended Outer Relief Road should be safeguarded. (10, 775, 959)
- Whether the Rotherwas Access Road should be safeguarded and on the alignment shown. (194, 415, 466, 578, 635, 755, 830, 864, 1063, 1098, 1113, 1156, 1508)
- Whether the A49 Ross Road to A465 Abergavenny Road should be safeguarded. (415, 635, 890, 1098)

Inspector's Reasoning and Conclusions

Commitment to a complete bypass of Hereford – 198, 237, 786, 1017

8.25.1I appreciate that there have been discussions regarding a bypass for Hereford for many years. Certain objectors see a complete bypass as being central to the economic prosperity of the city and to the relief of congestion. Some still hanker after an eastern bypass. Others feel that a western bypass is the only realistic solution.

8.25.2Be that as it may, the section of the Plan to which the related objections refer is concerned with safeguarding road schemes. As stated in Paragraph 8.8.10 of the Revised Deposit Draft, the role of the UDP is to safeguard land for road proposals which are to be implemented within the Plan period. This is confirmed in PPG 12. In respect of a complete bypass of Hereford, there is no prospect of a scheme being implemented in the Plan period. Indeed, no clear alignment has been identified or approved for such a route nor is there any funding.

8.25.3Paragraph 8.8.12 of the Plan confirms that the proposals arising from the Hereford Transport Review include, as part of a combined package, an Outer Distributor road for Hereford. To my mind, this is an appropriate reference to future prospect of a bypass for Hereford. However, any form of safeguarding would not be appropriate.

Safeguarding the Outer Relief Road - 171, 356, 371, 415, 578, 602, 830, 864, 1071, 1156

8.25.4Under the Deposit Draft Plan, the intention was to safeguard an Outer Relief Road that would essentially run south of Hereford from the A465 Abergavenny Road in the west to the A438 Ledbury Road in the east. In the Revised Deposit Draft, there is no longer a scheme of this description. The eastern part of the route has been dropped altogether. The western part of the route is now described as the A49 Ross Road to A465 Abergavenny Road. The southern part of the route is described as the A49 Ross Road to B4399 Holme Lacy Road (Rotherwas Access Road).

8.25.5In that the Outer Relief Road as conceived at the deposit draft stage has now been dropped, it follows that related objections have been overtaken by events. Insofar as the objections relate to the A49 Ross Road to A465 Abergavenny Road or the A49 Ross Road to B4399 Holme Lacy Road (Rotherwas Access Road) sections of the route, I have considered them below under the appropriate headings.

Safeguarding an extended Outer Relief Road – 10, 775, 959

8.25.6 Some objectors, seeing that the Outer Relief Road would have bypassed much of eastern Hereford, would wish to see that road extended through to the A4103 or even the A49 north. However, the proposals for an Outer Relief Road have been dropped. In addition, there is no route alignment, funding or programming such that an extended scheme could be safeguarded and commenced within the plan period. In addition, I note that an eastern bypass of Hereford has, in the past, been roundly rejected on environmental grounds. In short, safeguarding of an extended Outer Relief Road scheme would be totally inappropriate.

Whether the Rotherwas Access Road should be safeguarded and on the alignment shown - 194, 415, 466, 578, 635, 755, 830, 864, 1063, 1098, 1113, 1156, 1508

8.25.7 Preparations for the Rotherwas Access Road are at a reasonably advanced stage. It is a top priority scheme for implementation during the current Local Transport Plan five year programme. Although this programme has slipped, the scheme is being carried forward into the Local Transport Plan for the second half of the decade (Document Q 19). Here it is confirmed that planning permission was secured in 2003 and compulsory purchase orders were completed in 2004. Subject to funding, completion of the scheme in 2007/8 is envisaged.

8.25.8 The Council has identified a substantial amount of funding towards the scheme. In addition, a bid for major scheme funding is to accompany the latest Local Transport Plan. As a fallback, the Council has the promise of funding by the prospective developers of housing at Bullinghope although this is dependent upon confirmation of the allocation shown in the Revised Deposit Draft.

8.25.9 Given the above, I am satisfied that the circumstances surrounding the Rotherwas Access Road are such that road proposal satisfies Government guidance on the safeguarding of transport routes, for example, as is set out in Paragraph 5.22 of PPG 12.

8.25.10 Objections have been raised on a wide variety of grounds. Some say that the scheme is contradictory to the aims of the Plan and unacceptable for environmental or other reasons. Others are concerned at the way housing development would creep towards the boundary formed by the road. The proposed alignment has also been criticised. In other objections, the actions of the Council have been questioned in regard to decision taking, conflicting roles and misuse of obligations. In terms of the supporting text, the Highways Agency would wish to stress need for compliance with the agency's policy and standards.

8.25.11 To a large extent, this is all water under the bridge. Detailed planning permission has now been granted. In considering the planning application, matters such as need, alternative options and alignments as well as environmental consequences were taken into account. The matter of housing development and related obligations is considered separately in Section 5 of my report. As to the actions of the Council, I have no reason to suppose that decisions have not been reached in a proper way. In any event, it would be open to objectors to challenge in the courts any questionable decision.

8.25.12 In all the circumstances, I support the safeguarding of the scheme together with the description in Paragraph 8.8.11. I note, however, that the alignment that has been granted planning permission is slightly different from that

shown on the Proposals Map. This would be addressed through Proposed Change No 23 which is hereby recommended.

Whether the A49 Ross Road to A465 Abergavenny Road should be safeguarded - 415, 635, 890, 1098

8.25.13 To my mind, the A49 Ross Road to A465 Abergavenny Road is a slightly different kettle of fish. It is not a scheme that is included in the current Local Transport Plan; and even in the draft Local Transport Plan for 2006/7 – 2010/11, implementation of the scheme is not envisaged until the period 2011/12 to 2015/16, after the Plan period (Document Q 19, Section 4.4.8). In addition, there is no funding in place.

8.25.14 In a strategic context, I appreciate that this link is seen as an important “stepping stone” in the completion of an outer distributor road. However, it appears to me that there is no overall strategy in this regard. Decisions that could affect the sense of the A49 to A465 link, and perhaps its alignment, have yet to be taken.

8.25.15 As to the alignment shown on the Proposals Map, this appears to be an historic route that would be out of kilter with recent decisions. For example, the eastern terminus of the link would not marry up with the proposed western terminus of the Rotherwas Access Road. In this regard, the possible need to vary the safeguarded route or to define an area of search was recognised at the inquiry. However, to my mind, a more fundamental point is that the scheme is not at a stage where safeguarding would be appropriate. The proposed safeguarding would not accord with related advice in PPG 12. I recommend that the scheme should be omitted from the Plan.

RECOMMENDATIONS

8.25/1 Modify Inset Map HER1 in accordance with Proposed Change No 23 and Map PC3.

8.25/2 Delete the A49 Ross Road to A465 Abergavenny Road scheme from Policy T10. Replace Paragraph 8.8.12 with a statement about the Council's aspirations in respect of an outer distributor road for Hereford.

8.25/3 Do not make any other modification in response to the objections.

8.26 SAFEGUARDING OF ROAD SCHEMES - POLICY T10 AND PARAGRAPH 8.8.15 - ROMAN ROAD (EASTERN SECTION)

Objection

P415/874 Crest Strategic Projects Ltd

Summary of Objection / Issue

- No technical or other justification for the proposed improvements are provided in Paragraph 8.8.15. The proposal should be deleted. (415)

Inspector's Reasoning and Conclusions

Roman Road (Eastern Section) - 415

8.26.1 In the Deposit Draft Plan, the requirement to undertake further improvements east of Munstone Road, including a new railway bridge, was related to a proposal to develop land for employment and housing purposes with access onto Roman Road. However, these proposals were dropped from the Revised Deposit.

8.26.2 Be that as it may, I am recommending in Section 5 of my report that the housing allocation at Holmer should be reinstated. In the light of this recommendation, I consider that further improvements to the eastern section of Roman Road would be justified.

8.26.3 Any requirement for developer contributions would need to be negotiated at the time of an application for planning permission through a planning obligation. An obligation would need to be fairly and reasonably related to the development proposed. Contributions to road improvements have been sought in respect of other development proposals in the vicinity and I consider that the reference should be retained in Paragraph 8.8.15. However, mention should be made of development proposals in the vicinity.

RECOMMENDATIONS

8.26/1 Modify Paragraph 8.8.15 of the Revised Deposit by inserting reference to development proposals with access onto Roman Road.

8.26/2 Do not make any other modification in response to the objection.

8.27 SAFEGUARDING OF ROAD SCHEMES - POLICY T10 AND PARAGRAPHS 8.8.13 TO 8.8.14 - ROMAN ROAD (TILLINGTON ROAD – STRETTON SUGWAS)

Objections

W198/11620	Hereford Civic Society (Conditionally Withdrawn)
P830/4495	Herefordshire Friends of the Earth
P1113/3572	Rail for Herefordshire
P1189/3767	Breinton Parish Council
P1098/3490	G F M Dawe

Summary of Objections / Issues

- This section of the road should be designed and built as soon as possible. (198)
- Sustainable modes of transport should be considered in connection with the safeguarding of routes. (830, 1189)
- Details shown on the Proposals Map are unclear. The roundabout should be redesigned so as not to encroach on the old railway line. (830, 1113)

- Objection is raised to any link road until Swainshill is properly defined in the UDP. (1189)
- The proposed design encourages speed rather than safety for vulnerable road users. (1098)
- The design should be more in keeping with the historic road and surrounding landscape. (1098)

Inspector's Reasoning and Conclusions

All objections

8.27.1 To some extent these objections have been overtaken by events. At the time of writing, the improvement of the section between Tillington Road and the A480 is nearing completion. Accordingly, Paragraph 8.8.13 should be deleted from the Plan.

8.27.2 With regard to a link from the A480 to the A438, a change has been made to Paragraph 8.8.14 in the Revised Deposit Draft which now refers to consultations with the local community. A further amendment is set out in Proposed Change No 12 which states that "Consideration will be given to such an extension being designed and built as soon as possible, subject to funding becoming available."

8.27.3 I consider that these changes satisfy most of the objections. There will still be a need for consultation on the route and final design of any link between the A480 and A438 which will take account of environmental, amenity and safety issues. I support Proposed Change No 12, but no further modification is needed in response to these objections.

RECOMMENDATIONS

- 8.27/1 Delete Paragraph 8.8.13
- 8.27/2 Modify Paragraph 8.8.14 in accordance with Proposed Change No 12.
- 8.27/3 Do not make any other modification in response to the objections.

8.28 SAFEGUARDING OF ROAD SCHEMES - POLICY T10 AND PARAGRAPH 8.8.16 - EDGAR STREET / COMMERCIAL ROAD LINK, HEREFORD

Objections

W198/11619	Hereford Civic Society
RW1280/500163	Wm Morrison Supermarkets plc
RP1361/10310	Mr N Jones
P830/500237	Herefordshire Friends of the Earth

Summary of Objections / Issues

- The proposed link road could cause more traffic problems than those it is designed to solve. The link from Commercial Road to Ledbury Road should be reinstated. (198)
- The route should be shown as "indicative only". (1280)
- A proper relief road is required which has adequate capacity for at least the next 20 years. (1361)
- The traffic and other impacts of the proposed link have not been rigorously scrutinised. (830)

Inspector's Reasoning and Conclusions

Capacity of the link road – 198, 1361

8.28.1 It appears to me that the proposals for the Edgar Street Grid are a central component of the regeneration of Hereford. The Edgar Street / Commercial Road link is an integral part of those proposals and has the support of the Grid study reports. At the same time, the details have not advanced to the stage where they could be scrutinised at the UDP inquiry.

8.28.2 Paragraph 5.21 of PPG 12 states that local plan procedures or other statutory provisions will provide the means to examine both the options in relation to the transport requirement identified and any subsequent details of the proposal's implementation. Taking into account both the stage reached and the potential importance of the link road scheme, I consider that safeguarding would be appropriate. The detailed merits of the schemes, with proper traffic appraisals, would fall to be demonstrated at the planning application stage.

8.28.3 The objectors consider that the proposals may not provide sufficient capacity to relieve congestion. Road and transport proposals in Hereford City will continue to be the focus of scrutiny; and capacity in the road network will be an important consideration. However, proposals to increase capacity have to be judged against many criteria, including their environmental effects and implications for sustainability.

8.28.4 Paragraph 8.8.23 makes it clear that there is no realistic prospect of a link between Commercial Road and Ledbury Road coming forward in the plan period given its complex alignment, need to cross the railway and limited opportunities to secure developer funding. It is not included in the Local Transport Plan and I consider there is no justification for including it in the UDP.

Whether the link road should be "indicative only" – 1280

8.28.5 I have concluded above that safeguarding is appropriate. Whilst further consultation will be needed on the detailed design, I do not consider it is necessary to refer to the proposal as indicative only.

Schemes that have not been appraised / need not demonstrated - 830

8.28.6 Guidance on the safeguarding of transport routes is set out in Paragraphs 5.22 and 5.23 of PPG 12. I have no reason to suppose that the schemes identified in Policy T10 do not comply with this advice. I appreciate that, as in the case of

the Edgar Street / Commercial Road link, further appraisal work may be necessary. However, schemes will still be subject to planning permission. Consideration can be given to outstanding details at this stage.

RECOMMENDATION

8.28/1 Do not make any modification in response to the objections.

8.29 SAFEGUARDING OF ROAD SCHEMES - POLICY T10 AND PARAGRAPH 8.8.20 - LEDBURY BYPASS EXTENSION

Objections

P618/1375 Mr B Clutterbuck
P1098/3491 G F M Dawe

Summary of Objections / Issues

- Whether the Ledbury bypass extension should be safeguarded. (618)
- Whether the safeguarded alignment is appropriate. (1098)

Inspector's Reasoning and Conclusions

Safeguarding of Ledbury bypass extension - 618

8.29.1The objector is concerned that the Ledbury bypass extension would fail to protect, safeguard or enhance the neighbouring environments. In particular, there would be an increase in heavy goods vehicle traffic on the B4214 and B4220. For my part I would acknowledge that, with the bypass extension in place, some heavy goods traffic would transfer to a route through Ledbury. However, I would not expect that the numbers involved and the related effect on roads and villages would be significant.

8.29.2A further concern is whether the scheme would be built. In this respect, I am aware that there are uncertainties regarding funding. However, the Council is confident that developer funding could be found. Discussions are proceeding in this regard. All in all I find that safeguarding of the scheme would be appropriate.

Proposed alignment - 1098

8.29.3The road would be seen in the context of the industrial estate and would define its western boundary. Bearing in mind also the opportunities for mitigation, I do not consider that the chosen alignment is unacceptable or that the safeguarding of the route should be dropped.

RECOMMENDATION

8.29/1 Do not make any modification in response to the objections.

8.30 BROMYARD INDUSTRIAL RELIEF ROAD - PARAGRAPH 8.8.25

Objections

P520/6387 Bromyard and Winslow Town Council
P1016/3115 Bromyard & District Chamber of Commerce and Industry

Summary of Objections / Issue

- Whether the Bromyard Industrial Relief Road should be reinstated. (520, 1016)

Inspector's Reasoning and Conclusions

Reinstatement of the Bromyard Industrial Relief Road – 520, 1016

8.30.1 In the current Local Transport Plan, the Bromyard Industrial Relief Road is envisaged as a developer funded scheme that would provide improved access to industrial land earmarked for expansion. In this regard, I recognise that there would be other benefits as well. Existing industry would benefit; and there would be environmental and safety benefits in Bromyard town centre.

8.30.2 However, with the removal of the employment allocation, it appears to me that the main reason for the scheme has been removed. The likelihood of developer funding of any significant scale is remote. Similarly, funding from bodies such as Advantage West Midlands or from European Community sources is unlikely to be available. As such, the scheme has been dropped from the unitary development plan.

8.30.3 I appreciate that the Bromyard Industrial Relief Road is a scheme safeguarded in the adopted Malvern Hills District Local Plan. It is also a scheme that is referred to in the current Local Transport Plan that runs to 2005/06. However, it does not feature in the emerging Local Transport Plan (Document Q 19). Notwithstanding some benefits, I do not consider that this is a scheme that is likely to be implemented during the period of the Plan. Its inclusion would not accord with Government guidance, for example, in Paragraph 5.22 of PPG 12. No modification of the Plan is necessary.

RECOMMENDATION

8.30/1 Do not modify the Plan in response to the objections.

8.31 SAFEGUARDING OF ROAD SCHEMES - POLICY T10 - ADDITIONAL SCHEME - BROMYARD NORTHWEST BYPASS

Objection

P520/1073 Bromyard and Winslow Town Council

Summary of Objections / Issue

- Ideally, the Plan would promote the construction of a new stretch of the A44, taking it to the north of Bromyard. (520)

Inspector's Reasoning and Conclusions

Bromyard northwest bypass - 520

8.31.1 The proposal for a bypass to the northwest of Bromyard would be a major new road scheme. It has not been included in the adopted Structure and Local Plans and does not feature in the Local Transport Plan.

8.31.2 Existing usage of the A44 (some 7,144 vehicles per day) indicates that there are unlikely to be substantial economic or environmental benefits from the scheme. The scale of development proposed for Bromyard is not sufficient to attract developer funding on the necessary scale. Road building on this scale would require evaluation before being included in any programme. I consider that there is insufficient justification for the scheme to support any modification of the Plan.

RECOMMENDATION

8.31/1 Do not make any modification in response to the objection.

8.32 SAFEGUARDING OF ROAD SCHEMES - POLICY T10 - ADDITIONAL SCHEME - PEMBRIDGE / EARDISLEY / LYONSHALL BYPASS)

Objections

P780/1940	Rev J Pollock
P498/1031	Eardisley Women's Institute
P98/291	Mrs J E Pidduck
P99/292	Mr P E King
P102/295	Mrs G Henesey
P146/343	Mr and Mrs C R P Davies
P147/344	Dr D M Spencer
P183/402	Ms S King
P185/405	Mr R Wood
P502/1035	Mr and Mrs A Hammerton
P967/2786	A J Hammond
P1031/3150	Mrs C S Mackay
P968/2788	Dr C J Mackay
P103/298	Eardisley Group Parish Council
P100/293	Mrs D M Cocker
P182/400	E Hatcher
P184/403	Mr A Davis
P186/404	Mr R M Green
P242/509	Dr G Worrall
P252/524	A J and J E Franklin

P254/529	Mrs M A Fitness
W308/4161	Mrs M Mason
P406/842	Mr John Hawes
P500/1033	Mr and Mrs S Harris
P894/2522	C and M Bysouth
P896/2531	D and A Killick
P407/1256	Mr B M Johnson
W308/590	Mrs M Mason
P896/2530	D and A Killick

Summary of Objections / Issue

- Whether the villages of Pembridge, Lyonshall and Eardisley should be bypassed. (All objectors)

Inspector's Reasoning and Conclusions

Bypassing Pembridge, Lyonshall and Eardisley – all objectors

8.32.1 In one way or another, all the objections touch on the question of whether traffic, notably heavy goods traffic, should be taken out of the villages of Pembridge, Lyonshall or Eardisley through a scheme that ought to be safeguarded in the Unitary Development Plan.

8.32.2 Some of the objectors have an interest in one village and favour a particular scheme, for example, a bypass for Eardisley possibly combined with traffic management measures in the village or the upgrading of roads such as the A480. Others see a bypass for Lyonshall as a preferred and cheaper overall solution with or without traffic management and local upgrading. Yet others would wish to see a relief road or bypass for all three villages or measures to take lorries out of one or more of the settlements.

8.32.3 It appears to me that the Council is aware of the problems faced by these villages and is taking steps to address such matters. In the first instance, the Council has been undertaking a study of northwest Herefordshire with a view to gaining a better understanding of the movement of heavy goods vehicles through this part of the county. The final results of the study were not available at the inquiry. However, the Council was in a position to flag up a number of likely key proposals. These include a freight quality partnership; traffic management measures; and on-going monitoring such that longer term options could be kept under review.

8.32.4 I would expect that, through the sort of measures envisaged by the Council, much could be done to reduce the impact of traffic on village communities and on the local environment. Freight quality partnerships could lead to routing agreements and local road improvements; and traffic management could embrace a variety of measures including widening of footways, the introduction of speed limits, sensitive traffic calming and improved signing to industrial estates. The longer term option of a bypass would not be ruled out.

8.32.5 In my opinion, the sorts of measures envisaged by the Council represent the preferred short term solution and should be favoured ahead of any bypass scheme. In any event, there is no identified bypass route or route corridor, no bypass funding and no likelihood of a bypass scheme being implemented during the period

of the Plan. As such, the basic requirements for the safeguarding of a scheme would not be met. No modification of the Plan is appropriate.

RECOMMENDATION

8.32/1 Do not make any modification in response to the objections.

8.33 SAFEGUARDING OF ROAD SCHEMES - POLICY T10 - ADDITIONAL SCHEME - LEOMINSTER SOUTHERN RELIEF ROAD

Objection

P677/3187 Brasenose College

Summary of Objection / Issue

- A route or zone of interest should be safeguarded under Policy T10. (677)

Inspector's Reasoning and Conclusions

Leominster Southern Relief Road – 677

8.33.1I have concluded below (Paragraph 8.35.5) that it would be wrong, unnecessary and premature to indicate that land southwest of Leominster is most suited to longer term growth with a related bypass. I recommend that Paragraph 8.8.21 should be deleted from the plan. It follows that it would be inappropriate to attempt to safeguard a route or zone of interest under Policy T10 or on the Proposals Map.

RECOMMENDATION

8.33/1 Do not make any modification in response to the objection.

8.34 SAFEGUARDING OF ROAD SCHEMES - POLICY T10 - ADDITIONAL SCHEME - LITTLE DEWCHURCH

Objection

P590/1276 Little Dewchurch Parish Council

Summary of Objection / Issue

- The promised road improvements at the junction by the village hall should be expedited and work carried out at St David's Rise. (590)

Inspector's Reasoning and Conclusions

Road improvements at Little Dewchurch – 590

8.34.1 I consider that local junction improvements such as these are a matter for highways management rather than planning policy. No modification of the Plan is necessary.

RECOMMENDATION

8.34/1 Do not make any modification in response to the objection.

8.35 LEOMINSTER ZONE OF INTEREST - PARAGRAPH 8.8.21

Objections

P635/4083	Campaign to Protect Rural England
P677/3188	Brasenose College
P864/2379	Transport 2000
W287/848	Mr A Greene
W287/856	Mr A Greene
P482/994	Mr M Bufton
P599/1290	G Greene
P829/2140	Ms M Fothergill
P879/3798	Ms P Greene
P1003/3036	Mr and Mrs A Greene
P1164/3690	Mr A Ramsden
P1188/3765	W S Layton
P1199/4459	Ms P O'Keefe

Summary of Objections / Issue

- Whether there should be continued reference to the Leominster Zone of Interest and, if so, whether the scheme should be identified on the Proposals Map. (All objectors)

Inspector's Reasoning and Conclusions

Reference to the Leominster Zone of Interest – all objectors

8.35.1 It appears to me that the reference to the Leominster Zone of Interest in Paragraph 8.8.21 of the Plan raises a number of problems. First of all, the reference appears to be for information only. There is no related policy. The paragraph itself has no "teeth" and concludes simply by saying that land that could be subject to this route is referred to as a zone of interest for the benefit of future development investigations beyond the timescale of the Plan to assist longer term planning. There is no suggestion, for example, that development that could compromise implementation of the envisaged bypass would be refused.

8.35.2 Secondly, the extent of the zone of interest is not identified in the Plan. There is only reference to a new road from the B4361 Hereford Road to the A44 southwest of Barons Cross.

8.35.3 Thirdly, and more particularly, the references to the road and to the related future direction of housing growth beg a number of questions none of which are appropriate for detailed consideration at this stage. These include such questions as whether there is a need for expansion on the edge of Leominster post 2011 and, if so, by how much; whether the land to the southwest of Leominster is the only area where growth could be accommodated; and whether a bypass such as that envisaged would be necessary in order to enable the development?

8.35.4 Objectors to the Plan have questioned the need for a bypass. They have also pointed to environmental damage that would be caused by such a scheme. Further, the necessity to locate further development southwest of Leominster has been queried. From the information before me, I have not been able to weigh the relevant factors and reach a conclusion on these issues. Be that as it may, there is no necessity to conclude on such matters at this stage. To do so would be premature. Reference in the Plan in advance of informed debate would also be premature.

8.35.5 It may well be that future studies, and public debate, confirm the need for a bypass and for future housing development to be located southwest of Leominster. However, I do not consider that such a conclusion can be reached at this stage. It would be wrong, unnecessary and premature to indicate that land southwest of the town is most suited to longer term growth with a related bypass. It follows that it would be inappropriate to attempt to identify a zone of interest on the Proposals Map.

RECOMMENDATIONS

- 8.35/1 Delete Paragraph 8.8.21 from the Plan.
8.35/2 Do not make any other modification in response to the objections.

8.36 PARKING PROVISION - POLICY T11 AND PARAGRAPHS 8.9.1 TO 8.9.4

Objections

W198/1196	Hereford Civic Society
W323/2855	CTC Right to Ride, Ledbury
P520/6451	Bromyard and Winslow Town Council
P736/1787	Moreton on Lugg Parish Council
P786/1953	Much Birch Parish Council
P830/2389	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P830/2391	Herefordshire Friends of the Earth
P864/2380	Transport 2000
P865/2433	Cyclists' Touring Club
P890/2523	Government Office for the West Midlands
P956/2793	Mercia Healthcare Limited

P959/2773	Hereford City Partnership Ltd
P977/2923	Taylor Woodrow Developments Ltd (Conditionally Withdrawn)
P1016/3116	Bromyard and District Chamber of Commerce and Industry
P1185/3757	Tesco Stores Ltd (Conditionally Withdrawn)
RW1280/500161	Wm Morrison Supermarkets plc
W321/946	Mrs E Newman
P367/785	Mr A Highfield

Summary of Objections / Issues

- There should be reference to a satisfactory public transport service connecting the rural areas of the county to Hereford. (198)
- Cycle parking should be addressed. (323, 864, 865)
- Whether additional provision should be made within the UDP for car parking in Bromyard. (520, 1016)
- New car parking areas in Hereford should be identified. (736)
- The car parking standards should be revised as envisaged in Paragraph 8.9.4 and to reflect PPG 13. (830, 890, 977, 1185, 1280)
- There should be a policy on residents' and on-street parking provision including the reallocation of road space according to the user hierarchy; also on workplace parking charges (830)
- There should be a policy encouraging car-free development. (830)
- Whether parking provision should "generally" be restricted as a maximum. (864, 865)
- Whether the hospital parking standards are appropriate. (956)
- Car parking immediately south of the river in Hereford should be encouraged. (959)
- Whether there should be extra car parking in Kington. (321)
- Whether parking associated with County Hall would give rise to unacceptable problems. (367)

Inspector's Reasoning and Conclusions

Satisfactory public transport service - 198

8.36.1 The objector is concerned about restrictions on car parking in circumstances where there is an unsatisfactory public transport system serving rural areas. However, I do not consider that, within Policy T11, insufficient attention is being given to the problem. The availability of alternative modes of transport would be taken into account in considering parking provision. For example, if there was no bus service, I would expect that greater emphasis could be given to use of the car and car parking provision. It is not necessary to qualify the policy as suggested by the objector.

Cycle parking – 323, 864, 865

8.36.2I note that, in the Revised Deposit Draft, changes to Paragraph 8.9.1 have been introduced. It is now clear that parking schemes need to make provision for cycles as well as motor vehicles.

8.36.3The main provisions in respect of cycle parking are, however, to be found in Section 8.7 of the Plan. Policy T7 refers to the provision of secure cycle parking. Paragraph 8.7.5 is also relevant. In this regard, it would be better to use the term “convenient, safe and secure cycle parking” as in Paragraph 51 of PPG 13. Further, the reference in Paragraph 8.7.5 should be corrected so that it refers to parking standards in supplementary planning guidance, not in Appendix A.

Car parking in Bromyard – 520, 1016

8.36.4At the inquiry, it was acknowledged on behalf of the Council that additional parking is necessary in Bromyard. This is confirmed in Paragraph 8.8.11 of the emerging Local Transport Plan (Document Q 19) which states, “Redevelopment of land previously used for off-street car parking over recent years has indicated a need to provide additional off-street car parking spaces to meet the current demand. The Council will investigate opportunities to provide additional car parking to support the local economy.”

8.36.5There is, however, no agreement on how to proceed. Amongst other things, the objectors want potential parking areas to be looked at and allocated under the Unitary Development Plan. The Council envisages proceeding through the mechanism of the Local Transport Plan.

8.36.6For my part, I applaud the initiative taken by Bromyard and Winslow Town Council in trying to identify suitable sites. However, I feel that this is a matter that should be taken forward through the Local Transport Plan. In this way, matters can be reviewed in a comprehensive way. Opportunities for new car parks, including a replacement for the Tanyard car park, can be considered alongside appropriate measures in respect of on-street parking, charging regimes, disc schemes and the like.

8.36.7Further, I do not have an adequate overview of matters relevant to the allocation of the sites put forward. In addition to the absence of a policy context for car parking in Bromyard, I have little or no information on the intentions of the owners, availability, optimum use and so on. All in all, I consider that additional parking provision in Bromyard should be pursued as envisaged in the Local Transport Plan. In this regard, the UDP is flexible enough to respond to opportunities that may come forward.

New car parking areas in Hereford - 736

8.36.8I have no details of “the lack of adequate car parking within Hereford City”. Be that as it may, I would expect major new developments to make appropriate provision in accordance with the Council’s standards. However, in order to promote the use of non-car modes, additional public parking in more central areas would not generally be encouraged.

8.36.9Particular mention has been made of proposed development at the ex-SAS camp. In this regard, Government guidance seeks to avoid the profligate use of land. In addition, parking policies should be framed with good design in mind and in recognition of the fact that car ownership varies with income, age, household

type, type of housing and location. Standards should not be set as a minimum but as a maximum. I have no reason to suppose that this guidance has not been taken into account in residential developments such as Bradbury Estate. All in all, no modification of the Plan is necessary.

Revised car parking standards – 830, 890, 977, 1185, 1280

8.36.10 Through changes introduced in the Revised Deposit Draft, the Plan will no longer rely on the out of date standards in Appendix B. Revised standards will be included in supplementary planning guidance. This is as stated in Paragraph 8.9.4. I consider that the wording of the policy and text are flexible enough to address current guidance. In addition, I would expect SPG to be the subject of appropriate consultation. No modification of the Plan is needed.

Residents' parking, on-street parking provision and workplace charging - 830

8.36.11 The matters the subject of this part of the objection have more to do with traffic management measures than planning policy. They would be considered under the Local Transport Plan and inclusion within the UDP would not be appropriate. There is, in any event, an appropriate reference in Paragraph 8.9.3 of the Plan.

Car-free development - 830

8.36.12 In the Revised Deposit Plan, reference to car-free developments has been included within Paragraph 8.9.8. To my mind, this change meets the thrust of the objection and no modification of the Plan is necessary.

Parking generally as a maximum – 864, 865

8.36.13 Policy T11 states that parking provision will "generally" be restricted as a maximum to that which is justifiably required. However, it appears to me that maximum standards should be the rule. This would accord with the guidance in PPG 13, for example, in Paragraph 52. There is no need for the use of the word "generally" given that material circumstances may always point in a different direction. I recommend accordingly.

Hospital parking standards - 956

8.36.14 The parking standards in Appendix B of the Plan have been omitted from the Revised Deposit Draft. Reliance would be placed on the generality of Policy T11 and the related text. Pending the preparation of supplementary guidance, I consider that parking at hospitals could be appropriately considered in the light of the remaining provisions of the Plan. No modification is necessary.

Parking south of the river in Hereford - 959

8.36.15 Irrespective of land availability issues, specific provision for car parking immediately south of the river would encourage car trips to this part of the city centre in circumstance where the emphasis should be on non-car modes. In this regard, I would expect the park and ride car parks to be appropriately placed. They could be used for walkers and cyclists as well as those using public transport.

Extra car parking in Kington - 321

8.36.16 In relation to Bromyard, I have indicated that parking provision involves a number of inter-related matters and is best progressed through the

Local Transport Plan. The same applies in Kington. In addition, decisions on short-stay parking and the like are made outside the context of the UDP.

8.36.17 More generally, I would say that the Council's proposals reflect Government guidance. For example, by restricting parking in areas well served by public transport, they seek to encourage the use of non-car modes. However, I consider that there is sufficient flexibility to recognise local circumstances. In this regard, I am aware of the comments in the emerging Local Transport Plan (Document Q 19, Paragraph 8.8.13). Here it is noted that Kington has a fragile economy. "It is important here to ensure an adequate supply of parking, including both on and off street spaces."

8.36.18 I would expect such matters to be pursued through the LTP and through the appropriate application of parking policies under the UDP. However, no related modification of the Revised Deposit Draft is necessary.

Parking associated with County Hall - 365

8.36.19 The objector raises a number of matters in relation to parking and relocation of County Hall. In this regard, I do not see the need for any modification of the parking section of the Plan. To my mind, there is adequate guidance on the standards that should be applied. In addition, and in relation to any particular development, I would expect the effects of traffic generation to be taken into account. If there would be any unacceptable consequences, this would lead to the rejection of the related proposal.

RECOMMENDATIONS

8.36/1 In Policy T7, at the end of the first paragraph, insert "convenient, safe and" before "secure cycle parking". Use the same phrase in Paragraph 8.7.5.

8.36/2 In Paragraph 8.7.5, substitute "will be included in supplementary planning guidance" for "are set out in Appendix A".

8.36/3 In the second sentence of Policy T11, delete the word "generally".

8.36/4 Do not make any other modification in response to the objections.

8.37 EXISTING PARKING AREAS - POLICY T12 AND PARAGRAPHS 8.9.5 TO 8.9.7

Objections

P830/2394 Herefordshire Friends of the Earth
P864/2382 Transport 2000

Summary of Objections / Issues

- Policy T12 should be linked to park and ride. (830)
- There should be a commitment stronger than just encouragement of redeveloping private parking areas. (830)

- Whether redevelopment of non-residential parking would be allowed. (864)

Inspector's Reasoning and Conclusions

Link to park and ride - 830

8.37.1 Objection is raised to the failure to link existing parking areas to park and ride. However, I do not see the need for an explicit link. They are the subject of separate provisions, park and ride being dealt with under Policy T2 and Paragraph 8.4.5 as well as through the Local Transport Plan. Although both policies have the objective of reducing the need to travel by car, no modification of the Plan is needed.

Redevelopment of private parking areas - 830

8.37.2 I do not see that, in Policy T12, it would be possible to go further than to give encouragement to the redevelopment of private parking areas. Redevelopment is something that would be favoured and supported as indicated in the policy. However, it is not the intention of the Council to bring about forcibly redevelopment or reuse and no modification of the Plan is appropriate.

Non-residential parking - 864

8.37.3 The objector questions whether the policy would allow redevelopment of non-residential parking. To my mind, the policy covers all existing private parking areas including private non-residential parking. The policy is not aimed at continuing or increasing such parking. No clarification is needed.

RECOMMENDATION

8.37/1 Do not make any modification in response to the objections.

8.38 TRAFFIC MANAGEMENT SCHEMES - POLICY T13 AND PARAGRAPH 8.9.8

Objections

P44/222	National Farmers' Union
P44/10046	National Farmers' Union
W323/2857	CTC Right to Ride, Ledbury (Conditionally Withdrawn)
W329/658	Cradley Village Design Statement
P830/2396	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P864/2383	Transport 2000
P865/2434	Cyclists' Touring Club
P1189/10348	Breinton Parish Council
P1189/10349	Breinton Parish Council
RP1421/10452	Hereford City Council

Summary of Objections / Issues

- Farmers should not be prevented from taking their vehicles through villages. (44)
- The NFU should be consulted on the designation of quiet lanes. (44)
- Whether the scope of the policy is unnecessarily restricted. (323, 329, 864, 865)
- All proposals for traffic management should undergo a cycle audit. (323, 864, 865)
- There should be supplementary planning guidance on road design, layout and signing. (830)
- The effects of charging should be the subject of further discussion. (864, 865)
- Reference to quiet lane initiatives should be removed. (1189)
- Whether the policy should apply to the wider rural area. (1189)
- Schemes in Hereford should be subject to consultation with Hereford City Council. (1421)

Inspector's Reasoning and Conclusions

Farmers' vehicles - 44

8.38.1 The consultation arrangements in respect of traffic calming proposals are outside the scope of the development plan. However, I would expect full account to be taken of the likely effects of any such measures including whether or not farmers and growers would find difficulty in taking their vehicles through villages.

Consultation of designation of quiet lanes - 44

8.38.2 Consultation on the mechanics of the designation of quiet lanes in rural areas is a matter that falls outside the scope of the development plan. No related modification would be appropriate.

Whether the scope of the policy is unnecessarily restricted - 323, 329, 864, 865

8.38.3 In the Revised Deposit Draft, Policy T13 no longer indicates that traffic management schemes will be developed "periodically" or in relation to "selected" villages. Related objections have been met. There would be nothing in the Plan to prevent, for example, traffic management in Cradley from being taken forward under this policy. However, I do not see the need for any more specific reference to such schemes or to quiet lanes.

Cycle audits – 323, 864, 865

8.38.4 The Revised Deposit Draft now requires schemes to be subject to cycle audit. Related objections have been met and no modification of the Plan is needed.

SPG on road design, layout and signing - 830

8.38.5 Policy T13 now refers to the necessity to meet design guidance associated with the Plan. The objection has been conditionally withdrawn and no modification is necessary.

Effects of charging – 864, 865

8.38.6As stated in the Council's statement, road charging is not directly a planning policy issue in relation to traffic management schemes. Any specific scheme proposals arising as a consequence would still need to address the criteria in Policy T13. Nevertheless, reference has been made to charging in Paragraph 8.9.8 as part of the context for the policy. No other modification is necessary.

Quiet lane initiatives - 1189

8.38.7I appreciate that Breinton Parish Council has had difficulty in progressing a quiet lanes initiative. However, in other circumstances, there could be a different outcome. To my mind, it is quite legitimate to refer to quiet lanes as an example of a traffic management scheme that could be taken forward in rural areas and no modification of the Plan is necessary.

Application to the wider rural area - 1189

8.38.8I appreciate that amenity routes could be introduced on rural routes without the need for complicated or expansive traffic management schemes. However, it appears to me that the policy covers all possible eventualities including, for example, a scheme outside the market towns. No modification of the Plan would be appropriate.

Consultation with Hereford City Council on schemes in Hereford - 1421

8.38.9Hereford City Council has been told by Herefordshire Council that it will be consulted on traffic management schemes within the city. On this understanding, the City Council did not wish to pursue its objection at the inquiry and no modification of the Plan is necessary.

RECOMMENDATION

8.38/1 Do not make any modification in response to the objections.

8.39 SCHOOL TRAVEL - POLICY T14 AND PARAGRAPHS 8.9.10 TO 8.9.14

Objections

P786/1951	Much Birch Parish Council
P864/2385	Transport 2000
P865/2435	Cyclists' Touring Club

Summary of Objections / Issues

- There should be a school transport policy. (786)
- Provision should be made for individual travel plans. (864, 865)

Inspector's Reasoning and Conclusions

School transport policy - 786

8.39.1 Control over school traffic can be addressed in relation to new schools or the expansion of existing schools. In appropriate circumstances a school travel plan would be sought. I would expect school travel plans to deal with matters such as coaches and car transport. In these terms, a separate school transport policy would not be necessary. In other circumstances, attempts to make use of coach transport are likely to be outside the scope of the development plan.

Individual travel plans – 864, 865

8.39.2 I note that Paragraph 8.9.11 has been expanded so as to indicate linkages to other relevant travel policies. To this extent, the objections have been met and no modification of the Plan is necessary.

RECOMMENDATION

8.39/1 Do not make any modification in response to the objections.

8.40 AIR TRANSPORT FACILITIES - POLICY T15 AND PARAGRAPHS 8.10.2 - 8.10.3

Objections

P766/1903	Shobdon Parish Council
P830/2407	Herefordshire Friends of the Earth
P830/10991	Herefordshire Friends of the Earth
P864/2387	Transport 2000
P864/4302	Transport 2000

Summary of Objections / Issues

- Traffic using Shobdon Airfield is a major hazard. (766)
- Whether the favourable consideration of small scale airport proposals would be appropriate. (830)
- Whether Herefordshire's tranquillity would be jeopardised. (864)
- There should be reference to "maximum" mitigation. (864)

Inspector's Reasoning and Conclusions

Traffic using Shobdon Airfield - 766

8.40.1 I note that no expansion outside the boundaries of Shobdon Airfield is envisaged. However, in respect of any development on the existing industrial estate that requires planning permission, regard could be had to the effect on road users and pedestrians. Control would be exercised under relevant policies in the

Plan and account taken of increasing vehicle loading on rural roads. No specific provision is necessary in this respect.

Small scale airport proposals - 830

8.40.2 It appears to me that the support given to small scale airport proposals is well qualified. Account would have to be taken of the various matters referred to in the text and in the policy. A range of social and economic benefits would need to be taken into account in assessing overall sustainability. In the circumstances, I do not consider that the provisions are unacceptable or that any modification of the Plan is necessary.

Herefordshire's tranquillity - 864

8.40.3 Amongst other things, proposals generating undue noise would not be permitted. In this regard, I consider that adequate account would be taken of the county's tranquillity and no modification of the Plan is necessary.

Maximum mitigation - 864

8.40.4 In the Revised Deposit Plan, Paragraph 8.10.3 has been amended such that any adverse impacts would be mitigated as fully as possible. To my mind, this is an appropriate provision and no additional modification is necessary.

RECOMMENDATION

8.40/1 Do not make any modification in response to the objections.

8.41 ACCESS FOR ALL - POLICY T16 AND PARAGRAPHS 8.11.1 TO 8.11.2

Objections

W458/930	British Horse Society Herefordshire Branch (Conditionally Withdrawn)
P830/2409	Herefordshire Friends of the Earth
P864/2388	Transport 2000

Summary of Objections / Issues

- Provision for ridden horses and horse drawn carriages should be made. (458)
- Pedestrians and people with disabilities should have attractive street furniture and spaces. (830)
- The accessing of public transport by the disabled should be amongst the considerations. (864)

Inspector's Reasoning and Conclusions

Provision for ridden horses and horse drawn vehicles - 458

8.41.1I note that the main trust of Policy T16 is access for the disabled, older people and parents with young children. The objection has been conditionally withdrawn and no modification of the Plan is necessary.

Attractive street furniture and spaces - 830

8.41.2To my mind, the objector is seeking a level of detail that is inappropriate in a general policy. Policy DR3 already provides for safe, convenient and attractive movement, for pedestrians and people with disabilities, including pedestrian seating. Bearing in mind also the Council's intention to supplement its existing guidance on design and development requirements, I do not consider that any modification of the Plan is necessary.

Accessing of public transport by the disabled - 864

8.41.3It appears to me that this section of the Plan deals with those aspects of access to public transport by the disabled that would require planning permission. The topic as a whole is dealt with in the Local Transport Plan. No modification of the UDP is necessary.

RECOMMENDATION

8.41/1 Do not make any modification in response to the objections.

8.42 ACCESS TO RAIL FREIGHT SITES – PROPOSED NEW POLICY

Objection

P864/4255 Transport 2000

Summary of Objection / Issue

- Development should not impair access to identified rail freight sites. (864)

Inspector's Reasoning and Conclusions

Access to rail freight sites - 864

8.42.1It is my understanding that where road access needs to be safeguarded alongside a rail freight site, the land is identified on the Proposals Map and covered by the provisions of Policy T4. In these circumstances, I do not see that an additional policy on access to rail freight sites is needed.

RECOMMENDATION

8.42/1 Do not make any modification in response to the objection.

8.43 ADDRESSING NEEDS OF REMOTE RURAL COMMUNITIES – PROPOSED NEW POLICY

Objection

P1079/3293 Revd N Read and Ms A Holden

Summary of Objection / Issue

- There should be a specific policy addressing the transport needs of small, disadvantaged rural communities. (1079)

Inspector's Reasoning and Conclusions

Needs of rural communities – 1079

8.43.1 Paragraph 8.3.3 states that in some of the more rural parishes remote from public transport services it may not be possible to link new development with public transport and other services to reduce the need to travel by car. These and related issues are considered elsewhere in the Revised Deposit Plan, including under Sections 3.5 and 3.6 of the Strategy Chapter. The problems of service provision, including public transport, in thinly populated rural areas are well documented. I consider that it is unlikely that development on a scale appropriate in the countryside would be sufficient to underwrite existing services or affect population density to the extent that the economics of service provision would be transformed so as to affect public expenditure priorities significantly.

8.43.2I do not consider that any practical purpose would be served by introducing a specific policy dealing with these concerns in a land use plan. I consider that service provision in rural areas is more likely to be addressed through partnership and community initiatives. A strategy for integrated transport in the rural areas and market towns is set out in Section 2.2 of the Local Transport Plan (Document Q 11). I consider that the LTP is the appropriate forum to pursue these matters.

RECOMMENDATION

8.43/1 Do not make any modification in response to the objection.

8.44 RECOGNISING TRANSPORT NEEDS OF RURAL AREAS – PROPOSED NEW POLICY

Objection

P846/2236 Country Land & Business Association

Summary of Objection / Issue

- A policy recognising rural transport needs should be included in the Plan. (846)

Inspector's Reasoning and Conclusions

Rural transport needs – 846

8.44.1 I acknowledge that there are circumstances where, in parts of the county, the private car is the only sensible mode of transport. Such difficulties are recognised in Paragraph 8.3.3 of the Plan.

8.44.2 The underlying concern of the objector is that the development strategy is too restrictive on development in the countryside. Objections to the Strategy are considered in Section 3 of my report. I find generally that the approach of concentrating development in Hereford and the market towns, followed by the larger rural settlements, is broadly consistent with national policy which seeks a sustainable pattern of development. I consider that it would be inconsistent with the Plan's strategy to introduce a policy which adopted a more relaxed approach to accessibility considerations in rural areas.

RECOMMENDATION

8.44/1 Do not make any modification in response to the objection.

8.45 FURTHER CAR PARKING, PEMBRIDGE – PROPOSED NEW POLICY

Objection

P867/2454 Pembridge Parish Council

Summary of Objection / Issue

- There is an urgent need for additional parking spaces in and around Pembridge. (867)

Inspector's Reasoning and Conclusions

Parking in Pembridge – 867

8.45.1 Criteria for the consideration of parking provision are set out in Policy T11. The objector does not expand on the need for additional parking in the village or propose suitable locations. There is insufficient justification for me to recommend a modification to the Plan.

RECOMMENDATION

8.45/1 Do not make any modification in response to the objection.

8.46 BANNING HEAVY VEHICLES IN EARDISLEY – PROPOSED NEW POLICY

Objection

P771/1927 Mrs J Banbury

Summary of Objection / Issue

- HGVs should be banned from Eardisley. (771)

Inspector's Reasoning and Conclusions

Restriction on HGVs in Eardisley – 771

8.46.1 It appears to me that the Council is aware of the problems faced in Eardisley and neighbouring villages and is taking steps to address such matters. In the first instance, the Council has been undertaking a study of northwest Herefordshire with a view to gaining a better understanding of the movement of heavy goods vehicles through this part of the county. The final results of the study were not available at the inquiry. However, the Council was in a position to flag up a number of likely key proposals. These include a freight quality partnership; traffic management measures; and on-going monitoring such that longer term options could be kept under review.

8.46.2 I would expect that, through the sorts of measures envisaged by the Council, much could be done to reduce the impact of traffic on village communities and on the local environment. Freight quality partnerships could lead to routeing agreements and local road improvements; and traffic management could embrace a variety of measures including widening of footways, the introduction of speed limits, sensitive traffic calming and improved signing to industrial estates. The longer term option of a bypass would not be ruled out.

8.46.3 I consider there is insufficient justification to include a specific policy banning HGVs in Eardisley.

RECOMMENDATION

8.46/1 Do not make any modification in response to the objection.

8.47 SIGNPOSTING – PROPOSED NEW POLICY

Objection

P766/1921 Shobdon Parish Council

Summary of Objection / Issue

- Signposting should be improved to help visitors and emergency services. (766)

Inspector's Reasoning and Conclusions

Signposting – 766

8.47.1 To my mind this is a matter for highways management and it would be inappropriate to include a policy in the Plan.

RECOMMENDATION

8.47/1 Do not make any modification in response to the objection.

8.48 TARGETS FOR PUBLIC TRANSPORT – PROPOSED NEW POLICY

Objection

P743/1802 Ledbury Town Council

Summary of Objection / Issue

- Proper targets should be set for public transport. (743)

Inspector's Reasoning and Conclusions

Targets for public transport – 743

8.48.1 This matter is appropriately dealt with through the Local Transport Plan and is not appropriate for inclusion in the UDP.

RECOMMENDATION

8.48/1 Do not make any modification in response to the objection.