

13<sup>th</sup> January 2019

Hereford EZO Consultation  
Planning Services  
Herefordshire Council  
Plough Lane  
Hereford  
HR4 0EL

Thornbury House  
18 High Street  
Cheltenham  
GL50 1DZ

01242 230066  
[www.ridge.co.uk](http://www.ridge.co.uk)

Dear Sir/ Madam

**Hereford (Rotherwas) Enterprise Zone Local Development Order (2019) – Consultation response**

The representation has been prepared and submitted on behalf of Bloor Homes Western in relation to the above. Bloor Homes are the future applicants of a soon to be submitted planning application for a mixed use urban extension of land at Lower Bullingham - known as the 'Southern Urban Expansion' in the adopted Herefordshire Local Plan - Core Strategy - to provide amongst other things residential development, B1, B2 and B8 employment uses, a Neighbourhood Community Hub and a new primary school.

This Representation, whilst acknowledging the importance of the Hereford Enterprise Zone as an important catalyst for economic generation throughout the Marshes, recommends that a subsection of the additional area brought forward within the Herefordshire Local Plan strategy should be removed due to its importance to the Southern Urban Expansion.

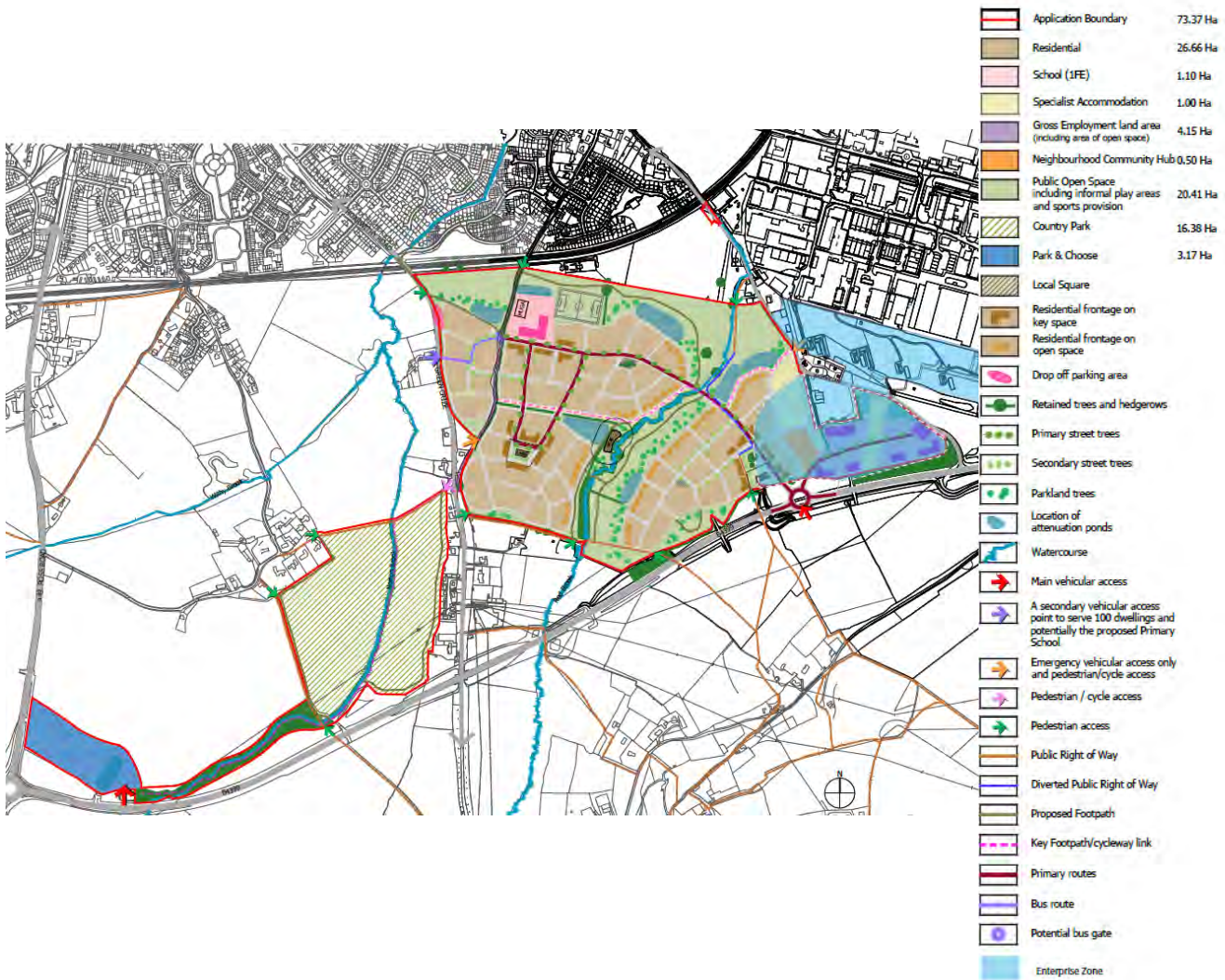
It is recognised that the Enterprise Zone will provide new employment workspace committed through the Local Development Order (LDO); providing both highly skilled jobs and encouraging further investment into the area. It is further acknowledged that the LDO will reduce the cost to developers and promote employment generation of the area through avoiding the need for individual planning applications to be made where proposals are in line with the Enterprise Zone, whilst also removing Section 106 obligations and future CIL requirements.

However, a small portion of the Enterprise Zone (as highlighted in the map below) actually forms part of the strategic allocation/masterplan for the Southern Urban Expansion of Lower Bullingham (set out in Policy HD6 of the Hereford Local Plan Core Strategy). This proposed development for the Southern Urban Expansion site has been brought forward as part of an extensive consultation process with Herefordshire Council over the past 5 years and is set to deliver a comprehensively planned sustainable urban expansion in line with the requirements of the Local Plan policy.

The piece of land in question will provide affordable housing, a neighbourhood centre, public open space and significantly development that will frame the entrance to this new strategic development. The loss of this land as a result would have significant implications for the design and deliverability of the scheme and its viability going forward. As I'm sure will be acknowledged the delivery of this significant strategic urban extension plays a fundamental role in the delivery of the aims and objectives underlying the Local Plan.

**Recommendation:**

It is therefore recommended that the small section of the Herefordshire Enterprise Zone should be removed to ensure the effective delivery of a strategically important site.



Please do not hesitate to contact me should you require further information.

Yours faithfully,

Guy Wakefield MRTPI  
Ridge

**From:** [ldf](#)  
**To:** [Gilson, Susannah](#)  
**Subject:** FW: Herefordshire (Rotherwas) LDO  
**Date:** 22 January 2019 09:42:48  
**Attachments:** [LP & MP - Herefordshire Rotherwas LDO.pdf](#)  
[MP Mains - Herefordshire Rotherwas LDO.pdf](#)

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LDO comment attached.

Kev

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**From:** Cashman, Vicky <[vicky.cashman@cadentgas.com](mailto:vicky.cashman@cadentgas.com)>  
**Sent:** 22 January 2019 09:32  
**To:** ldf <[ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)>  
**Subject:** Herefordshire (Rotherwas) LDO

Dear Sir/Madam

Thank you for consulting Cadent Gas on the Herefordshire Enterprise Zone LDO. Cadent has low pressure and medium pressure assets located within the Order boundary and would advise on the grounds of safety that any proposed development plans are submitted to [plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com) prior to works.

Kind Regards  
Vicky

**Vicky Cashman**  
**Consents Officer**

**Cadent**

Ashbrook Court, Central Boulevard, Prologis Park, Coventry CV7 8PE  
+44 (0)77 47671508

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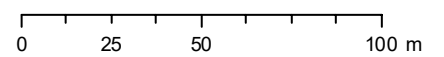
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# LP & MP Mains



January 22, 2019



## Potential Site Point

-  In Boundary
-  In Archived Boundary
-  Outside Boundary

# MP Mains



January 22, 2019

0 55 110 220 m

## Potential Site Point

- ★ In Boundary
- ★ In Archived Boundary
- ★ Outside Boundary

## Latham, James

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**From:** Idf  
**Sent:** 11 February 2019 09:56  
**To:** Gilson, Susannah  
**Subject:** FW: Hereford enterprise zone LDO

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

[Another LDO comment](#)

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**From:** Jane Hennell <Jane.Hennell@canalrivertrust.org.uk>  
**Sent:** 11 February 2019 09:29  
**To:** Idf <Idf@herefordshire.gov.uk>  
**Subject:** Hereford enterprise zone LDO

Thank you for your consultation on the Hereford enterprise zone LDO. The Canal & River Trust have considered the content of the document and have no comments to make in this case.

Jane Hennell MRTPI  
Area Planner  
The Canal & River Trust  
The Dock Office  
Commercial Road  
Gloucester  
GL1 2EB

Tel. 07747 897793

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### Keep in touch

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### Cadw mewn cysylltiad

Cofrestrwch i dderbyn e-gylchlythyr Glandŵr Cymru <https://canalrivertrust.org.uk/newsletter>  
Cefnogwch ni ar <https://www.facebook.com/canalrivertrust>  
Dilynwch ni ar <https://twitter.com/canalrivertrust> ac <https://www.instagram.com/canalrivertrust>

Mae'r e-bost hwn a'i atodiadau ar gyfer defnydd y derbynnydd bwriedig yn unig. Os nad chi yw derbynnydd bwriedig yr e-bost hwn a'i atodiadau, ni ddylech gymryd unrhyw gamau ar sail y cynnwys, ond yn hytrach dylech eu dileu heb eu copïo na'u hanfon ymlaen a rhoi gwybod i'r anfonwr eich bod wedi eu derbyn ar ddamwain. Mae unrhyw farn neu



The Coal  
Authority



200 Lichfield Lane  
Berry Hill  
Mansfield  
Nottinghamshire  
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)

Web: [www.gov.uk/coalauthority](http://www.gov.uk/coalauthority)

For the Attention of: Hereford EZO Consultation, Planning Services  
Herefordshire Council

**[By Email: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk) ]**

08 February 2019

Dear Hereford EZO Consultation, Planning Services

**Herefordshire District Council Local Development Order**

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on it.

Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.

Yours sincerely

**Christopher Telford BSc(Hons) DipTP MRTPI**  
**Principal Development Manager**

## Latham, James

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**From:** Idf  
**Sent:** 21 February 2019 10:11  
**To:** Gilson, Susannah  
**Cc:** Bloxsome, Bill  
**Subject:** FW: Hereford Enterprise Zone Local Development Order consultation  
**Attachments:** Amended LDO areas.JPG

Hi Susi

Please see below a late comment from Russell Pryce re: the LDO.

Regards

Kev

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**From:** Russell Pryce <Russell@collinsdb.co.uk>  
**Sent:** 21 February 2019 09:33  
**To:** Idf <ldf@herefordshire.gov.uk>  
**Subject:** Hereford Enterprise Zone Local Development Order consultation

Good morning

I have just picked up on this consultation and appreciate the consultation period has closed but would appreciate if the suggested revision below can be considered.

This concerns the proposed Rotherwas House Green Space Buffer – Section E (f) of the LDO.

We have just been instructed to progress a masterplan for a phased development of land north of Woodstock Trading but the current version of the LDO significantly limits the potential development area. I appreciate this buffer has been introduced for heritage reasons but consider the setting of the designated heritage assets could still be safeguarded with a new planting buffer and protected zone north of the current LDO boundary. The detail of this could be worked up in consultation with Historic England and the Council's historic building officers and could comprise a combination of planting and green space. This would also create a new biodiversity feature linking with the existing woodland strip running northward to the River Wye.

I attach the LDO plan where I have marked up the suggested change. Apologies this is rather crude but as we have only just been appointed we have not yet had time to commence work on a masterplan.

Our proposal will also include the use of the existing pond as a SUDS feature which may mean this needs to be re-profiled and it's not clear if the current version of the LDO would permit this and therefore we request this existing pond be removed from the proposed protected green space buffer.

I look forward to hearing from you.

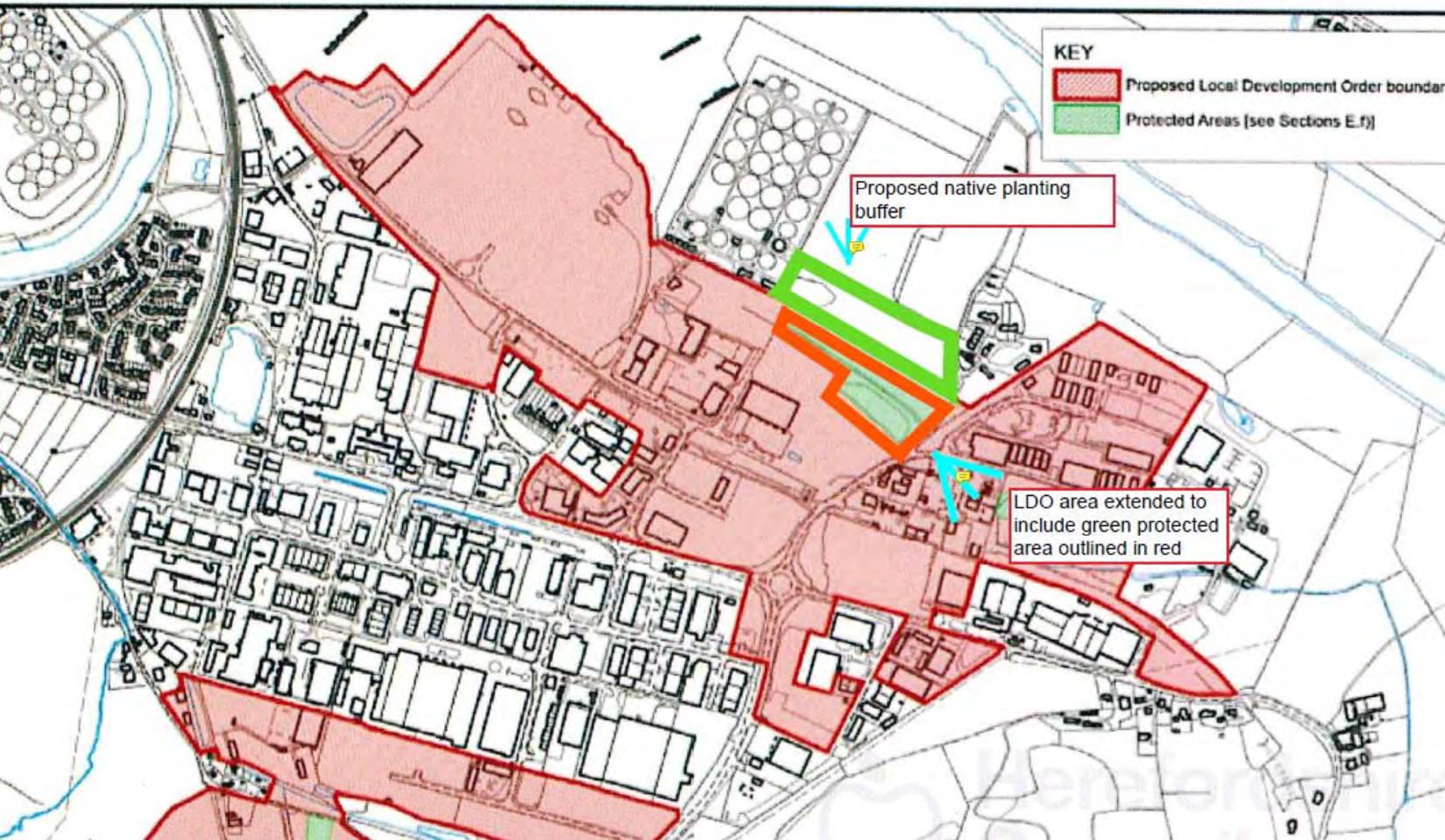
Kind regards

**Russell Pryce MRTPI**  
**Planning Manager**

**CDB Planning and Architecture**  
Unit 5, Westwood Industrial Estate, Pontrilas, Herefordshire, HR2 0EL  
**T:** 01981 242928 | **M:** 07931 808200  
**E:** [russell@collinsdb.co.uk](mailto:russell@collinsdb.co.uk) | [www.collinsdb.co.uk](http://www.collinsdb.co.uk)







**KEY**

- Proposed Local Development Order boundary
- Protected Areas [see Sections E.f)]

Proposed native planting buffer

LDO area extended to include green protected area outlined in red

HEREFORDSHIRE COUNCIL  
PLANNING SERVICES  
DEVELOPMENT CONTROL

13 FEB 2019



Dear Sirs,

11/2/19.

To: Proposed Development At Enterprise Zone  
Rotherwas

I understand you are wanting to develop land off Fordshill Road, which I am told you do not own at the present time!

Fordshill Road is a very busy road traffic wise carrying traffic of all descriptions to Sigoric Estate, as well as to Wye Valley Demolition and all its many works under that name, so there would be many difficulties for vehicles wanting to service the proposed business if this new proposal is carried out.

No doubt you are aware of the M.E.B. Power line crossing this particular field. You will also be aware that the ~~house~~ bungalows on the opposite side of the ~~B4327~~ <sup>B4399</sup> will be greatly devalued?

I understand from the Hereford Times this week you are having difficulty in finding "Takers" for the very nice development opposite the Felling Station on the Straight Mile!!

You will understand from this letter I am not in favour of this proposed Development. A few years ago a housing development was refused on this particular field.

Yours faithfully,

**Latham, James**

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**From:** Norman Ryan <Ryan.Norman@dwrcymru.com>  
**Sent:** 08 February 2019 09:49  
**To:** Gilson, Susannah  
**Subject:** RE: Enterprise Zone Local Development Order consultation

Dear Susannah,

I refer to the below consultation and would like to thank you for consulting Welsh Water.

From our perspective, the specifics on foul/wastewater remain as per the current iteration of the LDO and as such we have no comment to make.

If you have any queries, please let me know.

Kind regards,



**Ryan Norman**  
**Forward Plans Officer | Developer Services | Dwr Cymru Welsh Water**  
Linea | Cardiff | CF3 0LT | T: 0800 917 2652 | [www.dwrcymru.com](http://www.dwrcymru.com)

*We will respond to your email as soon as possible but you should allow up to 10 working days to receive a response. For most of the services we offer we set out the timescales that we work to on our Developer Services section of our website. Just follow this link <http://www.dwrcymru.com/en/Developer-Services.aspx> and select the service you require where you will find more information and guidance notes which should assist you. If you cannot find the information you are looking for then please call us on 0800 917 2652 as we can normally deal with any questions you have during the call.*

*If we've gone the extra mile to provide you with excellent service, let us know. You can nominate an individual or team for a Diolch award through our [website](#).*

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**From:** Gilson, Susannah [mailto:Susannah.Gilson@herefordshire.gov.uk]  
**Sent:** 17 January 2019 10:58  
**To:** Norman Ryan <Ryan.Norman@dwrcymru.com>  
**Subject:** Enterprise Zone Local Development Order consultation

\*\*\*\*\* External Mail \*\*\*\*\*

**Town and Country Planning (Development Management Procedure) (England) Order 2015. Notice under Article 38 of proposal for Local Development Order Granting Planning Permission. Proposed development at Hereford Enterprise Zone, Rotherwas**

I give notice that the County of Herefordshire District Council (Herefordshire Council) proposes to make a Local Development Order granting planning permission for development falling within Class B of the Town and Country Planning (Use Classes) (Amendment) Order 2010.

A copy of the draft revised order with statement of the Council's reasons for making the order are available for inspection at:

- Hereford Customer Services, Blueschool House, Blueschool Street, Hereford
- Hereford Library, Broad Street, Hereford
- Herefordshire Council Offices, Plough Lane, Hereford

## Latham, James

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**From:** James, Nick  
**Sent:** 01 February 2019 08:47  
**To:** Gilson, Susannah  
**Subject:** FW: New Planning - CIVICA 274033. FW: Enterprise Zone Local Development Order consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good Morning Susi,

I refer to the above and would make the following comments in relation to contaminated land and human health issues.

The revised Draft LSO seems to retain the contaminated land conditions of the original (numbers 12 and 13) and as such, I've no comments to make.

Kind regards

Nick

Nick James  
Principal Technical Officer (Air, Land and Water Protection),  
Environmental Health & Trading Standards,  
Economy, Communities and Corporate Directorate,  
8 St. Owens Street,  
Hereford. HR1 2PJ.  
Direct Tel: 01432 261684  
email: [njames@herefordshire.gov.uk](mailto:njames@herefordshire.gov.uk)

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**From:** Boreham, Marian  
**Sent:** 17 January 2019 14:16  
**To:** James, Nick; Burrage, Susannah; Hargraves, Philippa  
**Subject:** New Planning - CIVICA 274033. FW: Enterprise Zone Local Development Order consultation

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**From:** Burrage, Susannah  
**Sent:** 17 January 2019 13:02  
**To:** Ethelpline <[ethelpline@herefordshire.gov.uk](mailto:ethelpline@herefordshire.gov.uk)>  
**Subject:** MBO. CIVICA 274033. FW: Enterprise Zone Local Development Order consultation

Please can you on SRU for me, Nick and Philippa with regard to the consultation below. Many thanks Susannah

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**From:** Gilson, Susannah  
**Sent:** 17 January 2019 10:59  
**To:** Burrage, Susannah  
**Subject:** Enterprise Zone Local Development Order consultation

**TO: DEVELOPMENT MANAGEMENT- PLANNING AND  
TRANSPORTATION  
FROM: ENVIRONMENTAL HEALTH AND TRADING  
STANDARDS**



**APPLICATION DETAILS**

274033 /

Rotherwas Enterprise Zone

Susannah Burrage, Environmental Health Officer

I have received the above application on which I would be grateful for your advice.

The application form and plans for the above development can be viewed on the Internet within 5-7 working days using the following link: <http://www.herefordshire.gov.uk>

I would be grateful for your advice in respect of the following specific matters: -

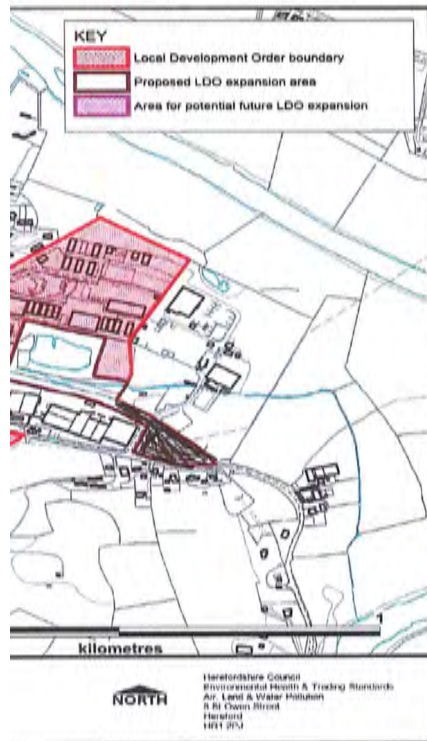
	Air Quality		Minerals and Waste
	Contaminated Land		Petroleum/Explosives
	Landfill		Gypsies and Travellers
	Noise		Lighting
	Other nuisances		Anti Social Behaviour
	Licensing Issues		Water Supply
	Industrial Pollution		Foul Drainage
	Refuse		

Please can you respond by ..

**Comments**

My comments are with regard to potential noise and nuisance issues that might arise from development.

I have attached a marked map of Map 1 – LDO Area (page 12 of the Environmental Report). Our department objects to the expansion of the enterprise zone into the far south eastern corner as marked on the attached.



My understanding of extending the boundary of the Enterprise Zone is that the area marked would mean that heavy industry ie B2 use class would be permitted in this area. This is inappropriate and could cause noise and/or nuisance issues for the residential occupants immediately to the south.

There is a natural buffer currently in this area separately heavy industry from domestic properties and I am of the opinion that this area should be subject to the usual planning controls including the imposition of conditions restricting the use of potentially noisy plant and equipment at the site as required through the usual planning process.

Signed: Susannah Burrage  
 Date: 13 February 2019

Herefordshire Council  
Planning Services  
Herefordshire  
HR4 0EL

**Our ref:** SV/2018/109876/OR-  
22/PO1-L01

**Your ref:**

**Date:** 14 February 2019

Dear Sir/Madam

### HEREFORD EZO CONSULTATION

I refer to your email of the 17 January 2019 in relation to the revised Local Development Order (LDO) for the Hereford Enterprise Zone in Rotherwas. We have reviewed the submitted LDO (dated January 2019), and associated Environmental Report, and would offer the following comments at this time.

**Flood Risk:** As discussed on previous iterations of the LDO this site lies within Flood Zone 2 and 3, the medium and high risk zones respectively. We have worked with your Council historically on the development of this site which has resulted in the Rotherwas Drainage and Flood Management Strategy. This Strategy was produced as an evidence document to ensure that development on the Enterprise Zone would be safe without any increase in flood risk to third parties. Since the creation of this document, and the LDO, we have introduced updated climate change guidance (attached). However, for Less Vulnerable Development, such as that on the Enterprise Zone, the climate change requirement for the area is 20% and 25% which means that floor levels would not need revisiting for the existing strategy or the proposed expansion including flood risk reduction where possible.

However it is proposed to extend the Enterprise Zone (Map 1 – LDO Refers), both with the proposed ‘expansion area’ and the ‘area for potential future LDO expansion’. For the former the impact of developing this plot does not appear to have been addressed. The plot is partially within Flood Zone 3, the high risk zone, and any development on the site would potentially increase flood risk to third parties. We would therefore expect revisions to the Flood Management Strategy to consider this plot and the need for additional compensatory storage to offset this expansion.

With regard to Condition 8 of the LDO reference is made to revisions/modifications to this Flood Strategy and again within section 3 of the LDO (reasons for conditions) which states that further work has been undertaken to update the (flood) Strategy and develop further measures that may be necessary. From recent discussions with your Council we understand that this is the case and we would welcome the opportunity to discuss this

Environment Agency  
Hafren House, Welshpool Road, Shelton, Shropshire, Shrewsbury, SY3 8BB.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

moving forward to ensure new plots are designed to be similarly safe without increasing flood risk to the third parties or impacting on the flooding regime in the area. We would not wish to see this site developed, or the land raised to accommodate the development, until the impacts of doing so are understood and mitigated.

In consideration of the above we are aware of a significant development on the Lower Bullingham site, to the immediate south of the Enterprise Zone. This is a strategic site in your Core Strategy and considered a viable option for strategic flood risk management which may benefit the Enterprise Zone. It is understood that modelling work is being undertaken for both the Enterprise Zone and the Lower Bullingham site and any potential interaction that may provide flood risk benefits should be considered.

**Land Contaminated:** Similar to the above we have historically engaged with your Council on the potential contamination present across the Enterprise Zone area and the possible impacts on controlled waters including the River Wye (SSSI/SAC).

As you are aware national planning guidance advocates a precautionary approach to development. In terms of the draft LDO, we recognise that by simplifying planning arrangements through granting planning permission for certain forms of development thereby avoiding the need for individual planning applications to be made where proposals accord with the aspirations for the Enterprise Zone'. However contaminated land issues can also be potential costly and time consuming matters.

On this basis it would also be advantageous, as previously stated, to address these issues upfront and in a strategic/holistic way rather than piecemeal manner. Piecemeal investigation/remediation may prove to be ineffective if significant or larger scale contaminated issues are identified, particularly if the development is phased through time.

To inform the LDO we would recommend that the scale and nature of any contamination is established i.e. known potential or identified previous contaminative use. Once a desk top study/preliminary risk assessment has been produced, a Site Investigation (SI) and remediation works may need to be undertaken. These requirements could form part of planning conditions but there may be complications if the SI and any remediation needs to be implemented strategically i.e. across the phase as a whole.

On Page 15 (of the main document) it is stated that '*Herefordshire Council will review from time to time the need to investigate whether contamination is present and if there is a need for a strategic approach to addressing its presence that would benefit the release of land within the area covered by the LDO. The Council will advise those utilising this LDO whether such work has been undertaken that might affect their site*'. This would suggest that the implications and complications with a piecemeal approach has been recognised and that such issues should be addressed up front.

Given the potential for pre-existing land contamination issues, foundation design will need to address such aspects. A foundation works risk assessment should be submitted with any proposals, so it can be demonstrated that the works will not enhance the extent or migration of any contamination.

Any sustainable urban drainage systems should be designed with regard to land contamination and the potential for mobilisation of contaminants. It is also necessary to ensure appropriate pollution prevention measures are adopted to ensure that any 'new inputs' are indiscernible.



Appropriate consideration of the above aspects is essential as there are a number of private water supplies in the area and the underlying superficial deposits will provide baseflow to the River Wye SSSI/SAC).

We would also recommend consultation with your Environmental Health (Public Protection) section.

**Water Quality:** Section 3.18 refers to the potential impacts of the continued development of the Enterprise Zone on wastewater drainage and water quality. As stated in the document the site lies immediately adjacent to the River Wye which, as stated above, is designated as a SAC. Previous modelling by the Environment Agency confirmed that the proposed level of growth could be delivered without breaching the conservation objectives for the Wye SAC. Whilst it is not envisaged that the modest expansion of the Enterprise Zone would compromise this target, and we would raise no objections, further ongoing consideration of the impact on the Wye should be maintained. It is noted that the current wastewater conversion anticipates that development of the Enterprise Zone would equate to 520 dwellings whereas this was previously 714. We also note that 'where it is not possible to conclude that there will be no likely significant effect on the River Wye SAC then the Local Planning Authority would exclude development through Part E.d of the Local Development Order.

As stated in the associated Environmental Report the information within the LDO is based upon data provided by both the Environment Agency and Welsh Water in 2012. Further consideration of these targets is likely to be required as evidence to inform future strategic planning work within Herefordshire, including the forthcoming Hereford Area Plan (HAP) and Mineral and Waste DPD, and should headroom capacity change this will need to be considered in development, or phasing, of the Enterprise Zone.

The Environment Agency, along with Welsh Water and Natural England, form part of the Nutrient Management Plan Board which allows ongoing discussion around the management of the Wye SAC and any mitigation measures to address phosphate and water quality issues.

Yours faithfully

**Mr. Graeme Irwin**  
**Senior Planning Advisor**  
Direct dial: 02030 251624  
Direct e-mail: [graeme.irwin@environment-agency.gov.uk](mailto:graeme.irwin@environment-agency.gov.uk)



Herefordshire Council  
Hereford EZO Consultation  
Planning Services  
Herefordshire Council  
Plough Lane  
Hereford  
HR4 0EL

24<sup>th</sup> January 2019

Dear Sir,

**Town and Country Planning (Development Management Procedure) (England) order 2015. Notice under Article 38 of proposal for local development order granting planning permission. Proposed development at Hereford Enterprise Zone.**

Please accept this letter as a formal, strong objection to the proposed amendments.

I have lived at this address for just over 10 years and in that time I have watched the sprawl of the "Industrial Estate" gradually creep towards me and envelop the area. The developing area is large and I fail to see how the small area of land opposite me is of any benefit .

For my neighbours and me, that area is a very much needed buffer to Wye Valley Reclamation etc, etc, and the sight, sound, air and light pollution we suffer with them operating opposite us. They are expanding all the time, which makes the junction and Fordshill Road very busy and a potential accident zone all day and everyday. Further traffic using that road is not sensible. The thought of further industrial buildings on that ground which would face us every day is very forboding.

I have read some of the reports mentioned in the letter to us and "habitat" is mentioned many times. That area of land is a perfect habitat for wildlife and is frequented by buzzards, kestrels, crows, magpies, foxes etc. As a keen ornithologist I value that area greatly.



You may or may not know that barn owls are a threatened species, as reported on BBC Breakfast Time last week. A barn owl regularly quarters that ground and is a wonderful spectacle to see, as it happens it was there last night. The loss of this hunting area for it would be a tragedy. The wildlife "habitat" as far as I can see was not mentioned in the reports.

I would strongly ask that an officer/s come and speak with my neighbours and I and view the whole site with us and listen to our comments before any decisions are made.

Yours faithfully

A solid black rectangular box used to redact the signature of Helen Roberts.

Helen Roberts

A solid black rectangular box used to redact contact information, likely a phone number or email address.



Kevin Singleton  
Herefordshire Council  
Hereford RZO Consultation  
Planning Services  
Plough Lane  
Hereford  
HR4 0EL

6<sup>th</sup> February 2019

Dear Kevin,

**Town and Country Planning (Development Management Procedure) (England) order 2015. Notice under Article 38 of proposal for local development order granting planning permission. Proposed development at Hereford Enterprise Zone.**

Further to our telephone conversation of 1<sup>st</sup> February, I am writing with further reasons why I oppose the proposed amendments as you suggested.

There are many empty units on Rotherwas Estate and many people wonder why new buildings are going up when there are so many old and tired buildings that need using and bringing back to life. So why new builds on a small area of green right opposite me when there are buildings already sited on the estate with access roads already in place. As I mentioned to you, Fordshill Road is extremely busy, with lorries arriving and leaving from 4.00am onwards also the staff arrive even earlier, staff who arrive with their music booming out of their vehicles. I do not want to listen to anymore car doors banging and roller doors opening and shutting at either end of the day. We already suffer from light pollution from the buildings already opposite us, to have more security lights on the new buildings is not acceptable.

There are also high voltage electricity cables going right over the top of the area that is being proposed for development. I have looked east and west of the site and not seen any other buildings under these wires. Does anyone with the power to grant this permission actually know about these wires?



Any development opposite myself and my neighbours is going to devalue our properties. Nobody wants to live opposite a scrap yard and put up with what we have to put up with, this area was once open fields and residential and now it is an industrial eyesore and is set to get worse if this permission is granted. A representative from Herefordshire Council advised my neighbour "to move" when he complained about the mess across the road, helpful ! My point being, no one will want to come to live here with the proposed planning permission granted and even if we found a buyer we would not want to sell our properties for a lesser value that the proposed development would give them, so we are trapped here.

As I mentioned in my first letter, we really want someone to come and look at the situation with us and have a meaningful conversation about the whole situation. You said that you would look into this, I trust you will, I look forward to a meeting. This situation is very serious to us and we would like it taken seriously.

Yours sincerely



Helen Roberts



HEREFORDSHIRE COUNCIL PLANNING SERVICES DEVELOPMENT CONTROL
07 FEB 2019
To.....
Ack'd..... File.....

## Latham, James

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**From:** ldf  
**Sent:** 14 February 2019 09:14  
**To:** Gilson, Susannah  
**Subject:** FW: Here for Hereford response to HEZ LDO consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

[Another LDO comment](#)

[Kev](#)

**From:** Victoria Wegg-Prosser  
**Sent:** 13 February 2019 20:42  
**To:** ldf <ldf@herefordshire.gov.uk>  
**Subject:** Here for Hereford response to HEZ LDO consultation

Submitted by email from Honorary Secretary Victoria Wegg-Prosser

ADDRESS REDACTED

Please acknowledge receipt to the above email address. Thank you.

Preamble : Here for Hereford is a non-political environmentalist local residents group holding the Council to account and providing a forum for debate. Follow us on Facebook and Twitter.

Here for Hereford welcomes the opportunity to respond to the Council's current consultation on the Hereford Enterprise Zone Local Development Order.

With new entrants from outside the County to the EZ consisting only of 6 firms at the moment (See Report in *Hereford Times* 7/2/19) and, to date, only 665 individuals working there, it is clear that the LDO should be extended, as recommended by the Council. Such extension will continue to bestow commercial advantage to new entrants on the EZ.

Here for Hereford agrees that such advantage needs to be limited to the period in which the EZ has attracted sufficient development to achieve a defined level of growth.

Here for Hereford accepts that the Council chooses to define this level of growth by measuring levels of road-based Development Trip Generation; once the agreed level is exceeded then the normal planning application process will be required for further development. Continuing a commercial benefit to new entrants after agreed levels of growth have been attained would be unfair. In addition the Council and the County benefit from such growth and it is hoped that such growth at the HEZ will be achieved. Thereafter, as recommended by the Council, new entrants to the HEZ will be required to seek planning permission in the usual way. Travel plans and sustainable construction methods will, of course, be required in any case.



Hereford Civic Society  
c/o 43 Villa Street,  
Hereford, HR2 7AU

E-mailed to Susannah Gilson,  
Local and Neighbourhood Development Community Engagement Officer  
Herefordshire Council  
Susannah.Gilson@herefordshire.gov.uk

Date: 14<sup>th</sup> February, 2019

**Town and Country Planning (Development Management Procedure) (England) Order 2015. Notice under Article 38 of proposal for Local Development Order Granting Planning Permission. Proposed development at Hereford Enterprise Zone, Rotherwas**

Proposed Herefordshire Council Local Development Order granting planning permission for development falling within Class B of the Town and Country Planning (Use Classes) (Amendment) Order 2010. (Consultation deadline 15/2/19)

Thank you for your letter of 17<sup>th</sup> January inviting Hereford Civic Society to respond to the above. We wish to comment as follows:

In general Hereford Civic Society is content with the proposed extension of the LDO applying to the HEZ. However we would urge development to:

- 1) Meet the highest standards of resource (energy, materials and water) efficiency in new buildings. We would suggest BREEAM 'Excellent' at minimum rating  
**Reason:** To promote higher standards in design and resource use which ultimately meet the needs of a zero carbon future by 2030 at the latest
- 2) Provide for a fully integrated public and active transport system which prioritises non car travel choice for employers between the HEZ and residential and retail areas.  
**Reasons:** To ensure a pleasant working environment with first class active and public transport links to residential and retail areas in the city.  
To ensure the cap relating to vehicle trip generation affecting especially Holme Lacy Road and the A49 is adhered to.
- 3) Keep to a defined level of growth that is contained within sustainable environmental parameters and pre-agreed geographical limits.  
**Reason:** To ensure the scale of development is proportional to need and location
- 4) Favours high rather than low skill companies and actively discourages warehouse/distribution centre type operations  
**Reasons:** So that there is a sector within Herefordshire's economy that is relatively high wage  
For the avoidance of generating large volumes of vehicle movements.

5) Enhance and not compromise the setting or survival of the remaining structures of the wartime munitions factory or of Rotherwas Chapel, a property in care of English Heritage.

**Reason:** To protect the interests of built heritage and the quiet enjoyment of historic amenity

6) Protect archaeological sites, mindful of the finding of the 'Rotherwas Ribbon' and associated prehistoric remains nearby.

**Reason:** To strengthen protection for the heritage and archaeological sites in the area of the HEZ to ensure these are adequately preserved.

7) Be appropriately informed by direction contained within the Design Code SPD (currently in draft)

**Reason:** To ensure the standard of architecture on the site is improved.

8) Support the development of NMiTE or similar university for Hereford for open and non-military research and education.

**Reason:** To recognise that, in lieu of S106 contributions, companies benefiting from development at the HEZ, contribute appropriately to wider social and environmental costs in the interests of transparency and peace.

9) Allow for a bridge crossing the R Wye on the line of the Rotherwas Access Road

**Reason:** To ensure that should a crossing be required here in the future to link the HEZ with the N side of the Wye, it can be built.

Yours sincerely,

Jeremy Milln, Chair



**From:** [ldf](#)  
**To:** [Gilson, Susannah](#)  
**Subject:** FW: Hereford EZO consultation  
**Date:** 21 January 2019 11:27:21

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[LDO comment attached](#)

**From:** Dominic Horne  
**Sent:** 21 January 2019 10:15  
**To:** ldf <ldf@herefordshire.gov.uk>  
**Subject:** Hereford EZO consultation

Has any consideration been given to protecting the trackbed of the former Hereford to Ross railway line which runs through the site? In the future it may be desirable to reinstate this route.

*Dr Dominic Horne  
Clinical Vice Chair, Herefordshire CCG  
Honorary Senior Lecturer, University of Worcester  
Member NICE Indicators Advisory Committee  
NIHR Clinical Research Network GP Research Champion, Herefordshire*

Our ref:  
Your ref: Hereford EZO Consultation

Adrian Chadha  
Highways England  
Assistant Asset Manager  
The Cube  
199 Wharfside Street  
Birmingham B1 1RN

Bill Bloxsome  
Herefordshire Council  
Plough Lane  
Hereford  
HR4 0LE

8 February 2019

via Email: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

Dear Bill,

### **Hereford (Rotherwas) Enterprise Zone (HEZ) Local Development Order (LDO)**

Thank you for forwarding Highways England further details in relation to the Hereford (Rotherwas) Enterprise Zone Local Development Order 2019.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). This network is a critical national asset and as such Highways England work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. The SRN within close proximity to the Hereford Enterprise Zone (HEZ) is the A49 trunk road.

We provided initial comments with regard to the proposed HEZ extension in September 2018. It was noted that, due to Herefordshire Council's proposals to include additional expansion zones, the existing caps on total traffic arising from development within the LDO may need to be reconsidered. We identified that consideration could be given to any extant traffic generation associated with elements of previously developed land to be included within the new boundaries of the LDO as well as any further suitable transport measures to be introduced. We concluded that any alteration to traffic caps would need to be supported by suitable evidence.

Highways England has reviewed the latest details provided in January 2019 and acknowledges that the proposed extension to the HEZ no longer includes greenfield land to the east. However, no evidence has been provided of any existing traffic associated with brownfield areas that are proposed to be included in the extension. While we do not object to the renewal and extension of the HEZ in principal this must be on the condition that the previous Memorandum of Understanding (MoU) between Highways England and Herefordshire Council is maintained at the agreed traffic caps or evidence provided to demonstrate the acceptability of any changes.

We would welcome the submission of further information based on our comments so that we may consider our position on the proposed extension. In the meantime, if you should have any questions regarding our response please do not hesitate to contact me

Yours sincerely,

Adrian Chadha  
Midlands Operations Directorate  
Email: [Adrian.Chadha@highwaysengland.co.uk](mailto:Adrian.Chadha@highwaysengland.co.uk)

Ms Susi Gilson  
Herefordshire Council  
PO Box 230  
Blueschool House  
Blueschool Street  
Hereford  
HR1 2ZB

Direct Dial: 0121 625 6820

Our ref: PL00536974

25 January 2019

Dear Ms Gilson

**Town and Country Planning (Development Management Procedure) (England) order 2015. Article 38 Notice, Rotherwas LDO.**

Thank you for consulting Historic England regarding a Notice under Article 38 of the proposed Local development Order regarding development at Rotherwas Enterprise Zone, Hereford.

Historic England has no objection in principle to this proposal.

We recommend that you consult with the Council's own specialist building conservation and archaeological advisors with regard to the detailed proposals for development so that the significance of the historic environment can be properly incorporated into detailed plans. A mitigation strategy for the historic environment may be required in order to ensure that proposals are fully informed. As well as direct impacts the potential impact upon the historic environment caused by development within the setting of heritage assets should also be considered.

In particular we draw your attention to the Rotherwas Industrial Estate Heritage Assessment and Conservation Management Plan undertaken by Herefordshire Archaeology, report no 312. This reports gives a useful baseline for the area. There are a number of listed buildings within the Enterprise Zone area, as well as other sites recorded on the Council's Historic Environment Record, including structures relating to the former munitions works at Rotherwas. We also highlight two scheduled ancient monuments in the area, these are Lower Bullingham Deserted Medieval Village., Heritage List for England ref: 1005320, and the site of Rotherwas House, including formal gardens and the Rotherwas Chapel (also maintained as an English Heritage Trust visitor site) , HLE ref: 1014880.

Finally we mention the need to protect the site of the Rotherwas Ribbon, a prehistoric feature that has been the subject of excavation and research. This resulted in measures being taken to afford physical protection to the now-buried archaeology of that site.



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6870  
HistoricEngland.org.uk





Historic England

WEST MIDLANDS OFFICE

Please get in touch if you require additional information at any stage,

Yours sincerely,

Bill Klemperer  
Principal Inspector of Ancient Monuments  
[bill.klemperer@HistoricEngland.org.uk](mailto:bill.klemperer@HistoricEngland.org.uk)

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6870  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.*

## Latham, James

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**From:** Knight, Matthew  
**Sent:** 25 January 2019 12:14  
**To:** Gilson, Susannah; Singleton, Kevin  
**Cc:** ldf  
**Subject:** RE: Enterprise Zone Local Development Order consultation

Thank you for consulting the Historic Environment Team on the revised EZ LDO.

We would note:

- The Shell Store, Blast Walls and Bunkers to the North of the site are considered non-designated Heritage Assets (NDHA's).
- The Historic England Listing Selection Guides are a recognised way of determining the significance of such assets. (<https://historicengland.org.uk/images-books/publications/dlsg-military/> )
- The Historic England guide gives more information on NDHA's: <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>
- More information is available on the HER and in the various local history books on the Rotherwas Munitions Factory.
- Whilst being a NDHA does not bring into play the consent regime of the P(LB&CA)Act 1990, it is a material planning consideration under the various policies within the NPPF and adopted Herefordshire Core Strategy for any works which require consent.

Our comments on the LDO are:

- The LDO doesn't change the protection of the non-designated heritage assets from demolition, however it does mean that the impact on the significance of these assets due changes to these structures might not be considered as part of the normal planning process. We would ask that if there is a way in which these assets can be retained as part of any development proposals, or that this intent can be officially recognised or recorded we would be very grateful.
- Can a statement of significance for the NDHA's be included within any documentation for the EZ and/or LDO?

Regards

Matthew

**Herefordshire.gov.uk**

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**Matthew Knight** BSc BArch RIBA PgDipCons

Principal Building Conservation Officer

Historic Environment Team

Plough Lane

Hereford

HR4 0LE

[matthew.knight@herefordshire.gov.uk](mailto:matthew.knight@herefordshire.gov.uk)

01432 260321

07792 882031



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**From:** Gilson, Susannah  
**Sent:** 17 January 2019 10:26  
**To:** Knight, Matthew <Matthew.Knight@herefordshire.gov.uk>  
**Subject:** Enterprise Zone Local Development Order consultation

**Latham, James**

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**From:** Kath Greenow <clerk@lowerbullinghamparishcouncil.co.uk>  
**Sent:** 14 February 2019 13:36  
**To:** Bloxsome, Bill  
**Subject:** re L.D.O Consultation

Dear Bill

The Parish Council have considered the consultation on the updating of the .L.D.O and suggest that the 5 hectares of employment land is not developed until the roundabout is in place as part of the Southern Urban Expansion area

Also access via Watery Lane from Holme Lacy road must not be permitted . Access to and from the employment land must be via the relief road only .

Thank you

Kath Greenow Cert He CEG AILCM

Parish Clerk

Lower Bullingham Parish Council

## Latham, James

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**From:** Idf  
**Sent:** 18 January 2019 08:38  
**To:** Gilson, Susannah  
**Subject:** FW: Town and Country Planning (Development Management Procedure) (England) Order 2015. Notice under Article 38 of proposal for Local Development Order Granting Planning Permission. Proposed development at Hereford Enterprise Zone, Rotherwas

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**From:** mike willmont  
**Sent:** 18 January 2019 08:20  
**To:** Idf <ldf@herefordshire.gov.uk>  
**Subject:** Town and Country Planning (Development Management Procedure) (England) Order 2015. Notice under Article 38 of proposal for Local Development Order Granting Planning Permission. Proposed development at Hereford Enterprise Zone, Rotherwas

My comment on the revised LDO is that any submission made under it should be included on the planning public register of applications so that the public can be aware - even if they are not able to comment

Mike Willmont



**Latham, James**

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**From:** Idf  
**Sent:** 18 February 2019 08:24  
**To:** Gilson, Susannah  
**Subject:** FW: Enterprise Zone Local Development Order consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

LDO comment attached

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**From:** Higgins, Gillian <Gillian.Driver@naturalengland.org.uk>  
**Sent:** 15 February 2019 16:55  
**To:** Idf <ldf@herefordshire.gov.uk>  
**Subject:** Enterprise Zone Local Development Order consultation

Dear Susi

**Re: Enterprise Zone Local Development Order consultation**

Reading through the Revised Local Development Order and Environment Report, we understand that the area to be covered has increased. It is not clear from the documents how the original order and revised order compare in terms of phosphate and though it is stated that the revised order is still within the phosphate headroom, it should be made clearer why this is still the case.

Notwithstanding the above, your authority should be aware of a Ruling made recently by the Court of Justice of the European Union (the CJEU) on the interpretation of the Habitats Directive in the case of People Over Wind and Sweetman vs Coillte Teoranta (ref: C-323/17 ).

The case relates to the treatment of mitigation measures at the screening stage of a HRA when deciding whether an appropriate assessment of a plan/project is required. Competent authorities currently making HRAs should be mindful of this case and should seek their own legal advice on any implications of this recent ruling for their decisions.

Kind regards

Ms Gillian Driver  
Lead Adviser  
Planning for a Better Environment – West Midlands Team  
Natural England, Worcester County Hall, Spetchley Road, Worcester, WR5 2NP  
Direct Dial: 0208 02 60995 / 07771 844 523

Follow the West Midlands team on Twitter - **@NE WestMids**

**[www.gov.uk/natural-england](http://www.gov.uk/natural-england)**

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.



Our Ref: 07B805562  
Your Ref: EZO consultation

15<sup>th</sup> February 2019

Hereford EZO Consultation,  
Planning Services  
Herefordshire Council  
Plough Lane  
Hereford  
HR4 0EL

Via email: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

St Catherine's Court  
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T: +44 (0)8449 02 03 04  
F: +44 (0)117 988 5344

**[avisonyoung.co.uk](http://avisonyoung.co.uk)**

Dear Sir or Madam,

**Representations to Hereford Enterprise Zone Local Development Order 2019 consultation on behalf of New Model in Technology and Engineering (NMiTE) Consultation: 17 January to 15 February 2019**

This submission has been prepared by Avison Young on behalf of New Model in Technology and Engineering ('NMiTE') to make representations to the Hereford Enterprise Zone Local Development Order 2019, available for consultation until 15 February 2019.

NMiTE is an initiative backed by Government, educators and industry, to transform engineering education in the country. NMiTE will be located in Hereford and will ultimately become the first new UK university in 40 years. Launched in 2015 with the support of a strong coalition of leading universities, engineers, business people and MPs, the New Model in Technology and Engineering (NMiTE) offers a way for the country to address its shortfall of 40,000 engineering graduates. The university will make Herefordshire a more attractive place for young people to live and study, and will help to revitalise the county's economy by directly addressing a national and local knowledge and skills gap and ultimately creating a new pool of talented young professionals to tackle the engineering challenges of the future. The main university learning centres will be situated within Hereford with some teaching spaces provided within a 10-minute radius of the city centre, but NMiTE also has ambitious plans to deliver teaching space within the Enterprise Zone at Rotherwas.

This representation is therefore submitted in response to the current consultation on the Hereford (Rotherwas) Enterprise Zone Local Development Order (2019) ('LDO') consultation, which is a revision to the original Hereford LDO first adopted in April 2013 and subsequently updated in November 2014. We understand that following consultation, the Council may make modifications to the draft LDO and, in line with Regulation 38(5)(c) of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the local planning authority is required take account of all representations received during the consultation period. We therefore wish to make the following core representations on

Avison Young is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB

Regulated by RICS

behalf of NMiTE and we trust that they will be given due consideration prior to the decision to adopt the LDO:

- The Local Development Order (LDO) should be amended and updated to reflect the emerging higher education context for Hereford, which incorporates a new university being established by NMiTE. Specifically, we request that the LDO allows for an element of D1 Use Classes to be permitted;
- A meeting is requested to discuss the specific implications for the wording and objectives of the LDO.

### **Purpose of the Local Development Order**

The purpose of the Hereford LDO is to simplify planning procedures within the Enterprise Zone, saving time and reducing costs to business with the aim of attracting employment generating uses to Hereford Enterprise Zone. A key objective noted in the LDO is the creation of highly skilled jobs and encouragement of investment, together with an aspiration to develop a centre of excellence for the defence and security sector and other technologies (LDO para. 1.2).

The LDO provides for the following, subject to an application for determination of further details and conditions:

- *Granting developers planning permission subject to conditions for development within Classes B1, B2 and B8 of the Use Classes Order 1987 (as amended) where proposals comply with the principles for Hereford Enterprise Zone. This includes offices (not falling within Class A2), research and development, light industry, general industrial processes and storage and distribution uses.*
- *Removing the need to submit some information in relation to statutory environment provisions, flood and transport impact assessments in that these have been carried out for developments complying with the provisions of the LDO;*
- *Withdrawing the need to contribute towards necessary infrastructure set out within the Planning Obligations Supplementary Planning Document;*
- *Withdrawing the requirement to pay for pre-application advice for proposals complying with the LDO.*

We note that the current consultation on the LDO 2019 includes the following specific revisions and updates to the LDO adopted in 2014:

- Confirmation of the 5ha extension to the LDO boundary to the southwest adjacent to Rotherwas Access Road (consistent with the Core Strategy);
- Minor extension to the east;
- Inclusion of protected areas of archaeological sensitivity;
- Rolling the LDO forward for a further 5 years;
- Updates to relevant planning policies;
- Amendments to the wording of condition 8 (flood management measures) and condition 14 (sustainable design requirements).

It is evident that a core purpose and objective of the LDO is to encourage investment and economic growth alongside job retention and creation. NMiTE is wholly supportive of this objective and consider that such incentives committed through the LDO are fundamental to promoting economic growth and reducing uncertainty for investment in the city and region. We would, however, comment that, in the current context of national and local skills shortages for highly skilled jobs in technology and engineering, there is a missed opportunity to promote skills development through the currently drafted LDO that will in turn translates into a missed opportunity in terms of job creation, talent retention and attract business investment to Hereford.

## **The New Model for Higher Education – New Model in Technology and Engineering (NMiTE)**

NMiTE is seeking to establish a new university within Hereford, which will be an innovative higher education institution serving Herefordshire and the wider sub-regional area of the Marches Local Enterprise Partnership (LEP) and Midlands Engine. The organisation was launched in March 2015 with the core aim of providing a world-class engineering university in Herefordshire using new techniques and a new model of higher education, fit for the 21<sup>st</sup> Century. Engineering is a critical part of the UK economy through the sector's direct contributions to UK turnover and employment and the 'multiplier' effect<sup>1</sup> it generates. Jobs in engineering are wide ranging, comprising manufacturing, construction, infrastructure, information and communications as well as professional, services, scientific and technical activities. Overall, engineering makes a substantial contribution to the UK's total turnover (£1.23 trillion/21.4% for 2017-2018)<sup>2</sup>.

In March 2017, NMiTE was awarded £8 million of funding from the Marches Local Enterprise Partnership followed by the announcement of a grant of circa £15 million by the Department for Education in October 2017. Buoyed by these commitments, NMiTE has now made substantial progress in developing the academic programme; NMiTE has already started to deliver a programme of teaching known as 'Ingenuity Studio' and is currently testing, building and designing the new university model. From campus layout to student accommodation to curriculum design, a range of individuals are working as part of a 'Design Cohort' to deliver this exciting vision. NMiTE is targeting to open its doors to 350 fee paying students in September 2020 with the aim to grow to 5,000 students over 10 to 15 years.

At a local level, NMiTE's interest in Hereford emerged from recognition that Herefordshire is one of only three English counties without a university and the region is a known higher education 'cold-spot'. Nationally, a shortfall of individuals with sufficient science, technology and engineering skills is a considerable challenge that business is facing, which is mirrored at a local level. In this context, the presence of a world-class learning institute offers significant economic opportunities and benefits for young people to develop crucial engineering and technology skills that will contribute to local and regional economic growth. The retention and nurture of talent, coupled with the partnerships created between the university and national and local engineering businesses will establish a strong foundation to realise significant economic benefits for the city and contribute to the Council and LEP's growth objectives.

The university is a not for profit institution and is not reliant in the long term on Government funding. Key features of the new model include a 50:50 gender balanced and diverse student body and faculty; collaboration with industry on curriculum design and provision of real problems for classroom; interdisciplinary and problem-based/learning-by-doing providing students with high value for money; applied work experience; embedded lifelong learning skills, with enhanced innovation, design and creativity capabilities and community based projects providing technological solutions for local not-for-profit organisations. The curriculum is intended to include a format of 20-week assessed internship, 20-week consultancy project with students then being able to complete a MEng degree in three 46-week years or a BEng degree in two years. The university will therefore require a mix of teaching/student-learning spaces that could be directly linked to specific employer partners that can deliver the unique features of this offering.

Critical to this model will be partnerships with employers and organisations that have the need for a practically skilled workforce. This will have benefits for both students, who will live and contribute to the local economy in Hereford, and employers as follows:

- Students will have the opportunity to widen and develop engineering and technology skills and learning whilst gaining valuable work experience that means they are 'workplace ready' as soon as they graduate;

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<sup>1</sup> Source: Engineering UK 2018 Synopsis and Recommendations

<sup>2</sup> Source: Office of National Statistics data: Engineering industry in the UK, 5 December 2018

- Students will develop characteristics that ensure employability and create a sense of ownership and certainty for their future career progression;
- Employers will have the opportunity to work with NMiTE to tailor a curriculum that suits the changing needs of the engineering sector;
- Business will be able to work with ambitious, creative and enthusiastic young engineers that are investing in their future employment through this new model of learning;
- Employers will benefit from a pool of highly skilled graduates that will have strong work experience as soon as they leave university, saving costs on recruitment and training in the first years of employment.

Importantly, the provision of a world-class institution will put Hereford 'on the map' at an international level and NMiTE is already talking to large multi-national employers about partnership opportunities and the university will act as a catalyst to encourage international business to invest in the city. This is directly relevant in the context of the LDO, which encourages investment from overseas.

At a strategic level, NMiTE will be working closely with their employer partners to educate and develop young engineering talent with the right skills for a career in the industry. This means that there will be a need for business and teaching spaces to be co-located and for learning and development to take place in proximity to employer partners. NMiTE is, therefore, keen to ensure that defined employment floorspace within the city has the flexibility to facilitate an education or teaching space that encourages this symbiosis.

Given the significant social and economic benefits this will bring to the region, it is now an opportune moment for NMiTE's future growth to be firmly established within the spatial and planning framework for Herefordshire. In light of the current consultation opportunity on the Hereford LDO, this representation seeks additional changes to be made to the LDO to reflect NMiTE's growth potential and the mutual benefits that this offers for skills development and job creation. As such, we request that the LDO is updated further to reflect this changing education context and emerging industry requirements. The LDO should allow flexibility for NMiTE to achieve the aims and objectives of this new university, which includes partnership with employers as a fundamental pillar for the new model of teaching. The approach will have wide ranging benefits for not only the Enterprise Zone but also Hereford's role in the economy of the region.

### **Recommended Changes to the LDO**

As set out above, we seek for the LDO to be updated to reflect the new higher education provision coming forward in Hereford over the next 5 years. This proposition represents a considerable economic shift that needs to be reflected in the future spatial plans to capture the economic benefits for the Hereford Enterprise Zone. We consider that it is important for the LDO to acknowledge the opportunity through changes that focus on business investment but also ensure appropriate provision of facilities for a higher education institution that will have a fundamental economic impact on the region.

The economic benefits resulting from the development of a highly skilled, local workforce with strong work experience relate directly to the objectives of the LDO, which promotes job creation and business investment. In particular, the LDO aspires to create a centre of excellence for the defence and security sector with additional employment hubs focussed on advanced technologies, environmental technologies and food and drink technologies, all of which require specialised engineering and technology knowledge and skills. In the context of the higher education 'cold-spot' in Herefordshire, it will be a challenge to ensure that Herefordshire labour market can match the growth of the Enterprise Zone without the right educational pathways to encourage young people in Hereford or from elsewhere to move or stay in Herefordshire to realise their true potential. We consider that in order to comprehensively address the engineering skills shortage, a holistic view of an individual's education, employment and career experience is needed from a young age to ignite passion and enthusiasm in the sector and nurture talent. In our view, this cannot be created through promoting business investment alone; it must be in tandem with promoting education and learning

to develop the skills needed and attract and retain a highly skilled workforce living and working in the area.

Specifically, we seek revisions to the LDO to allow for an element of D1 use class that will provide greater flexibility for NMiTE's employer partners to offer premises that can accommodate the university's activities over the next 5 years. This will allow for the university to achieve its learning and economic objectives without the risk of planning delay and uncertainty, providing greater choice in location for business and education investment to align within the new university model.

NMiTE has the support of the Council and LEP and view this consultation as an opportunity for collaboration with Herefordshire Council's Planning team to explore the exciting ways that this new model will benefit the city at a strategic level. We would therefore welcome a meeting to discuss and review how the specific wording of the LDO can be amended to provide mutual benefits for NMiTE, the Council and future employers. Our initial thoughts are set out below, however, we would welcome a further discussion to review the overall approach within the LDO.

### **Suggested Amendments**

The suggested amendments to the wording of the LDO are bolded below. We consider that the change to allow for some D1 use within the LDO continues to meet the objectives for economic growth and can be achieved without amendment to the environmental parameters.

"2      *Hereford Local Development Order (Hereford LDO)*

*Development comprising the erection of buildings, related external plant, machinery or apparatus, provision of access to and use of land falling within Classes B1, B2, ~~and B8~~ **and D1** of the Use Classes Order 1987 on land within the Hereford Enterprise Zone LDO area (see land outlined and edged in red at Appendix A) is permitted..."*

Given the nature of the new model of teaching and employment, there will be significant amount of laboratory based work with innovation spaces and workshops linked with particular projects/apprenticeships, funded by technology and engineering companies. The majority of learning undertaken in this environment will therefore be project based with students working in the same spaces as engineering employees. This would therefore fall within Use Class B1(b) and we seek for clarity in the wording of the LDO that this would be the Council's interpretation. This is a similar approach to current proposals for an Institute of Advanced Automotive Propulsions Systems at the Bristol and Bath Science Park on behalf of the University of Bath (defined within Use Class B1(b)) and planning permission for purpose built research facilities (falling within Use Class B1(b)) at Begbroke Science Park on behalf of the University of Oxford. We therefore seek for the LDO wording to be amended as follows and would welcome a meeting to discuss further input into the LDO:

"3.9      *The LDO provides for the following:*

- *Granting developers planning permission subject to conditions for development within Classes B1, B2, ~~and B8~~ **and D1** of the Use Classes Order 1987 (as amended) where proposals comply with the principles for Hereford Enterprise Zone. This includes offices (not falling within Class A2), research and development (**including teaching laboratory space for engineering research and development**), light industry, general industrial processes and storage and distribution uses.*
- *Removing the need to submit some information in relation to statutory environment provisions, flood and transport impact assessments in that these have been carried out for developments complying with the provisions of the LDO;*
- *Withdrawing the need to contribute towards necessary infrastructure set out within the Planning Obligations Supplementary Planning Document;*
- *Withdrawing the requirement to pay for pre-application advice for proposals complying with the LDO"*

## Conclusions

This representation has been prepared by Avison Young on behalf of NMiTE in response to the current consultation on the Hereford Enterprise Zone Local Development Order 2019. We consider that amendments to the LDO will secure the following key economic benefits:

- Allows for employment and teaching spaces to be co-located through partnership, providing mutual benefits for industry and the workforce;
- Attracts overseas investment into the Enterprise Zone from international employer partners seeking to work with NMiTE to develop suitable academic and practical engineering programmes for a new generation of multi-disciplinary engineers;
- Encourages new people to move to Hereford to be educated at NMiTE, providing a highly skilled labour market to fill a current skills gap and work for businesses in the Enterprise Zone;
- Raises Hereford's reputation as a progressive city for education and employment, highlighting the Enterprise Zone as a core location for investment;
- Provides an education programme that is directly linked to the target sectors and industries for growth within the Enterprise Zone.

In summary, we support the LDO objective for employment and job creation but we consider that this could go further to reflect the emergence of a new university in Hereford that is focused on a unique approach to education and learning. We hope that this representation will be taken into account as part of the Council's consideration of any amendments to the LDO prior to a decision to adopt.

Please do not hesitate to contact me on 0117 988 5356 / [sally.davis@avisonyoung.com](mailto:sally.davis@avisonyoung.com) should you wish to discuss the content of this letter in further detail.

Yours faithfully

**Sally Davis**  
**Associate**  
**0117 988 5356**  
**[sally.davis@avisonyoung.com](mailto:sally.davis@avisonyoung.com)**  
**For and on behalf of GVA Grimley Limited t/a Avison Young**

Richard and Julia Gibson



17<sup>th</sup> February 2019

Herefordshire Council  
Hereford EZO Consultation  
Planning Services  
Herefordshire Council  
Plough Lane  
Hereford  
HR4 0EL

BY EMAIL [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

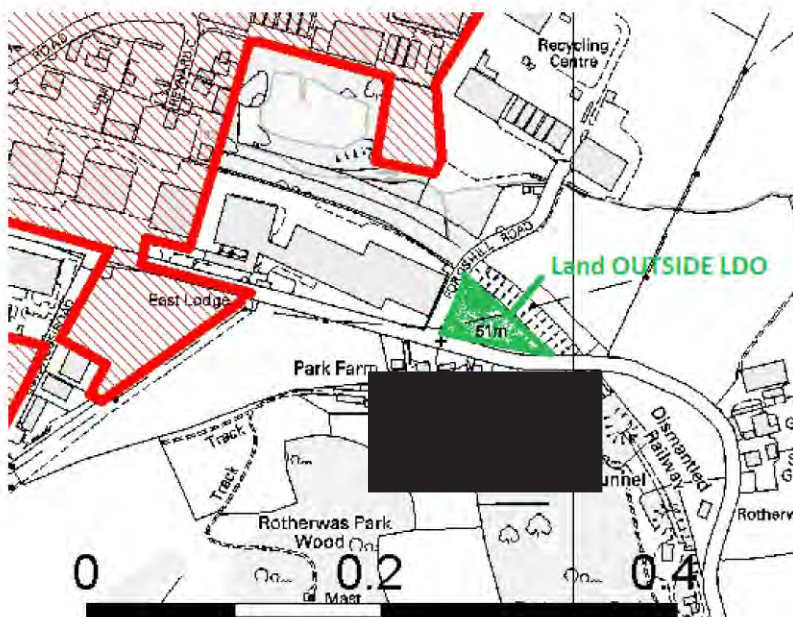
Dear Sir

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015  
NOTICE UNDER ARTICLE 38 OF PROPOSAL FOR LOCAL DEVELOPMENT ORDER GRANTING PLANNING  
PERMISSION  
PROPOSED DEVELOPMENT AT HEREFORD ENTERPRISE ZONE**

Please accept this letter as a formal objection to the proposed amendments.

I moved to this property on 30<sup>th</sup> November 2018.

As part of my decision to move to Hereford extensive searches of all planning records were made and, having satisfied myself with my solicitor that the area of land directly opposite the house fell outside the Local Development Order for the area I was happy to accept living close to the employment area.





I now see that the triangle of land opposite is to be considered as part of the employment area and subject to preference by your council for development.



This is the only piece of land directly opposite a number of dwellings on Rotherwas and, if built upon, will have a significant impact on the enjoyment of the property, the aspect from the front of the dwelling and, consequently, values.

We are extremely surprised and particularly upset that we might find ourselves directly opposite future development on a small area of land which adds little to the overall development at Rotherwas and has a large impact on those Council Tax payers living here.

The old railway embankment is, together with the former bridge buttresses on Holme Lacey Road, a major piece of local industrial heritage, evidenced by the positioning of the ex-army train on the entrance to Fordshill Road. It is a clear reminder from the road of the history of this area. Any development will obscure the embankment from the road and thus lessen its reference with the community. This goes against Rotherwas's clear policy of engagement seen by the striking artwork on the Straight Mile to the legacy of the "Women of Rotherwas".

I look forward to discussing this further with your officers and trust that the benefit to the taxpayers living here will be given as much weight to any anonymous developer of this small piece of land.

Yours faithfully

Richard E Gibson

## Latham, James

---

**From:** Idf  
**Sent:** 11 February 2019 08:20  
**To:** Gilson, Susannah  
**Subject:** FW: Response to HEZ LDO consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Comments on the LDO attached.

Regards

Kev

---

**From:** Robert Palgrave  
**Sent:** 09 February 2019 17:28  
**To:** Idf <ldf@herefordshire.gov.uk>  
**Subject:** Response to HEZ LDO consultation

I have two comments to make

1. Why not require new buildings to achieve a BREEAM rating of Excellent instead of Very Good? Developers benefit from a streamlined and cheaper planning process, can we not expect buildings with higher energy and water efficiency in return? And why not require all new buildings to be fitted with solar panels?
2. How can the cap on vehicle trip numbers be justified when other developments that increase traffic levels on the A49, like the Old Market and ASDA petrol station were not similarly constrained?

regards

Robert Palgrave

## Latham, James

---

**From:** Planning Central <Planning.Central@sportengland.org>  
**Sent:** 18 January 2019 09:47  
**To:** Gilson, Susannah  
**Subject:** RE: Enterprise Zone Local Development Order consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Thank you for consulting Sport England on the above application.

The proposed development does not fall within either our statutory remit (Statutory Instrument 2015/595), or non-statutory remit (National Planning Policy Guidance (PPG) Par. 003 Ref. ID: 37-003-20140306), therefore Sport England has not provided a detailed response in this case, but would wish to give the following advice to aid the assessment of this application.

General guidance and advice can however be found on our website:

[www.sportengland.org/planningapplications](http://www.sportengland.org/planningapplications)

If the proposal involves the loss of any sports facility then full consideration should be given to whether the proposal meets Par. 97 of National Planning Policy Framework (NPPF), link below, is in accordance with local policies to protect social infrastructure and any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.

If the proposal involves the provision of a new sports facility, then consideration should be given to the recommendations and priorities set out in any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority may have in place. In addition, to ensure they are fit for purpose, such facilities should be designed in accordance with Sport England, or the relevant National Governing Body, design guidance notes: <http://sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

If the proposal involves the provision of additional housing ( then it will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then new and/or improved sports facilities should be secured and delivered in accordance with any approved local policy for social infrastructure, and priorities set out in any Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and PPG (Health and wellbeing section), consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing or assessing a proposal. Active Design provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

Planning Admin Team

T: 020 7273 1777

E: [Planning.central@sportengland.org](mailto:Planning.central@sportengland.org)



#FITGOTREAL



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



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**From:** Gilson, Susannah <[Susannah.Gilson@herefordshire.gov.uk](mailto:Susannah.Gilson@herefordshire.gov.uk)>

**Sent:** 17 January 2019 10:58

**To:** Planning South <[Planning.South@sportengland.org](mailto:Planning.South@sportengland.org)>

**Subject:** Enterprise Zone Local Development Order consultation

**Town and Country Planning (Development Management Procedure) (England) Order 2015. Notice under Article 38 of proposal for Local Development Order Granting Planning Permission. Proposed development at Hereford Enterprise Zone, Rotherwas**

I give notice that the County of Herefordshire District Council (Herefordshire Council) proposes to make a Local Development Order granting planning permission for development falling within Class B of the Town and Country Planning (Use Classes) (Amendment) Order 2010.

A copy of the draft revised order with statement of the Council's reasons for making the order are available for inspection at:

- Hereford Customer Services, Blueschool House, Blueschool Street, Hereford
- Hereford Library, Broad Street, Hereford
- Herefordshire Council Offices, Plough Lane, Hereford

To view the document online or for further information, please visit:

[www.herefordshire.gov.uk/HEZ-LDO](http://www.herefordshire.gov.uk/HEZ-LDO)

If you have any questions, please contact 01432 383357 or email the address below.

Anyone wishing to make representations about the proposed local development order should write to the Council at Hereford EZO Consultation, Planning Services, Herefordshire Council, Plough Lane, Hereford, HR4 0EL or via email to [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

**Comments must be received by Friday 15 February 2019**

Yours Sincerely

## Latham, James

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**From:** ldf  
**Sent:** 14 February 2019 09:12  
**To:** Gilson, Susannah  
**Subject:** FW: Woodland Trust comments on the Hereford Enterprise Zone Local Development Order consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Susi

LDO comment attached.

Regards

Kev

---

**From:** campaigning@woodlandtrust.org.uk <campaigning@woodlandtrust.org.uk>  
**Sent:** 13 February 2019 16:01  
**To:** ldf <ldf@herefordshire.gov.uk>  
**Cc:** campaigning@woodlandtrust.org.uk  
**Subject:** Woodland Trust comments on the Hereford Enterprise Zone Local Development Order consultation

Dear Sir/Madam,

Thank you for the opportunity to provide comment on the above consultation.

The Woodland Trust would like to highlight the presence of a veteran wild black poplar recorded on the Ancient Tree Inventory (tree number: 145614, at grid reference: SO5239037676) which is within the proposed Local Development Order boundary. For any subsequent planning application submitted as part of this development, the Trust asks that the veteran tree - and any other trees displaying veteran characteristics – is incorporated into the design, and provided with a root protection area of 15x the diameter or 5m beyond the canopy (whichever is greater) in line with [Natural England's Standing Advice](#) and the National Planning Policy Framework.

We hope our comments are of use to you, if you would like to discuss anything further please do not hesitate to get in touch.

Kind regards,  
Nicole Hillier

**Nicole Hillier**  
Campaigner - Ancient Woodland

Telephone: 03437705438  
Email: [NicoleHillier@woodlandtrust.org.uk](mailto:NicoleHillier@woodlandtrust.org.uk)

Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL  
0330 333 3300  
[www.woodlandtrust.org.uk](http://www.woodlandtrust.org.uk)

Cases involving woods and trees under threat can change and evolve during the planning process due to a wide variety of reasons. Where a development involving ancient woods or veteran trees no longer remains a threat

## Latham, James

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**From:** Bloxsome, Bill  
**Sent:** 11 February 2019 11:28  
**To:** Gilson, Susannah  
**Subject:** FW: Eastside - Land to East of Fordshill Road - Revised Local Development Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Suzi,

Another to add to the consultation list.

Bill

---

**From:** Pearce, Mark <[mark@skylonpark.co.uk](mailto:mark@skylonpark.co.uk)>  
**Sent:** 05 February 2019 19:17  
**To:** Bloxsome, Bill <[Bill.Bloxsome@herefordshire.gov.uk](mailto:Bill.Bloxsome@herefordshire.gov.uk)>  
**Subject:** RE: Eastside - Land to East of Fordshill Road - Revised Local Development Plan

yes

---

**From:** Bloxsome, Bill <[Bill.Bloxsome@herefordshire.gov.uk](mailto:Bill.Bloxsome@herefordshire.gov.uk)>  
**Sent:** 05 February 2019 14:24  
**To:** Pearce, Mark <[mark@skylonpark.co.uk](mailto:mark@skylonpark.co.uk)>  
**Subject:** RE: Eastside - Land to East of Fordshill Road - Revised Local Development Plan

Thanks Mark,

I assume this is the area that was shown previously as open space in the UDP?

Bill

---

**From:** Pearce, Mark  
**Sent:** 05 February 2019 12:20  
**To:** Bloxsome, Bill  
**Subject:** FW: Eastside - Land to East of Fordshill Road - Revised Local Development Plan

As discussed

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**From:** Andrew Howell <[andrew@wyevalleygroup.co.uk](mailto:andrew@wyevalleygroup.co.uk)>  
**Sent:** 05 February 2019 08:42  
**To:** Pearce, Mark <[mark@skylonpark.co.uk](mailto:mark@skylonpark.co.uk)>  
**Subject:** Eastside - Land to East of Fordshill Road - Revised Local Development Plan

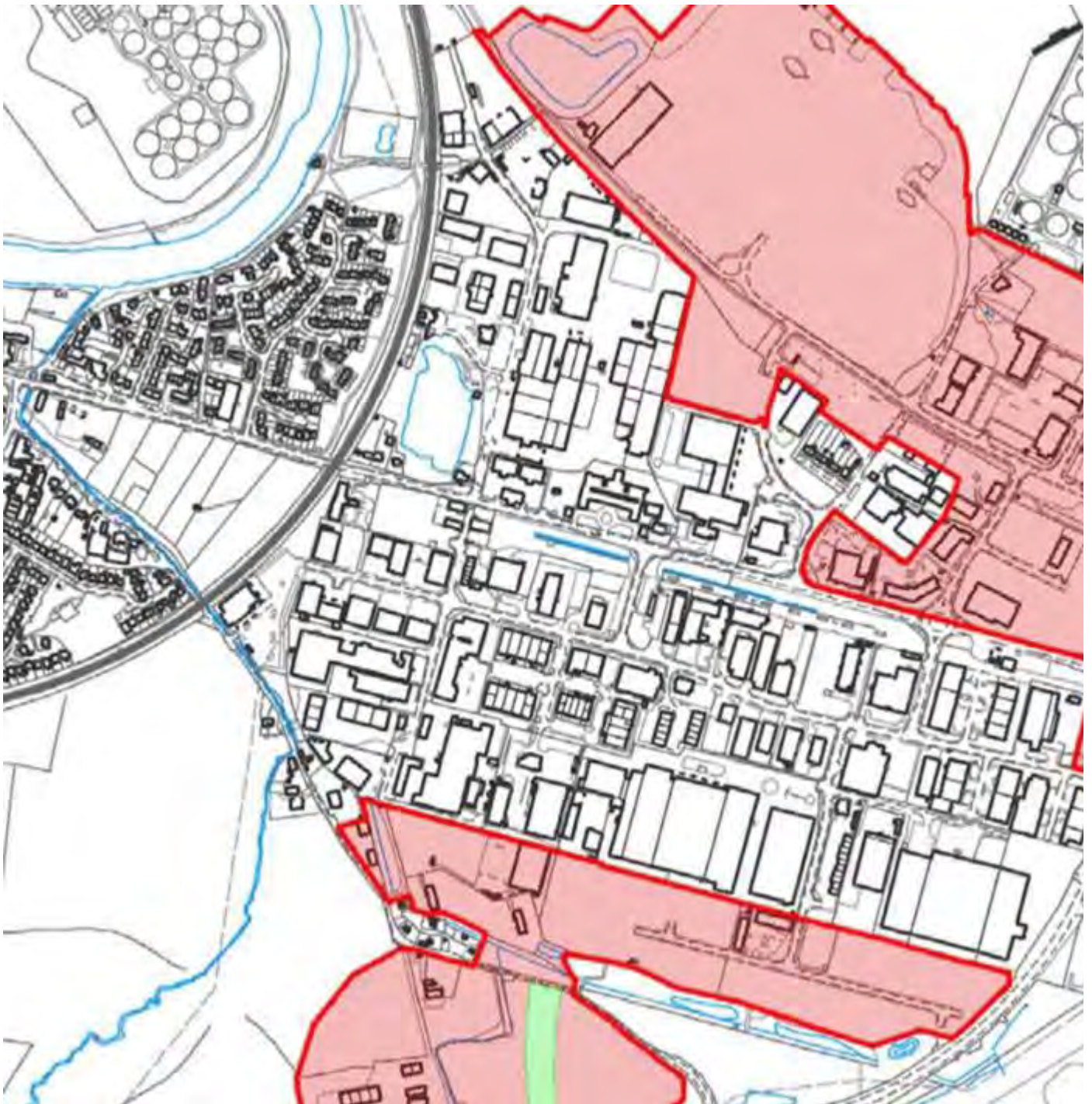
Hello Mark

Please accept this email as confirmation that we would like to see the land to the south-east corner of our ownership, east of Fordshill Road, included within the LDO.

Should you require any further information then please do not hesitate to contact me.

Regards

Andrew



**Andrew Howell**  
Wye Valley Group  
Lloyd George House  
Fordshill Road  
Rotherwas Industrial Estate  
Hereford  
HR2 6NS

[www.wyevalleygroup.co.uk](http://www.wyevalleygroup.co.uk)

Please consider the environment  
before printing this email

**From:** Andrew Howell <[andrew@wyevalleygroup.co.uk](mailto:andrew@wyevalleygroup.co.uk)>  
**Sent:** 30 January 2019 13:34  
**To:** Pearce, Mark <[mark@skylonpark.co.uk](mailto:mark@skylonpark.co.uk)>  
**Subject:** Surveyor & LDO

Hello Mark

Re the LDO ?, it would appear that the paddock fronting the Holme Lacy Rd is zoned as open space!! see attached, out of interest this is 2007 could this have been amended as I am sure it was zoned B2/B8

Regards

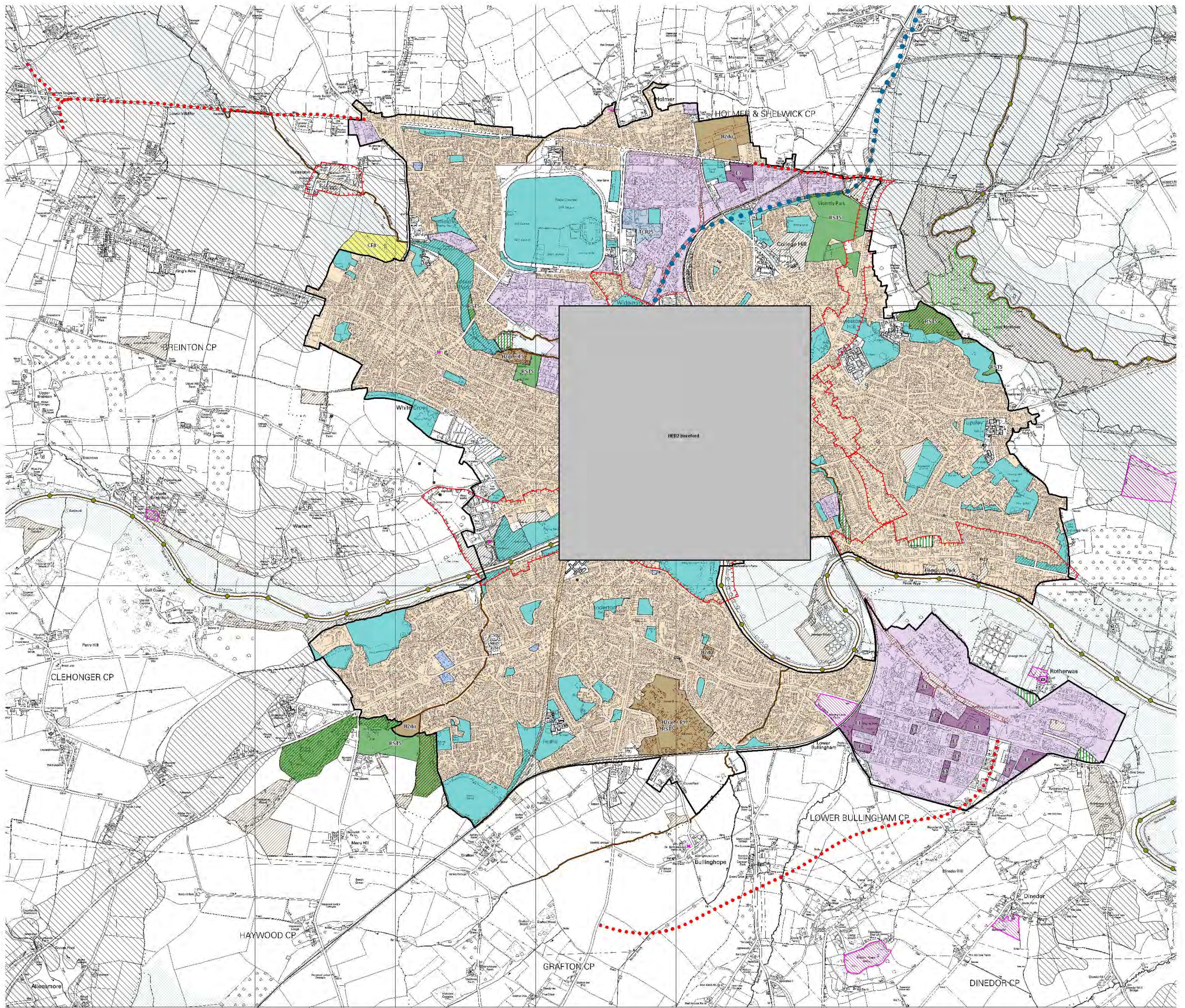
Andrew

**Andrew Howell**  
Wye Valley Group  
Lloyd George House  
Fordshill Road  
Rotherwas Industrial Estate  
Hereford  
HR2 6NS

[www.wyevalleygroup.co.uk](http://www.wyevalleygroup.co.uk)

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<ul style="list-style-type: none"> <li> Area Liable to Flood (CRT)</li> <li> Settlement Boundary (H1)</li> <li> Established Residential Area (H1)</li> <li> Proposed Housing Site (H2)</li> <li> Employment Proposal (E1, E3)</li> <li> Safeguarding Employment Land (E5)</li> <li> Town Centre Proposal (TCR25)</li> <li> Local Shopping Centre (TCR13)</li> </ul>	<ul style="list-style-type: none"> <li> Safeguarding Mineral Reserves (M5)</li> <li> Rail Freight (T4)</li> <li> Safeguarding Road Scheme (T10)</li> <li> Site of Special Scientific Interest (SSSI) (NC4)</li> <li> Special Wildlife Site (SWS), Site of Interest for Nature Conservation (SINC), Section 39, (NC4)</li> <li> Local Nature Reserve (LNR) (NC4)</li> </ul>	<ul style="list-style-type: none"> <li> Conservation Area (HEA6)</li> <li> Protection of Open Areas and Green Spaces (HEA8)</li> <li> Scheduled Ancient Monument (SAM) (ARCH3)</li> <li> Proposed Open Space (RST5)</li> <li> Safeguarding Open Space Allocations (RST4)</li> <li> Hereford and Gloucester Canal (RS19)</li> </ul>	<p><b>Inset Map HER1 Hereford City</b></p> <p>Herefordshire Unitary Development Plan</p> <p>March 2007</p> <p>Scale 1: 10 000</p> <p>North</p> <p>The Written Statement contains general policies relating to the area covered by the plan</p> <p><small>Reproduced from Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office. Crown Copyright Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. 100024169 2007</small></p>
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