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288/1104/012/RT/fj/4a
19th September 2014

FAO: J Reeves
Senior Planner
Strategic Planning
Herefordshire Council
Planning Department
Blueschool House
Hereford
HR1 2ZB

Dear Jane,

**Re: Herefordshire Core Strategy: Employment level strategy.
Land to the south of Little Marcle road**

We write on behalf of our client, Heineken UK as owners of the land adjacent to the potential employment land site identified in the core strategy noted above.

Heineken would re: confirm their on-going support for the proposed strategy for this land to be allocated for future employment use and confirm the matters raised in Montagu Evans letter 28.11.11 (attached) still stand. As HDC will be aware, Heineken have also submitted a pre-application enquiry for employment use with the intention to subsequently make an outline planning application in the near future.

We trust this is satisfactory.

Yours faithfully

RICHARD TOWNEND
For and on behalf of GWP Architecture

Encls

Cc: Lynne Winter- Heineken (UK) +encls
File + encls

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28 November 2011

Local Development Framework
Number - RRJX-TLSH-SCYH
Freepost - Forward Planning
Herefordshire Council
PO Box 4
Plough Lane
Hereford
HR4 0XH

Submitted by post and email: ldf@herefordshire.gov.uk

Dear Sir or Madam,

HEREFORDSHIRE COUNCIL LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY REVISED PREFERRED OPTIONS CONSULTATION

On behalf of our Client, Heineken (UK) Ltd, we submit representations to the Revised Preferred Options draft of the Herefordshire Council LDF Core Strategy in respect of the Universal Beverages (UB) site in Ledbury.

Background

Our client owns the 20 ha (49.42 acres) brewery site on Little Marcle Road, to the west of the settlement of Ledbury. The site was previously used for jam production by Robertsons, and has always been a key employment location within Herefordshire. Of the 20 acre site, 9.1 ha (22.5 acres) have been developed for uses relating to the brewery, with the remainder of the site left as undesignated Greenfield land which is predominately used for agricultural purposes.

The brewery site produces and packages a range of International, National and Regional beverage products for a range of drinks producers. The fruit milling facility can process over 15,000 tonnes of produce every week, and is a major employer within the town.

The UB facility represents a significant contributor to the local economy as a key employer in the local area, and wishes to ensure that its long-term position within Herefordshire is maintained through the ability to protect and enhance its operation.

Emerging Core Strategy

Given the significance of the facility in the local area, our client seeks to confirm this status within the Council's Core Strategy. This relates to the agricultural land neighbouring the UB site, and the opportunity to bring such land into employment use in order to facilitate the expansion of UB and its operations to meet both identified and future needs. Indeed this would help secure the presence of UB in the area and prevent the business having to consider relocation due to land restrictions. In a wider sense it will support and promote the future of Ledbury's economic employment status.

Draft Preferred Options: Bromward, Ledbury, Ross-on-Wye (July 2010)

Although the Draft Options Consultation has closed and the subsequent Revised Preferred Options Consultation is currently underway, it remains beneficial to highlight those points of the Draft Preferred Options which set out the Council's vision for how Ledbury should develop.

Section 3 of the 'Draft Preferred Options: Bromyard, Ledbury, Ross-on-Wye' states that:

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"The preferred strategy for Ledbury is to promote its role as a multi-functioning centre for its own population and that of its rural hinterland. The strategy seeks to promote the continued development of the town, taking into consideration its needs, opportunities and constraints."

We agree with this vision, especially with the promotion of continued development of Ledbury which will allow it to support its population and enable its future success as a market town. It is also right to emphasise the importance of building and maintaining Ledbury as a 'multi-functioning centre'.

Section 3.1 of the Draft Preferred Options identified Ledbury as having the highest level of commuter workers in the county:

"Workers are more likely than those in any other town in the county to commute over 6 miles. Over 40% of its 16-74 year olds in employment are commuting more than 10km to get to work."

This is not a sustainable situation, and opportunities must be created in order to retain this workforce. We therefore endorse the approach set out within this draft of the Core Strategy for identifying new employment allocations in Ledbury.

With regard to the supply of employment land, Section 3.0 Draft Policy proposes:

"The provision for 12 ha of new employment land between the Little Marcle Road and the Ross Road to the west of the bypass to counter people travelling long distances for work and support economic regeneration."

We are in full support of this allocation as it will enable the expansion of established employers in this location, such as Universal Beverages Ltd, as well as encouraging new employers into the area. Subsequently this will create more jobs, in turn tackling the issue of workers commuting away from Ledbury which will help to retain the workforce and support the sustainable growth of the town. Therefore we fully endorse the attached 'Preferred Option Ledbury' map contained in the Draft Preferred Options document because its 'employment growth' allocation allows this expansion to take place.

Section 3.2 explains the preferred strategy. It reads:

"Concentrating housing development to the Viaduct site and employment development to the land south of Little Marcle Road allows for not only economies of scale but constrains development to land considered of low-medium sensitivity in landscape terms. This option renders unnecessary the need to develop land to the west and south of the bypass on land of higher sensitivity in landscape and other environmental terms (including agricultural value, biodiversity interest and historical landscape interest)."

Further, Section 3.2 concluded that using land to the south of the bypass as for employment only was:

"not considered a reasonable option because the landscape in this area is visually very open and gently rising and large industrial buildings here would appear an obtrusive feature in the landscape from all directions of approach."

We agree with the proposition of intensifying employment in the area south of Little Marcle Road and the subsequent benefits which could result from such agglomeration. We also agree that this 'renders unnecessary' the need to further develop south and west of the bypass. This area is considered to be of a higher sensitivity than the already identified 'employment growth' area adjacent to the existing UB site. For this reason the 'employment growth' location is significant in protecting these environmentally sensitive areas where employment development would be inappropriate. Additionally, as our client is local landowner, there can be a degree of certainty over its deliverability, thus ensuring that this allocation can be successfully brought forward.

Section 3.0 states that:

"Jobs in utilities and manufacturing industries are over-represented in Ledbury."

It goes on to suggest that Ledbury's economic situation is vulnerable to future change as a result of its ageing population and its economic dependence on manufacturing. The expansion of the UB facility constitutes increased employment creating a diverse range of jobs. Breweries, as well as wider industrial uses, are beneficial for the local economy because they not only provide entry level jobs but are also able to shift working patterns to suit individual needs. In addition they are relatively less sensitive than other employment industries to economic conditions and are able to support other industries during a recessionary market. This builds the case for ensuring designated 'employment growth' areas are adopted into Core Strategy Policy. This is in line with Section 3.0 which states that:

"The Core Strategy and subsequent Market Towns and Rural Areas Plan will seek to ensure that opportunities exist to enable and promote the growth of a diverse range of employment opportunities in the town and ensure sufficient service provision."

We support this intention going forward in the preparation of the MTRAP document.

Revised Preferred Options (October 2011)

It is unclear whether the above suggestions/policies are to be included in the Revised Preferred Options draft of the Core Strategy, or whether they have been superseded. We are under the impression that the Revised Preferred Options document amends the contents of the Preferred Options; therefore it does not supersede it. It is our opinion that the above should be included within the Core Strategy to inform the pending MTRAP document, and the situation needs to be made clearer.

Section 7.1 of the Revised Preferred Options states that an Employment Land Provision Background Paper found a 5-year minimum reservoir requirement of 37ha of employment land and an indicative long term requirement of 148ha (2006-26).

Section 7.5 indicates that Herefordshire Council's Employment Land Study identified that despite a good supply of employment land, which is skewed towards manufacturing and industrial type uses such as Breweries, the sector is expected to decline in the amount of land it occupies over the study period. The projection of past completion rates predicts an undersupply in employment land for the county. It is therefore important to ensure that employers looking to expand their employment floor space should, within reason, be encouraged and able to do so. It concludes that:

"Supply in certain parts of the county would benefit from increases in the quality and quantity of employment land opportunities."

We are in full agreement of this statement to support the future of the local economy of Ledbury and indeed enable their own site expansion. Furthermore, Section 7.6 concluded that the Employment Land Study recommended:

*"Retaining existing UDP allocations, commitments and established employment sites ranked as Best or Good through the Development Plan process;
Enhancing the supply of land and opportunities for new employment development, and addressing spatial and qualitative deficiencies in supply within certain parts of Herefordshire; and
Consideration of a range of enhancement measures for certain sites to improve the employment portfolio."*

The recommendation of retaining established employment areas and following this, to be able to enhance the employment ability of such sites (point three), is supported.

Summary and Conclusions

In summary, it is understood that there is a need for the Council to allocate additional land for employment purposes to ensure that there is a sustainable supply of sites over the plan period to ensure that businesses can grow and expand.

This is particularly relevant for Ledbury, which requires a diversification in its industry to ensure that it remains economically sound and to reduce the number of firms who may have to relocate due to the lack of available space.

The 2010 preferred options identified land to the west of Ledbury adjacent to the UB sites which would be suitable for an employment allocation and would foster a new employment hub. We support the allocation in this draft of the document and the overarching aims which it seeks to deliver within Herefordshire.

However, the 2011 Revised Preferred Options appears to have been simplified, with this allocation no longer being included for Ledbury.

Whilst we support the aims of the Revised Core Strategy, we believe that the Core Strategy is the correct place to allocate strategic sites for employment purposes and, to be sound, it should include the employment allocation for Ledbury.

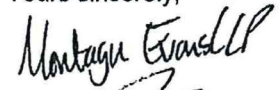
It is important to note that as one of the local landowners, we can confirm that there can be certainty of the deliverability of this site if allocated for employment use. We therefore propose that the allocation in the 2010 Preferred Options draft is reinstated and supported by the further work undertaken by the Council in the Revised Core Strategy.

We trust that the enclosed is in order; however, we would be very happy to answer any queries you may have regarding the Universal Beverages site or meet with you to discuss this in further detail.

We would also like to be registered on the Council's database for notifications of consultation and subsequent LDF documents and to reserve the ability to attend the Examination in Public of the Core Strategy.

Should you wish to meet to discuss the site in further detail or if you require any further information, please do not hesitate in contacting Jon Bradburn (020 7312 7452 / jon.bradburn@montagu-evans.co.uk) or Elena Walker (020 7312 7405 / elena.walker@montagu-evans.co.uk).

Yours sincerely,


MONTAGU EVANS LLP

cc. by email	L. Winter	:	Heineken (UK) Ltd
	J. Gilbert	:	Heineken (UK) Ltd
	A. Spencer.	:	Universal Beverages Ltd

 Herefordshire Local Plan Core Strategy

From John Goodwin FRICS - Margaret Smith **Date** 19 September 2014 12:45:38
To Reeves, Jane
Cc
Subject Herefordshire Local Plan Core Strategy

Dear Jane

I thank you for your emails and I note the enquiry relating to the land south of Little Marcle Road. I believe the land you refer to belongs to my clients Mr & Mrs A R Young of Hill House Farm, Ross Road, Ledbury. I have consulted them with regard to the suggested development proposals relating to the land for future employment use and I can confirm on their behalf that they have no objections to the proposal.

I trust this is sufficient for your purposes at this stage.

With best wishes.

John Goodwin

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