

<b>MEETING:</b>	<b>PLANNING COMMITTEE</b>
<b>DATE:</b>	<b>14 MARCH 2012</b>
<b>TITLE OF REPORT:</b>	<p><b>S113131/F - ERECTION OF RETIREMENT LIVING HOUSING FOR THE ELDERLY, (CATEGORY II TYPE ACCOMMODATION), COMMUNAL FACILITIES, LANDSCAPING AND CAR PARKING AT VICTORIA HOUSE, 149-153 EIGN STREET, HEREFORD, HR4 0AN</b></p> <p><b>S113132/C - ERECTION OF RETIREMENT LIVING HOUSING FOR THE ELDERLY, (CATEGORY II TYPE ACCOMMODATION), COMMUNAL FACILITIES, LANDSCAPING AND CAR PARKING AT VICTORIA HOUSE, 149-153 EIGN STREET, HEREFORD, HR4 0AN</b></p> <p><b>For: McCarthy &amp; Stone Retirement Lifestyles Ltd per The Planning Bureau Ltd, Hartington House, Hartington Road, Altrincham, Cheshire, WA14 5LX</b></p>

**Date Received: 7 November 2011    Ward: St Nicholas & Three Elms    Grid Ref: 350503,240048**

**Expiry Date: 29 February 2012**

Local Members: Councillors SM Michael, JD Woodward, PA Andrews, EMK Chave & C Nicholls

**1. Site Description and Proposal**

- 1.1 The application site lies to the west of Hereford's city centre on the A438 (Eign Street), and at the western edge of Hereford's Conservation Area. The area is characterised by a mix of uses including small-scale independent shops, two large food retailers (Sainsbury's and Aldi), educational (Hereford Art College and Lord Scudamore School) and residential premises (Victoria Court). The road is a busy arterial route into the city and, with residential areas further to the west, serves both local and through traffic.
- 1.2 The site is roughly rectangular in shape with an approximate area of 0.35 hectares. It is bounded to the north by Eign Street, being set back from the road behind a bus lay-by and a brick wall topped by a mature hedge. The southern boundary is shared with Lord Scudamore School and currently comprises a 3 metre high chain-link fence. The residential development of Victoria Court is to the east and the Great Western Social Club at a lower level to the west. There are a number of trees within the site, particularly along the eastern and western boundaries.

- 1.3 The site is currently occupied by Victoria House, which is centrally located with open areas surrounding it. The building was originally constructed in 1912 to provide accommodation for the resident surgeon of the Eye Hospital, and was latterly used as associated office accommodation. The Eye Hospital has since been converted to residential use and is integral to the development to the east known as Victoria Court. The office use has now ceased and Victoria House has been vacant for some time, remaining in the ownership of the Primary Care Trust. The condition of the building and its curtilage are deteriorating as a consequence of its vacancy and the surrounding grounds have become overgrown and untidy with the tarmac area immediately in front used indiscriminately by the public for parking. The building is, however, an attractive two storey structure, of brick construction with a slate hipped roof. It is well detailed, presumably to signify its importance locally, with dressed stone window surrounds and timber and render above gabled projections on the front elevation addressing Eign Street.
- 1.4 This report deals with two separate applications, both of which are intrinsically linked. The first is for the demolition of Victoria House in order to facilitate the re-development of the site. The second is a detailed planning application for its replacement with a development comprising 29 x 1 bedroom and 11 x 2 bedroom (40 in total) retirement apartments for sale to the elderly. The scheme also includes manager's accommodation and communal facilities to include a residents' lounge, laundry, over-night guest suite and a buggy store.
- 1.5 The plans show a single building occupying approximately one third of the site, with car parking for 17 vehicles in its north eastern quadrant and landscaped areas to either side, and rear of the building. It is three storeys with a maximum height of 11.1 metres to the ridge. In more detail, the accommodation is organised as a series of four brick-built elements, linked by a glazed atrium that runs through the core of the development and serves to provide residents with some of the communal facilities referred to above. Most apartments will have their own private balconies and residents will also have full access to the landscaped gardens shown on the plans to the east and west of the building.
- 1.6 The application is accompanied by a series of documents that are listed as follows:
- Design, Access and Sustainability Statement
  - Planning Statement
  - Building and PPS5 Assessment
  - Statement of Community Involvement
  - Tree Survey
  - Contaminated Land Site Investigation Report
  - Archaeological Desk Based Assessment
  - Transport Impact Report
  - Drainage Survey
  - Bat Survey and Extended Phase 1 Habitat Survey
  - Affordable Housing and Viability Statement
  - Draft Heads of Terms Agreement

## 2. Policies

### 2.1 Herefordshire Unitary Development Plan:

S1	-	Sustainable Development
S2	-	Development Requirements
S6	-	Transport
DR1	-	Design
DR2	-	Land Use and Activity

DR3	-	Movement
DR5	-	Planning Obligations
DR6	-	Water resources
H1	-	Hereford and the Market Towns: Settlement Boundaries and Established Residential Areas
H9	-	Affordable Housing
H13	-	Sustainable Residential Design
H14	-	Re-using Previously Developed Land and Buildings
H15	-	Density
H19	-	Open Space Requirements
T8	-	Road Hierarchy
T11	-	Parking Provision
LA6	-	Landscaping Schemes
NC1	-	Biodiversity and Development
HBA6	-	New Development Within Conservation Areas
HBA7	-	Demolition of Unlisted Buildings Within Conservation Areas
RST3	-	Standards for Outdoor Playing and Public Open Space

#### Supplementary Planning Documents

2.2 Planning Obligations – Adopted April 2008

2.3 National Policy Documents

PPS1	–	Delivering Sustainable Development
PPS3	–	Housing
PPS5	–	Planning for the Historic Environment
PPS9	–	Biodiversity and Geological Conservation
PPG13	–	Transport

### **3. Planning History**

3.1 There is no planning history for the site that is specifically relevant to this application. However, planning permission was granted on the adjoining site to the east under application reference DCCW2004/0108/F for the conversion of Victoria Eye Hospital to six dwellings and the erection of 18 new dwellings with associated landscaping and parking.

### **4. Consultation Summary**

#### Statutory Consultations

4.1 Welsh Water – No objections subject to the imposition of conditions relating to the separate treatment of foul and surface water

#### Internal Council Advice

4.2 Traffic Manager: Initially commented that the ratio of 0.35 spaces per apartment (17 in total) was insufficient and suggested that a ratio of 0.7 per apartment would be more appropriate, equating to 28 spaces in total. However, following an exchange of correspondence about the rationale behind the parking provision made it is recommended that, as it is argued that the average age of entry to the development is likely to be in excess of 70 years, a condition restricting availability to potential residents aged 65+ be imposed.

4.3 Conservation Manager (Historic Buildings): The heritage assessment of Victoria House by Beardmore Urban meets the requirements of PPS5 in that it 'provides a level of information that is proportionate to the significance of the asset. Its assessment of the building as a

competent but average example of an early C20th dwelling is accepted. The loss of any building must be weighed on its merits, but PPS5 accepts that some degree of change is inevitable in the built environment and that new development can make a positive contribution to the character and local distinctiveness of an area. On this basis no objection is raised to the proposal.

- 4.4 Conservation Manager (Landscape): generally content with the application, subject to conditions to deal with the detailed design of the landscaping scheme.
- 4.5 Conservation Manager (Ecology): The survey work completed is largely accepted. Additional information has been requested regarding the investigations and findings within the loft space of the building. The applicant's agent has also been advised of the Council's need as a competent authority to complete a Habitats Regulations Assessment Screening Report (an HRA). This requires the submission of further information relating to water quality issues and the potential impact of the development as it discharges to the River Wye Special Area of Conservation (SAC). This has yet to be received at the time of writing this report and is reflected in the recommendation set out below.
- 4.6 Housing Development Officer: Not supportive of the application in its current format as it does not make any on-site affordable housing provision and that the amount available for an off-site contribution does not accord with the advice given at the pre-application stage, when it was suggested that if an off-site contribution were to be accepted, it should equate to £50,000 per dwelling. Based on a 35% provision this would amount to 14 dwellings and a contribution of £700,000.
- 4.7 The suggestion made in the applicant's supporting documents that a mixed development of affordable and open market would cause friction between residents is disputed, and an example at The Rose Gardens on Ledbury Road is cited, where a mix of independent living apartments, both open market and affordable, has been very successful. This is considered to be a good and comparable example where housing management has not proved to be an issue.
- 4.8 CCTV Commissioning Officer: There are areas in close proximity to the application site where there is a high incidence of anti-social and criminal behaviour and disorder. The area of Eign Street/Whitecross Road/Great Western Way is particularly identified as a busy route in and out of the city by foot and by vehicle and a camera on the main highway over the subway under Whitecross Road would greatly enhance the current system. Accordingly a contribution of £21,865 is requested.
- 4.9 Head of Environmental Health and Trading Standards: No objection subject to the imposition of a condition relating to a remediation scheme regarding contaminated land issues.
- 4.10 Parks & Countryside: It is noted that the development includes 1,620 m<sup>2</sup> (0.162ha) of amenity green space which will include varied planting, walking routes, social seating areas, lawns and communal gardens. On this basis an off site contribution towards open space provision is not required.

## **5. Representations**

- 5.1 Hereford City Council: Object to the application and have asked that the scheme be re-designed in order that at least one parking space per flat is provided, plus some spaces for visitors and service providers.
- 5.2 Hereford Civic Society: Do not object to the application but see the lack of renewable energy as a missed opportunity.

- 5.3 Woolhope Naturalists Field Club: Object specifically to the demolition of the existing building and consider that it should be listed. They have not commented on the detailed design of the replacement building.
- 5.4 Three letters have been received in response to the period of public consultation. All of these are generally favourable towards the application highlighting the improvement of a currently derelict site and the provision of a type of accommodation that is currently lacking in Hereford as recurring themes. One resident of Victoria Court has asked for careful regard to be had to issues around residential amenity.
- 5.5 The consultation responses can be viewed on the Council's website by using the following link:-  
[www.herefordshire.gov.uk/housing/planning/58286.aspx?ID=113131](http://www.herefordshire.gov.uk/housing/planning/58286.aspx?ID=113131)

Internet access is available at the Council's Customer Service Centres:-

[www.herefordshire.gov.uk/community\\_and\\_living/consumer\\_advice/41840.asp](http://www.herefordshire.gov.uk/community_and_living/consumer_advice/41840.asp)

## **6. Officer's Appraisal**

- 6.1 Before assessing the detailed design of the replacement building, consideration must first be given to the proposed demolition of the existing building and the contribution that it makes to the character and appearance of the conservation area and the street scene.
- 6.2 Policy HBA7 of the Herefordshire Unitary Development Plan refers specifically to the demolition of unlisted buildings in conservation areas and suggests that demolition will only be permitted if:
- The proposal is accompanied by a proposal for re-development
  - The building does not make a positive contribution to the character or appearance of the conservation area, and
  - The structural condition of the building is such that the cost of repair out-weighs the importance of its retention
- 6.3 Policies HE.6 and HE.7 of PPS5 are also considered to be of relevance as they require local planning authorities to have regard to the particular nature and significance of the heritage asset (in this case the conservation area) and the impact of new development on it, taking into account the desirability for it to make a positive contribution to the character and local distinctiveness of the historic environment.
- 6.4 The proposal is the subject of two separate applications; one for demolition and the other for a replacement building. Therefore the first part of Policy HBA7 is met.
- 6.5 The second two bullet points need to be read in conjunction with one another. Their inference is that, if it is concluded that the building in question is not considered to make a positive contribution to the conservation area, its structural condition is not of significance. Elements of Policy HE.7 are also relevant here where local authorities need to assess the significance of the asset.
- 6.6 The Council's Historic Buildings Officer has considered the impact of demolishing the building and concurs with the conclusion of the applicant's assessment that it does not make such a positive contribution that it must be retained and thus compromise the re-development of the site. In coming to this conclusion, consideration has been given to the comments received from the Woolhope Naturalists Field Club who are of the view that the building is a significant piece of Arts and Crafts Architecture and is worthy of listing.

- 6.7 The Council has not received any indication from English Heritage that it is considering the building for listing and, on the basis of the comments from the Historic Buildings Officer, it is concluded that it does not make such a contribution to the conservation area to warrant its retention. Therefore, it is considered that subject to an appropriately designed replacement, the principle of demolition is accepted.
- 6.8 Turning now to the proposed redevelopment of the site, there are a number of matters to be considered with specific regard to the planning application for the new development and these can be summarised as follows:
- Affordable housing provision and viability
  - Design
  - Scale and massing
  - Impact on adjoining land uses
  - Car parking provision
  - Ecological Issues

#### Affordable housing provision and viability

- 6.9 These two issues are very closely linked and therefore it is appropriate to deal with both under the same heading.
- 6.10 It is implicit from the applicant's submission that they accept that the type of accommodation that they are providing are dwellings as defined under Class C3 of the Town and Country Planning Use Classes Order. Therefore it is appropriate to require an affordable housing provision under Policy H9 of the Herefordshire Unitary Development Plan.
- 6.11 At the pre-application stage the applicant's agent advised of their client's intention to make an off-site contribution for affordable housing. They were advised that this would need to be justified. Notwithstanding this, a figure for an off-site contribution was provided by officers to form part of a Heads of Terms Agreement. Based on an equivalent 35% provision this would amount to £700,000 – 14 dwellings at £50,000 each. It is worth noting that, at no time throughout the course of pre-application discussions or the consideration of the planning application, has the level of off-site contribution that the Council has stated been questioned but rather the implications for the viability of the scheme. This is a material consideration to which weight must be attached in the context of the overall aim of promoting sustainable development.
- 6.12 The applicant has submitted an Affordable Housing and Viability Statement as part of the application. This asserts that the provision of on-site affordable housing within developments for specialised housing for the elderly is both problematic and unviable. It concludes that in this instance, an off-site provision would be more appropriate.
- 6.13 By way of further explanation, the report advises that the type of accommodation to be provided results in the payment of a service charge by residents to cover the upkeep and maintenance of the building and grounds, and the salary of a house manager. It suggests that if low cost or subsidised housing is included within the development, an additional cost of maintenance would have to be borne by private residents, leading to potential friction or animosity. It is therefore concluded that it is more appropriate to consider an off-site contribution towards affordable housing.
- 6.14 The case for off-site provision seems to focus exclusively on incompatibility and friction between private residents and residents in low cost or subsidised properties. The statement implies that two separate blocks would be required to overcome this, adding to the cost of the development of the site and making it unviable.

- 6.15 The applicant's agent has referred to a case study in Launceston where their client did agree to a mixed development of open market and affordable units to provide evidence for these assertions. However, the Council's Housing Development Officer has highlighted a case at The Rose Gardens on Ledbury Road where a similar project has successfully incorporated a mix of affordable and open market units.
- 6.16 The report then goes on to consider the economic viability of the scheme, using the Homes and Communities Agency (HCA) Economic Appraisal Toolkit (2009) to assess development costs. It is freely available to any organisation that wishes to use it and can be used collaboratively by Local Planning Authorities and developers to help establish the viability of proposed levels of affordable housing obligations at an early stage in the planning process.
- 6.17 The financial assessment makes a number of assumptions about the eventual value of the residential units, the build cost of the development, the profit margin that should be expected by the developer and the value of the site. However, it excludes any affordable housing provision or Section 106 contributions from its development costs, and the model has been used to conclude that the excess finance, once these other factors have been considered, is the amount available for a contribution.
- 6.18 Although the viability model used is accepted nationally, its specific purpose is to assess the viability of affordable housing provision. The assessment simply presumes that it is not viable to provide affordable housing on site due to management issues and not financial pressures. The statement that it is not viable to construct two separate blocks is not supported by a financial assessment of such a provision and therefore is not substantiated. It is your officer's view that the application of the HCA's toolkit in this particular case therefore has a limited value and does not serve to test the viability of on-site affordable housing provision. In order to seek some clarity on this issue, your officer's have sought to engage the District Valuers Office (DVO). This needs to be undertaken with the agreement of the applicant, as the costs incurred are charged to them rather than the Council. The DVO offer an independent assessment of the financial viability of schemes. While your officer's have formed an opinion based on the information before them, the involvement of the DVO would bring further certainty to this issue. At the time of writing this report, agreement has yet to be reached as to whether they will be commissioned to independently assess the financial viability of the scheme, and amount of affordable housing provision available through an off-site contribution that it might make.
- 6.19 Furthermore, the Council's Housing Development Officer has also referred to a specific case in Hereford where similar accommodation has been provided without any division between open market and affordable accommodation. This serves to demonstrate that the applicant's fears about management problems can be addressed. Whilst a case study might have been provided to support an argument to the contrary, your officers have identified a comparable and successful development within the city.
- 6.20 It is concluded that the case made about the financial viability of the scheme is questionable and, in the absence of any other legitimate justification, the applicant's position regarding on-site provision is unwarranted. Accordingly it is considered that the proposal fails to make adequate provision for affordable housing and is therefore contrary to Policy H9 of the Herefordshire Unitary Development Plan.

### Design

- 6.21 As discussed in the previous paragraphs it is considered that the loss of the existing building would be justified through a replacement building that offers some benefit to the conservation area and street scene in terms of its architectural quality.
- 6.22 The plans have been amended since the original submission of the application to take account of initial concerns about the scale and massing of the building and the design of the elevation

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Further information on the subject of this report is available from Mr A Banks on 01432 383085

presenting to Eign Street. These include the introduction of a contemporary oriel window and alterations to improve the architectural rhythm of the front elevation, as well as the introduction of full height glazing mid-way along the west elevation to add a further visual break.

- 6.23 Officers are satisfied that the amendments to the detailed design of the building represent a sufficient improvement to allay the concerns raised in this respect, particularly the alterations to the front elevation. The west elevation is relieved by a combination of vegetation that will be retained within the site, and the breaks created by the different built elements. The choice of a good quality brick would also be key to the appearance of the building, but this is a matter that could be dealt with by condition.

#### Scale and Massing

- 6.24 The roof plan of the proposal shows that the building comprises four distinct elements, each with a pitched roof, connected by a glazed atrium. It has a footprint of approximately 1,150 square metres which accounts for around one third of the total site area.
- 6.25 The mass of the building is significant by comparison to the residential development of Victoria Court, which benefits greatly from the visual break provided by the shared open space at the heart of the development. However, the atrium at the core of the proposed development serves to break up the mass and the use of four separate pitched roofs also helps to minimise its overall scale. The introduction of three storeys is reflective of the development at Victoria Court which is of a similar height to this proposal, and to other buildings along Whitecross Road. The principle view will be of the north elevation from Eign Road and the scale of this is comparable to that of other building in the street scene. It is therefore concluded that the scale and mass of the proposal is acceptable.

#### Impact upon Adjoining Land Uses

- 6.26 As described earlier in this report, the area is characterised by a mix of uses. At the boundaries of the application site the two most sensitive are the residential use of Victoria Court to the east and Lord Scudamore School to the south.
- 6.27 The design of the proposal has responded to consultations undertaken with residents of Victoria Court prior to the submission of the application. The east elevation, which faces Victoria Court, is staggered and at their closest, the distance between opposing elevations is 17 metres. This relates to one modest two storey projection and more typically the distance between the two ranges between 27 and 30 metres. This relationship is considered to be entirely acceptable and will not result in any significant degree of overlooking. It is worth noting that there has been no adverse reaction to this proposal from residents in Victoria Court.
- 6.28 The proposal has been carefully assessed from the grounds of Lord Scudamore School. At its closest point in the south eastern corner, the development will be 3 metres from the shared boundary with the school, increasing to 6.6 metres at the south western corner. The proximity of the building to the school has been a point of concern throughout pre-application discussions and the consideration of this application, particularly due to mass and scale of the building at such close quarters to an area immediately adjacent within the school grounds that is used as an open air learning area. It is considered that on balance the degree of separation is acceptable. This conclusion is reached having regard to the relative orientation of the 2 sites, which would ensure that there would be no overshadowing of the outdoor teaching area, the presence of intervening trees and additional planting and the associated classroom building on the boundary. Furthermore, it is evident that the school does not object to the presence of the building and has not commented on the application.

### Car Parking Provision

- 6.29 The applicant's have submitted a Transport Impact Report with the application. This considers the likely dependency on private forms of transport by potential residents and provides an assessment based on surveys undertaken at other properties across the country owned by the applicants. In line with the definition of Category II type retirement housing, which this application seeks to provide, the age of residents will normally be restricted to 60+ except where a resident over the age of 60 has a partner of 55 years of age or over. The evidence provided by the report suggests that the average age of entry to the applicant's properties is in fact 76.
- 6.30 The report then continues to analyze car ownership levels of residents by age. Between the ages of 55-60 it shows this to be at 80%, declining steadily to 33% between the ages of 75-80. It is upon this latter level of car ownership that the applicants have based their parking provision, with 14 spaces for residents equating to a 35% overall provision, with a further three spaces for visitors.
- 6.31 In light of the assumptions made about the age of residents and their average level of car ownership, the applicant's were asked to give consideration to the imposition of a condition that would require the minimum age of the principal occupant of an apartment to be a minimum of 65. No response has been received to this request.
- 6.32 The report also states that the position regarding parking, and entitlement to a permit, would be made clear to prospective residents prior to their purchase of a property. On this basis, it is for any purchaser to decide whether or not they still want an apartment without parking in the event all of the permits had been allocated. There is an absence of on-street parking in the immediate vicinity of the application site and alternative parking is very limited, except perhaps the Horse and Groom car park opposite which charges members of the public a daily fee. It is therefore concluded that the impact of a lack of parking on site is unlikely to impact elsewhere.
- 6.33 The provision of just 17 car parking spaces in total does fall short of the normal expectations that would be placed upon a development of this nature. However, the proximity of the site to the city centre, the accessibility of local services, and the fact that a bus stop is immediately outside the site are all mitigating factors for a lower level of on-site parking and, combined with the analysis of existing sites as described above, your officers are content with the provision that has been made provided that a condition limiting the minimum age of the principal occupant of each apartment is imposed. On this basis the car parking provision is considered to be acceptable.

### Ecological Issues

- 6.34 At the time of writing this report, the further information requested by the Council's Ecologist regarding the method and extent of internal inspection of the building for the presence of bats and information regarding water quality and HRA has yet to be received.
- 6.35 The latter of these two issues is one that demands further explanation as it is likely to become a matter that affects an increasing number of planning applications across certain parts of the county in the future. Phosphate levels in the Rivers Wye and Lugg have been identified as being at a critical level, to an extent that it potentially compromises their designations as SACs. As a competent authority, the council has an obligation to complete a screening opinion to determine whether or not developments within their catchment areas are likely to have significant effects on them. This is not a matter to be considered in isolation, but also in respect of the in combination effects of other developments within the catchment area. In order to do this, the Council requires the applicant to provide them with additional information about water quality issues.

6.36 If committee were minded to approve the application for planning permission, then delegated authority could be given to named officers to approve the application subject to the resolution of these matters. Without such a resolution, and in the absence of the information required, this would be a reason to refuse the application.

Conclusion

6.37 The lack of appropriate affordable housing provision, either through an on-site provision or an acceptable off-site contribution means that this proposal is contrary to Policy H9 of the Herefordshire Unitary Development Plan. The subsequent lack of an acceptable Heads of Terms Agreement means that the proposal also fails against the requirements of Policy DR5 and the Council's adopted Planning Obligations SPD. In this case these concerns are outweighed by any overriding material considerations and the redevelopment proposal is therefore recommended for refusal.

6.38 In the absence of an approved scheme for the redevelopment of the site the first requirement of Policy HBA7 is not met and consequently the application for Conservation Area Consent is also recommended for refusal.

**RECOMMENDATION**

**In respect of DMS/113131/F that planning permission be refused for the following reasons:**

- 1. The proposal fails to make adequate provision for affordable housing. The local planning authority is not satisfied that the Affordable Housing and Viability Statement submitted in support of the application is sufficiently detailed and does not demonstrate that a provision of on-site affordable housing would be economically unviable, or that the low level of contribution proposed for an alternative off-site provision is warranted. In the absence of an on-site affordable housing provision or sufficient justification for non provision, or an equivalent off-site contribution, the proposal is contrary to Policy H9 of the Herefordshire Unitary Development Plan.**
- 2. In the absence of an agreed Draft Heads of Terms Agreement the proposal is contrary to Policy DR5 of the Herefordshire Unitary Development Plan and the Council's adopted Supplementary Planning Document - Planning Obligations.**

**In respect of DMS/113132/C that planning permission be refused for the following reason:**

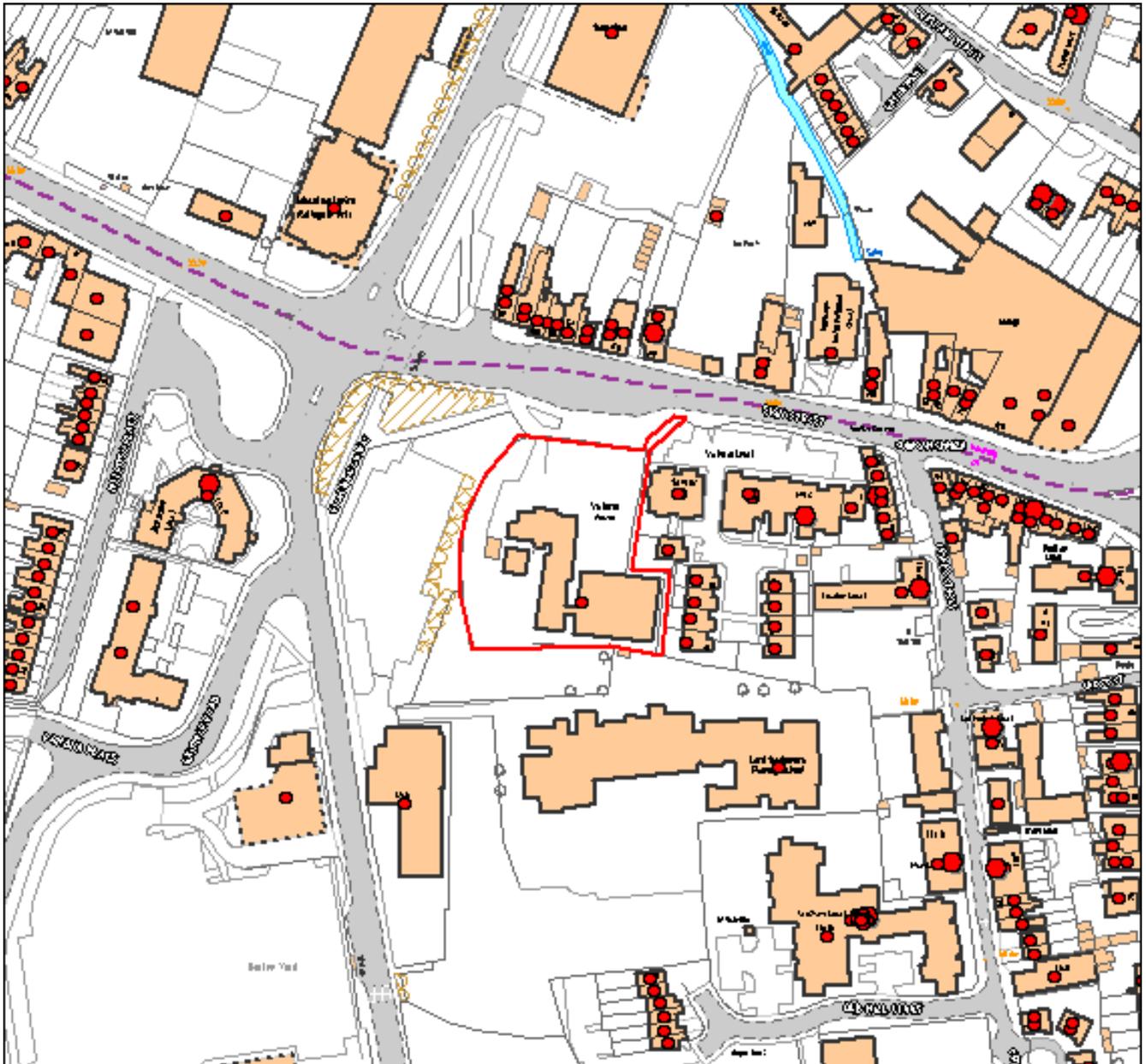
- 1. In the absence of an approved scheme for the redevelopment of the site the demolition of the existing building is unwarranted and the clearance of the site would be detrimental to the character and local distinctiveness of the Conservation Area contrary to Policy HBA7 of the Herefordshire Unitary Development Plan.**

Decision: .....

Notes: .....

**Background Papers**

Internal departmental consultation replies.



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**APPLICATION NOS:** DMS/113131/F & DMS/113132/C

**SITE ADDRESS :** VICTORIA HOUSE, 149-153 EIGN STREET, HEREFORD, HR4 0AN

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