



## Appendix 1

### Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Ledbury NDP (Submission Draft Plan – July 2022)

[Ledbury review Regulation 16 Neighbourhood Development Plan \(herefordshire.gov.uk\)](https://herefordshire.gov.uk)

Date: 11/11/2022

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
<b>Policy SD1.1</b>  Ledbury as a Self-Sustaining Community	<b>Policy SD1</b>  Sustainable design and energy efficiency  <b>Policy SD2</b>  Renewable and low carbon generation  <b>Policy SD3</b>  Sustainable water management and water resources  <b>Policy SS4</b>  Movement and transportation  <b>Policy MT1</b>  Traffic management, highway safety and promoting active travel	Y	
<b>Policy SD1.2</b>  Settlement Boundary	<b>Policy LD3</b>  Green infrastructure	Y	
<b>Policy SD1.3</b>  Sustainable Design	<b>Policy SD1</b>  Sustainable Design and energy efficiency  <b>Policy SS7</b>	Y	

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<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
	Addressing climate change <b>Policy LD3</b> Green infrastructure <b>Policy SD3</b> Sustainable water management and water resources		
<b>Policy HO2.1</b>  Reinforcing Balanced Housing Communities	<b>Policy H3</b>  Ensuring an appropriate range and mix of housing	Y	
<b>Policy HO2.2</b>  Housing Density	<b>Policy SS2</b>  Delivering new homes	Y	
<b>Policy HO2.3</b>  Design Criteria for Residential Development	<b>Policy SS6</b>  <b>Policy LD1</b>  <b>Policy SD1</b>  <b>Policy LD3</b>	Y	
<b>Policy HO3.1</b>  Housing for the Elderly	<b>Policy H3</b>  Ensuring an appropriate range and mix of housing	Y	
<b>Policy HO4.1</b>  Housing for Young People	<b>Policy H3</b>	Y	
<b>Policy HO5.1</b>  Self-build	<b>Policy H1</b>  Affordable housing  <b>Policy RA3</b>  Herefordshire's countryside	Y	
<b>Policy EE1.1</b>  New Employment Sites – Land South of Little Marcle Road	<b>Policy LB1</b>  Development in Ledbury  <b>Policy SD3</b>	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
	Sustainable water management and water resources		
<b>Policy EE1.2</b>  Small Employment Sites Within and Adjoining the Town	<b>Policy LB1</b>	Y	
<b>Policy EE1.3</b>  Protecting Existing Employment Land	<b>Policy E2</b>  Redevelopment of existing employment land and buildings	N (?)	Policy EE1.3 restricts all changes of use of employment land to non-employment uses whereas Policy E2 in the Core Strategy states that loss of employment land rated as 'moderate' will be permitted in certain circumstances.
<b>Policy EE2.1</b>  Promoting Visitor Accommodation	<b>Policy E4</b>  Tourism	Y	
<b>Policy EE3.1</b>  Protection of Shopping Frontages and Primary Shopping Area	<b>Policy E6</b>  Primary shopping areas and primary and secondary shopping frontages	Y	
<b>Policy EE3.2</b>  Defined Town Centre	<b>Policy E5</b>  Town centres  <b>Policy LB1</b>	Y	
<b>Policy EE3.3</b>  Lawnside and Market Street Regeneration and Opportunities Area	<b>Policies:</b>  <b>SS6, SS4, LB1, E2, CS1, LD3, LD4, SD1, MT1</b>	Y	
<b>Policy BE1.1</b>  Design	<b>Policy SS6</b>  Environmental quality and local distinctiveness  <b>Policy SD1</b>  Sustainable design and energy efficiency	Y	

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<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
<b>Policy BE2.1</b>  Protecting and Enhancing Heritage Assets	<b>Policy LD4</b>  Historic environment and heritage assets	Y	
<b>Policy NE1.1</b>  Protecting and Enhancing Biodiversity, Geodiversity and Green Infrastructure	<b>Policy LD2</b>  Biodiversity and geodiversity  <b>Policy LD3</b>  Green infrastructure	Y	
<b>Policy NE2.1</b>  Conserving the Landscape and Scenic Beauty of the Parish	<b>Policy LD1</b>	Y	
<b>Policy NE2.2</b>  Protecting Important Views and the setting of the Town	<b>Policy LD1</b>	Y	
<b>Policy NE3.1</b>  Allotments and Community Gardens in and around Ledbury	<b>Policy OS1</b>  Requirement for open space, sports and recreation facilities  <b>Policy OS2</b>  Meeting open space, sports and recreation needs  <b>Policy SS6</b>  <b>Policy LB2</b>	Y	
<b>Policy NE4.1</b>  Farming Landscape around Ledbury	<b>Policy RA4</b>  Agricultural, forestry and rural enterprise dwellings  <b>Policy RA5</b>  Re-use of rural buildings	Y	
<b>Policy NE5.1</b>	<b>Policy LD2</b>	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
Protecting Ledbury's Woods			
<b>Policy CL1.1</b>  Community Services and Facilities	<b>Policy SC1</b>  Social and community facilities	Y	
<b>Policy CL2.1</b>  Protection of Open and Green Spaces and Playing Fields	<b>Policy OS3</b>  Loss of open space, sport and recreation needs  <b>Policy LD3</b>  Green infrastructure	Y	
<b>Policy CL2.2</b>  Alternative Use of Land South of Little Marcle Road as Playing Fields	<b>Policy OS2</b>  <b>Policy OS3</b>	Y	
<b>Policy TR1.1</b>  Footpaths and Cycleways	<b>Policy SS4</b>  <b>Policy MT1</b>	Y	
<b>Policy TR1.2</b>  Highway Design Requirements	<b>Policy SS4</b>  <b>Policy MT1</b>	Y	The heading 'Active Travel Measures' should instead be 'Active Travel and Public Transport Measures' as this section also includes reference to the latter.
<b>Policy TR2.1</b>  Ledbury Railway Station	<b>Policy SS4</b>  <b>Policy MT1</b>  <b>Policy LB2</b>	Y	

#### Other comments/conformity issues:

This NDP is in general conformity with the policies of the Core Strategy and the strategic planning team therefore raise no objections.

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## Appendix 2

### Herefordshire Council - Development Management Comments

Policy	Comment
General Comments/Introduction	<p>The settlement boundary inclusion is positive. This does not need to be expanded or tightened up.</p> <p>The list of policies within the contents page is welcome</p> <p>Add the policies in full at the end of the document for ease of reference.</p>
SD1.1	No comments to add, noting this appears to carry over from the adopted NDP.
SD1.2	<p>It is suggested the policy be amended by adding the word 'open',</p> <p>"Outside of this boundary, land will be considered open countryside and development complying with relevant rural area planning policies should recognise its intrinsic character and beauty".</p> <p>This is to bring the wording in line with Policy RA3 of the CS. It may also be beneficial to make reference to Policy RA3 of the CS, or as superseded by the Local Plan in review.</p>
SD1.3	Unclear as to proposals this policy is applicable to. Should this Policy be defined solely for major development? It appears excessive for full householder applications e.g. extensions to dwellings to incorporate these measures when it may be possible to achieve under permitted development i.e. not actually require the benefit of planning permission to be applied for. As a further point, the last sentence within paragraph 5.9, in terms of context, could be brought into the policy itself, helping make the policy a bit more explicit.
HO2.3	<p>This policy would be more effective if it is broken down into several policies and relate to either 'new residential development' and then consider a separate policy being introduced solely for 'householder' applications.</p> <p>Many NDPs often focus on the larger major developments, although many of the applications in the neighbourhood area are actually 'full householder' application. In our opinion, the policy is convoluted, trying to encompass multiple spatial planning matters e.g. design, townscape, landscape, residential amenity, historic environment, sustainability. Whilst supportive of what the policy is trying to achieve, it would be beneficial if the policies can be broken into themes, helping a) interpretation by officers but moreover b) achieving realistic aspirations. 'Where appropriate' could lead to confusion and differing interpretation. It would be beneficial to re-draft this policy and logical to break down into creating several additional policies.</p>

Policy	Comment
HO2.1	<p>The policy, which does carry over from the adopted NDP, should perhaps make a distinction between 'windfall' and more all major development. Self-build is not just applicable to major development. Make it a more generalised policy or define 'windfall' which makes it appear that only windfall development must adhere to this policy of housing mix.</p>
HO2.2	<p>No comments to offer principally noting that this does appear to carry over from the adopted NDP however sentence one and two appears to duplicate.</p> <p>"The housing density of new development should respect its surroundings through good design which responds positively to local character, including the location, type of housing required and the local environment, and within the range of 30 to 50 dwellings per hectare especially for larger sites".</p> <p>This would enable officers to make a clear and informed assessment on local character which will vary depending on context, otherwise the policy undermines itself and may be exploited, particularly for 'major' development</p>
HO5.1	<p>Whilst self-build is a material consideration, it is not an exception under Policy RA3 of the Core Strategy and appeal decisions have confirmed that self-build can only be afforded at most, modest weighting in favour of a scheme.</p> <p>A question should be asked as to how much emphasis is being placed self-build. It may be of suggestion to delete the policy because it will be picked up, more than likely in the Local Plan review and may lead to conflict between the NDP and Core Strategy in the short/medium term until the Local Plan is adopted.</p>
EE1.2	<p>As specific reference is made to effectively allocating the east of Dymock Road site, it would be beneficial to create a separate policy rather than it forming 'small employment sites within and adjoining the town' For example make paragraph 1 a separate policy and paragraphs 2 and 3 another policy.</p>
EE1.3	<p>This is well worded policy. Officers welcome reference to market value.</p>
EE2.1	<p>Officers consider this policy places significant benefits on the provision of a budget hotel and potentially undermines the LPA's position in terms of assessing a broader scheme which includes other land uses which could potentially cause conflict with the development plan.</p> <p>It would also be advantageous to define 'adjacent' particularly as a lot of sites on the edge of town have considerable holiday accommodation already</p>
EE3.1	<p>Officers welcome clarification as to what are 'exceptional circumstances'? Prior approval could be utilised to facilitate change of use partly making the policy redundant in some instances e.g. Prior Approval under Class MA. Officers would encourage the steering group to check the extent of</p>

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Policy	Comment
	the blue line of the 'primary shopping frontage' which appears to incorporate residential uses already and appears to be obsolete in some instances.
EE3.2	This is another good policy with locally set threshold. A query is raised in respect of parking spaces which may not be achievable if trying to promote active travel as part of Policy SD1.1.
BE1.1	Suggest the last sentence be omitted which is currently onerous for full householders applications. If Policy HO2.3 is also re-drafted, does BE1.1 now become obsolete?
BE2.1	<p>A much needed policy given the importance of heritage to the town but with some amendments suggested. Under sub-paragraph a), replace 'resisting' with a more appropriate word in line with the Scheduled Ancient Monument Act. With regards to c), again replace 'resisting' with where it does not conserve or enhance heritage assets.</p> <p>The wording needs to be in line with terminology with the NPPF and relevant acts.</p> <p>With regards to d), replace preserve with conserve. The latter half of the policy appears overly specific. Re-writing sub paragraph c) to effectively say that development proposals should be conserving or enhancing designated and non-designated heritage assets would remove the need for such specific references.</p>
NE2.1	The policy should be re-worded to make it "conserve and or enhance the area's landscape character" You may wish to break down into a landscape policy and a separate tree policy
TR1.1	Integrated links and highways measures should be more at the forefront.
TR1.2	This is a very extensive policy and a query is raised as to the extent of its application e.g. all development or (non-)major development only excluding full householder applications?
Other points to raise	<p>A policy in respect of Barn Conversions or a mention of this in design policy would be welcomed</p> <p>NDP is very prescriptive in parts and would benefit from refinement. Whilst we appreciate that this needs to strike a fine balance, one cannot stifle innovation and development altogether.</p> <p>Officers highlight paragraph 14 of the NPPF and would encourage that 'allocations' be shown on the Map to avoid scrutiny potentially if a major development on the edge of town comes forward again</p>

## **Ledbury Reviewed Neighbourhood Development Plan**

### **Ledbury Town Council response to representations made at the Regulation 16 Stage, November 2022**

(NB Representations listed in this Schedule are only those to which a response is considered necessary)

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## **Ledbury Reviewed NPD.**

The Schedule below provide responses to representations received upon the Submission Draft Reviewed Ledbury NDP at the Regulation 16 stage where it is felt this is required. When reviewing the detailed Regulation 16 responses to the NDP, there is a need also to read these in the context of what the Town Council, through considering the strategic planning requirements, its further investigations and consultations with its community, has identified as the main concerns about the future of the Town and its surrounding rural parts. The need to contribute positively to outstanding elements of sustainable development and to define a settlement boundary were key outputs aimed at addressing the strategic objectives set by Herefordshire Local Plan Core Strategy, in particular policy LB1. In addition, the Examiner might also consider responses given previously to representations and other comments at the Regulation 14 stage which are set out in Section 3 of the Consultation Statement. The Examination Report upon the current NDP together with its associated Consultation Statement may also be useful in relation to policies that were not modified to any significant extent in the reviewed draft plan.

### **Contributing to Sustainable Development**

NDPs are required to contribute towards 'sustainable development' (basic condition 'd') having regard to national policies and advice (basic condition 'a') and to be in general conformity with the development plan (basic condition 'e'). Other requirements relate to Listed Buildings, conservation areas and European obligations. The current NDP addresses a number of the elements of sustainable development and this review seeks to build upon this so that the full range of economic, social and environmental objectives are covered in a mutually supportive way.

Ledbury Review NDP sets a sustainable development policy (policy SD1.1) covering key environmental provisions to address the climate emergency, supplementing Herefordshire Local Plan Core Strategy policy SS1 and consistent with the National Planning Policy Framework. The Basic Condition Statement sets out how it is proposed the NDP's policies will contribute towards the latter, particularly in its Section 2. Since Herefordshire Council's vision of a self-reliant and resilient County informed the Core Strategy's approach to sustainable development, there has been recognition that plans must be able to respond rapidly to the climate and ecological emergencies. In this regard the Town is aware that it should contribute positively to a number of Government's 17 sustainable development goals<sup>1</sup>, located as it is within a rural County. The Town has a major part to play in contributing to food production and security (including retaining high quality agricultural land), reversing biodiversity loss (through supporting and adding to the County's ecological network), and combating climate change and its impacts (including by maintaining soils that act as carbon sinks, especially grasslands and woodlands).

Strategic policies for the town in the Local plan Core Strategy are acknowledged with the review seeking to address those that were not fully addressed in the current plan as well as a number of matters that were left unresolved. It does not seek to second guess the direction of growth that might result for the

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<sup>1</sup> <https://www.gov.uk/government/publications/implementing-the-sustainable-development-goals-2>

review of the Local Plan Core Strategy that is underway but yet to reach a stage where an option for the form of future growth has been agreed. Hence it is considered that the current Local Plan Core Strategy is that which must be conformed with to meet the provisions of basic condition 'e'. It is accepted that a further review will be required when the Core strategy review has reached an appropriate point. The following describes how the strategic land-use requirements to achieve sustainable development have or will be met.

#### **Social requirements:**

- The strategic housing requirements have been more than met, with the required housing growth for the plan period already being exceeded by some 50% and with the strategic housing location included within the settlement boundary and having received planning permission.
- Current and potential future needs for community facilities and infrastructure have been identified and where possible proposals made to meet these, either by site specific provisions or encouragement through defining locational criteria.
- Accessibility through various forms of movement is promoted in connection with development proposals.

#### **Economic requirements:**

- The absence of a specific land use proposal land for employment to the south of Little Marcle Road in the current NDP has been addressed, including provision beyond the minimum requirement to take into account the additional housing growth in order to meet the self-reliant and environmentally sustainable policy provision.
- Policy provision with appropriate locational requirements is made to promote small employment sites elsewhere around the town, including that within the strategic housing and employment location (policy LB2).
- A town centre is defined in order to add precision to the strategic provisions that aim to maintain and enhance its vitality and viability.

#### **Environmental requirements:**

- Planning policy elements of Ledbury Town Design Guide that are relevant to the historic and built environment have been included within and expanded upon within the NDP to ensure the character of the town is maintained and enhanced, including a provision to protect the town's setting overlooking the Leadon valley to the west.
- Again, elements of Ledbury Town Design Guide relevant to landscape character are included and expanded upon, including provisions that would protect Malvern Hills AONB and its setting, and also to protect and enhance the setting of the town from eastern and western viewpoints.
- The previous omission of protection and enhancement of green infrastructure, including biodiversity and connections to the public rights of way network has been rectified, with additional provisions to incorporate areas to the south of the town where new unexpected development has taken place.

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## Representations

Representations from the following provide support or neutral comment in response to consultation. The Town Council is, however, grateful for the organisations concerned in providing a response. They include:

- Dwr Cymru Welsh Water
- Colwall Parish Council
- Herefordshire Council's Economic Development Team
- The Coal Authority
- Forest of Dean District Council
- Historic England
- Environment Agency
- Natural Resources Wales (In relation to this, it is noted that Natural England has not submitted any comments on the Review NDP.)
- Wellington Heath Parish Council

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Only 9 representations at the Regulation 16 consultation stage appear to require responses. Some of these also contain support for the approach and/or policies. Again, the Town Council is grateful to those concerned. Only one representation is from a member of the local community. There were many other comments from residents at the Regulation 14 stage, and the Examiner will no doubt consider these. They are provided in an appendix to the Consultation Statement. Some of the representations received at Regulation 14 are the same as or similar to those received at Regulation 14. This schedule of responses to representations may usefully be read with those to comments previously received.

**Schedule 1: Representations received at the Regulation 16 stage requiring a response**

Ref	Representation By	Summary of Representation	Comments made by Statutory Consultees	Parish Council Response
1	Herefordshire Council Transportation Department	<p>1. Cycle storage should be secure, covered and individual to the dwelling/work place.</p> <p>2. Provide achievable and logical connections to community facilities and sites. Links should look to be made through car free routes which put the pedestrians and cyclist priority.</p> <p>3. When submitting development plans, developers need to assess the impact the proposals will have on the existing highway. This should include active modes of transport with walking and cycling the highest priority.</p> <p>4. The site assessment should be related to size of the development. Large developments and/or developments which may have a severe impact on the highway should submit a Transport Assessment/Statement to meet the following criteria, Department for Transport guidance, Manual for Streets 1/2, and Herefordshire Council Highways design guidance. Early engagement on larger development through the Herefordshire Council's Pre application planning</p>	<p>1. Policies HO2.3 and TR1.2 cover the issue of cycle parking at the level considered appropriate for a planning policy. The latter also refers to new development being designed in accordance with Herefordshire Council's Highway Design Guide for New Development which is where such detailed design guidance is or should be located.</p> <p>2. This is covered by Policies TR1.1 and TR1.2 in so far as is considered appropriate for planning policies.</p> <p>3. Policy TR1.2 covers these matters including the need for developers to show how such provisions have been met where this is appropriate.</p> <p>4. Policy TR1.2 covers this, including the need for developers to show how such provisions have been met where this is appropriate.</p>	

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	<p>service is strongly advised. Any site which it is assessed to have its impact on the highway classed a severe should look at mitigating the impact.</p> <p>5. Every site should look to promote walking and cycling, this could include but it's not limited to the following, connections to existing footway/cycleways, provision of new footways/cycleways, connections to bus stops. Cycle storage should meet HC guidance and should be provided to be secure, covered and individual. Businesses can also promote cycling by the provision of showers, changing facilities and lockers as well cycle storage. Connections and improvements to the National cycle route network where possible.</p> <p>6. A site of any size should be able to accommodate parking and turning within the designated site area. Parking and turning should meet Herefordshire Council design guide specifications.</p> <p>7. Tourism impacts on the highway should be mitigated against.</p> <p>8. Is it would be worth the document making reference that CIL will apply in the future instead of s.106.</p>	<p>5. This is covered by policies HO2.3, TR1.1 and TR1.2, including reference to developments being designed in accordance with Herefordshire Council's Highway Design Guide for New Development.</p> <p>6. The requirement for developments to be designed in accordance with Herefordshire Council's Highway Design Guide for New Development is included in policy TR1.2.</p> <p>7. As with all developments, that involving tourism is covered by policies TR1.1 and TR1.2. The NDP should be read as a whole and there is no need to duplicate requirements for all forms of development covered.</p> <p>8. See NDP paragraph 2.16 and policy CL1.1.</p>
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	<p>9. It is noted that The Ledbury Public Realm and Transportation Appraisal has been included in the NDP to highlights the highways issues around Ledbury as well as including potential improvements, however this list was drawn up a while ago and should be looked to be updated especially for provision along the south area of Leadon Way.</p> <p>10. EE1.1 – This should be included in the wording - Appropriate access, which has been assessed on both vehicle impacts and providing sustainable routes. This should also include a Travel Plan.</p>	<p>9. It is encouraging to hear support for the Public Realm and Transportation Appraisal is to be updated and the Town Council looks forward to contributing towards this when it is commissioned by Herefordshire Council. This would assist that Council in meeting its obligations under Core Strategy policy SS4. NDP paragraph 11.5 refers to the possible identification of further measures.</p> <p>10. It is felt that criterion c) covers the matter of sustainable routes in a more understandable form. However, should the examiner feel this change, including reference to the need for a Travel Plan, needs to be emphasised other than rely upon policy TR1.2, then there would be no objection.</p>	<p>11. There is very little on buses in the whole document. Look to include "Bus back Better" More reference to buses to support development should be included in the NDP policies. Transport for visitors and employment should also be included.</p> <p>12. Protecting the town centre has an over dependence on car trips – Cycle parking should be included. The hierarchy of travel modes should be referenced, with pedestrians given the highest priority.</p>	<p>11. It is understood that Bus Back Better is Government's Strategy for buses. Having looked at this, it is difficult to discern what development planning related matters can be advanced through a NDP. There is reference to traffic management and investment to prioritise buses including prioritising buses on the highway and providing improved roadside infrastructure (e.g., bus stops and shelters). However, these are unlikely to be the subject of planning applications. Nevertheless, they may be matters where provisions should be negotiated as part of an travel plan (covered by policy TR1.2 [g]). Measures elsewhere might more appropriately be a matter for the review of the Public Realm and Transportation Appraisal which it is understood is being encouraged.</p> <p>12. Policy EE3.2 indicates new town centre development will be expected to provide cycle parking. It also indicates that pedestrian access should be retained or enhanced through such developments. Policy TR1.1, which is substantially a saved policy from the current NDP, identifies a number of routes that that should be improved to provide for pedestrians and cyclists.</p>
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	<p>13. Leadon Way – a. The cycle way to connect the Town Trail to Leadon way whilst it is a good idea to provide the connection the practically/buildability of it may not result in the required connection as the land is not in the ownership of the highway authority and is private. b. Potential connections via Sheppard's Close/Jubilee Close should be mentioned.</p> <p>14. Policy EE3.3 – It should be noted that any provision should take into account sustainable modes of travel, however the area highlighted includes the swimming pool car park. Any changes to this provision may result in parking being dispersed around residential streets.</p> <p>15. Policy SD1 – further details should be included on development being accessible by sustainable modes - a sustainable hierarchy of travel mode. It should also include bus infrastructure.</p> <p>16. Policy HO2.3 – should include ensure permeable by all modes. There could also be specific references to buses in this context.</p> <p>17. EE1.1 - Would benefit from NMU access points -possibly to Ross Road or the canal trail and or cycle connections to tie in with those at the Ross Road / Leadon way roundabout</p>	<p>13. The routes identified are generally associated with areas where development is proposed or to be encouraged, and improvements would generally be achieved as part of negotiations with developers through about site layouts or off-site works as part of Travel Plans (among other methods). Leadon Way is one area where development is underway with further expected and although the potential to use the connection suggested is useful, other possibilities should not be ruled out by specifically referring this one.</p> <p>14. Developments will need to take into account other policies in the NDP, including those for car parking, active travel and sustainable transport infrastructure. The policy highlights measures that, in particular, need to be addressed and this includes increasing connectivity to the town centre through increased pedestrian access.</p> <p>15. These are covered by policies HO2.3, TR1.1 and TR1.2 to the extent that it can be through a NDP and need not be duplicated.</p> <p>16. This is a housing policy. Policies TR1.1 and TR1.2 relate specifically to transportation matters. The issue of buses is referred to above (11).</p> <p>17. Unsure what NMU refers to. Criterion c) refers to connections to foot and cycle routes in the vicinity.</p>
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